

Windsor 2040 General Plan

Final Environmental Impact Report
SCH #2016112065

prepared by

Town of Windsor
P.O. Box 100
Windsor, California 95492

prepared with the assistance of

Rincon Consultants, Inc.
449 15th Street, Suite 303
Oakland, California 94612

and

W-Trans
490 Mendocino Avenue, Suite 201
Santa Rosa, California 95401

February 2018

Rincon Consultants, Inc.
Environmental Scientists Planners Engineers
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Table of Contents

Acronyms and Abbreviations v

Executive Summary 1
Project Synopsis 1

1 Introduction 21
1.1 Overview of the 2040 General Plan 21
1.2 Purpose and Legal Authority 22
1.3 Scope and Content 24
1.4 Lead, Responsible, and Trustee Agencies 25
1.5 Intended Uses of the EIR 26
1.6 Environmental Review Process 27

2 Project Description 29
2.1 2040 General Plan 29
2.2 Project Proponent 29
2.3 Project Location 29
2.4 Project Objectives 33
2.5 Characteristics of the Proposed 2040 General Plan 36
2.6 General Plan Buildout 41
2.7 Required Discretionary Approvals 42

3 Environmental Setting 43
3.1 Regional Setting 43
3.2 Physical Setting 43
3.3 Demographics 44
3.4 Cumulative Development 45

4 Environmental Impact Analysis 47
4.1 Aesthetics 49
4.2 Agricultural Resources 65
4.3 Air Quality 79
4.4 Biological Resources 101
4.5 Cultural Resources 119
4.6 Geology and Soils 141
4.7 Greenhouse Gas Emissions 157
4.8 Hazards and Hazardous Materials 173
4.9 Hydrology and Water Quality 195
4.10 Land Use and Planning 221
4.11 Noise 243
4.12 Population and Housing 263
4.13 Public Services 273
4.14 Transportation/Traffic 285
4.15 Utilities and Service Systems 323

4.16 Tribal Cultural Resources 339
4.17 Effects Found Not to be Significant 345

5 Other CEQA Required Sections 347
5.1 Growth Inducing Effects 347
5.2 Irreversible Environmental Effects 348
5.3 Energy Effects 349

6 Project Alternatives 355
6.1 Alternative 1: No Project 356
6.2 Alternative 2: Proposed 2040 General Plan without UGB Renewal and Expansion 361
6.3 Alternative 3: New Agriculture Designation, No Mixed-Use Outside of Downtown, Less Overall Growth in Town 366
6.4 Environmentally Superior Alternative 371

7 References and Report Preparers 373
7.1 Bibliography 373
7.2 List of Preparers 383

8 Responses to Comments on the Draft EIR 385

9 Addenda/Errata 481

Tables

Table 1 Summary of Environmental Impacts and Mitigation Measures 3
Table 2 Description of Land Use Designations 36
Table 3 Projected Dwelling Units 41
Table 4 Projected Population 41
Table 5 Town-Designated Scenic Corridors 50
Table 6 Sonoma County Annual Agricultural Crop Report 66
Table 7 Important Farmlands in the General Plan Area 67
Table 8 Sonoma County Land Conversion 70
Table 9 Federal and State Ambient Air Quality Standards 81
Table 10 Ambient Air Quality Data 83
Table 11 Operational Emissions 89
Table 12 2017 Clean Air Plan Control Measures 95
Table 13 Town of Windsor Historical Register Listings 128
Table 14 Geologic Units within the Plan Area 129
Table 15 Estimated Greenhouse Gas Construction Emissions 167
Table 16 Estimated 2040 General Plan Emissions 168
Table 17 Hazardous Materials Sites in the General Plan Area 175
Table 18 Basin Plan Beneficial Uses 198

Table 19 Existing Land Use Summary 222
Table 20 2040 General Plan Consistency with Plan Bay Area 2040 Goals 236
Table 21 Town of Windsor Noise and Land Use Compatibility Guidelines 249
Table 22 Maximum Noise Levels by Receiving Land Use 250
Table 23 Vibration-Related Building Damage Thresholds 251
Table 24 Typical Noise Levels for Construction Equipment 253
Table 25 Vibration Levels for Typical Construction Equipment 255
Table 26 Acceptable Exposure Levels for Community Noise Environments 260
Table 27 Population in the Town of Windsor (2000 – 2017) 263
Table 28 Households in Windsor and Sonoma County 264
Table 29 Housing Units in Windsor Defined by Units Per Structure 265
Table 30 Windsor Population, Housing, and Employment 265
Table 31 Town of Windsor Regional Housing Needs Assessment 2014-2022 266
Table 32 Projected Population Growth Through 2040 269
Table 33 Plan Area School Enrollment and Capacity 277
Table 34 Current General Plan Development and Applied Trip Generation Rates 298
Table 35 Intersection Level of Service Descriptions 300
Table 36 Existing Peak Hour Intersection Levels of Service 301
Table 37 Comparison of Traffic Scenarios - Peak Hour Intersection Levels of Service 305
Table 38 Future Peak Hour Intersection Levels of Service – Year 2040 Cumulative Conditions with 2040 General Plan 311
Table 39 Future Mitigated Peak Hour Intersection Levels of Service – Year 2040 Cumulative Conditions with 2040 General Plan 313
Table 40 Locations Where Queuing Exceeds Storage Capacity 316
Table 41 Town of Windsor Projected Future Water Use (Acre Feet per Year) 323
Table 42 Native American Tribes Requesting Consultation 340
Table 43 Project Energy Use Relative to Statewide Energy Use 350
Table 44 Project Operational Vehicle Fuel Consumption 351
Table 45 Alternative Comparison 372
Table 46 2015 General Plan Farmland Acreage 398
Table 47 2040 General Plan Farmland Acreage 399
Table 48 2040 General Plan Policy Changes 487
Table 49 2040 General Plan Land Use Designation Changes 491

Figures

Figure 1 Regional Location 30
Figure 2 General Plan Area 32
Figure 3 1996 General Plan Land Use Map 34
Figure 4 Project Site and General Plan Proposed Land Use Map 35
Figure 5 Farmland in the Town of Windsor 68
Figure 6 Williamson Act Contract Lands 69
Figure 7 Vegetation Communities 102
Figure 8 Special-status Species and Natural Communities Reported by the California Natural Diversity Database 103
Figure 9 Geologic Map of the General Plan Area 123
Figure 10 Paleontological Sensitivity of Geologic Units within the General Plan Area 133
Figure 11 Alquist-Priolo Earthquake Fault Zones 143
Figure 12 Existing Town of Windsor Schools with 1/4-Mile Buffer 174
Figure 13 Fire Hazards 193
Figure 14 Major Drainages 197
Figure 15 Flood Hazard Areas 200
Figure 16 Existing Noise Contours 246
Figure 17 2040 Noise Contours 257
Figure 18 Project Study Intersections 289
Figure 19 Existing and Planned Bicycle Facilities 290
Figure 20 Bus Routes in and Surrounding the Town 292
Figure 21 Windsor 2040 Circulation System 314

Appendices

Appendix A Notice of Preparation (NOP) and NOP Responses
Appendix B California Emissions Estimator Modeling Results
Appendix C Sensitive Species Inventory Tables
Appendix D Traffic Analysis
Appendix E Native American Consultation Letters
Appendix F Mitigation Monitoring and Reporting Program

Acronyms and Abbreviations

ABAG	Association of Bay Area Governments
AFY	Acre-feet per year
ALUC	Airport Land Use Commission
APN	Assessor Parcel Number
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CalRecycle	California Department of Resources Recycling and Recovery
CGS	California Geological Survey
CRHP	California Register of Historical Resources
CALUP	Comprehensive Airport Land Use Plan
CARB	California Air Resources Board
CDF	California Department of Forestry and Fire Protection
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CESA	California Endangered Species Act
CNPS	California Native Plant Society
CNDDB	CDFW Natural Diversity Data Base
CUPA	Certified Unified Program Agency
CRF	Code of Federal Regulations
CSC	Species of Special Concern
DOC	(California) Department of Conservation
DOF	(California) Department of Finance
DPR	(California) Department of Pesticide Regulation
DTSC	(California) Department of Toxic Substances Control
DWR	(California) Department of Water Resources

FESA	Federal Endangered Species Act
FESD	(Sonoma County) Fire and Emergency Services Department
EIR	Environmental Impact Report
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FMMP	Farmland Mapping and Monitoring Program
LAFCO	Local Agency Formation Commission
GHG	Greenhouse Gases
HSA	Hydrologic Subarea
HUD	U.S. Housing and Urban Development
HSWA	Hazardous and Solid Waste Act
HWCL	California Hazardous Waste Control Law
ICS	Incident Command System
IPaC	Information for Planning and Conservation
LBP	Lead-based paint
LHMP	Local Hazard Mitigation Plan
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MG	Million gallons
MGD	Million gallons per day
MJ-LHMP	Multi-Jurisdictional-Local Hazard Mitigation Plan
MMAA	Master Mutual Air Agreement
MTC	Metropolitan Transportation Commission
NCP	National Contingency Plan
NIMS	National Incident Management System
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NPS	National Parks Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NRP	National Response Plan
NOP	Notice of Preparation
NPL	National Priorities List
NWI	National Wetlands Inventory

NWPRR	Northwest Pacific Railroad Company
OES	Office of Emergency Services (Governor)
PG&E	Pacific Gas & Electric
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Assessment
RWQCB	Regional Water Quality Control Board
SARA	Superfund Amendments and Reauthorization Act
SEMS	(California) Standardized Emergency Management System
SLIC	Spills, Leaks, Investigations, and Cleanups sites
SMART	Sonoma-Marin Area Rail Transit
SSMP	Sewer System Management Plan
SWRCB	State Water Resources Control Board
UGB	Urban Growth Boundary
U.S.	United States
USACE	U.S. Army Corps of Engineers
U.S. EPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	Underground Storage Tank
WFPD	Windsor Fire Protection District
WUSD	Windsor Unified School District

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Executive Summary

The section summarizes the characteristics of the 2040 General Plan, as well as the 2040 General Plan's environmental impacts and recommended mitigation measures.

Project Synopsis

Project Applicant

Town of Windsor
P.O. Box 100
Windsor, California 95492

Project Location

Windsor is located in central Sonoma County, approximately 20 miles east of the Pacific Ocean. The City of Healdsburg is approximately five miles to the northwest and Santa Rosa, the Sonoma County seat, lies seven miles to the southeast. The Town of Windsor encompasses 7.3 square miles (4,672 acres). Future growth and land use changes for the Town of Windsor are limited to the Urban Growth Boundary (UGB). The Windsor UGB currently encompasses 7.5 square miles and includes the incorporated areas of the Town as well as surrounding unincorporated areas that may be affected by the future growth of the Town. This EIR uses the expanded UGB as the land use boundary for the 2040 General Plan as it represents the potential area where land use changes and/or physical changes to the environment may occur as a result of implementation of the General Plan. For the purposes of this EIR the area inside the expanded UGB is defined as the "General Plan Area" for the 2040 General Plan

Project Description

The 2040 General Plan is a comprehensive update of the Town's 1996 General Plan, and establishes the community's vision for future development of the Town over the next 22 years. As part of the general plan process, the 2040 General Plan has been reorganized and reformatted, with updated goals and policies that reflect the community's vision of Windsor. The Town's General Plan Land Use Map has also been updated to reflect the community's vision and three themes that thread through the 2040 General Plan: growth management, sustainability and resiliency, and community health and well-being.

The growth and development in Windsor would be guided by the 2040 General Plan. The 2040 General Plan would maintain the Town's small size and rural atmosphere, while respecting natural resources. Growth within the Town limits is supported by the 2040 General Plan with consideration of the ability to provide public services, fiscal impacts, and infrastructure capacity including water and wastewater capacity and transportation. Infill development would be prioritized to create more efficient and cost effective infrastructure, maximizing underutilized parcels in the Town. Development under the 2040 General Plan would establish a more defined community edge providing a sense of transition between farmland on the Town's edge and development within the Town.

The 2040 General Plan includes the following seven updated Elements: Land Use and Community Design, Economic Development, Transportation and Mobility, Public Facilities and Services, Environmental Resources, Public Health and Safety, and housing. These seven elements describe the existing conditions and context for the related topic areas, followed by goals, policies, and implementation programs to guide the Town's management and development through 2040.

Project Objectives

The 2040 General Plan vision for the future is as follows:

Windsor is a family-oriented small town in the heart of Sonoma county wine country and near the Russian River recreation area that:

- Provides a safe and walkable environment for residents and visitors
- Fosters diversity, collaboration, and civic engagement
- Promotes healthy and active lifestyles for all ages
- Demonstrates leadership and innovation in sustainable practices, development, and public infrastructure
- Supports a vibrant local and regional economy
- Values mobility and accessibility via walking, biking, and high quality public transit

The 2040 General Plan sets the guiding principles for the Town. The guiding principles are contained on pages five through eight of the 2040 General Plan Introduction and abbreviated below:

- Town Identity: family-oriented small town with excellent resources
- Town Green and Downtown: a focal point for the community, public gathering space, and center of the Town
- Economic Vitality and Balance: destination for visitors and tourists and a mix of land uses to support a variety of development
- Community and Neighborhood Design: "Smart Growth Development," visual interest, multiple options for mobility, and attractive open space
- Natural Resources and Agriculture: agricultural defines the rural character, trails and parks, and agricultural farming in harmony with urban uses
- Sustainability and Resilience: stewardship of natural resources, energy efficiency, and sufficient resources

Required Discretionary Approvals

With recommendations from the Town's Planning Commission, the Windsor Town Council will need to take the following discretionary actions in conjunction with the proposed project:

- Certification of the Final EIR
- Approval of the proposed 2040 General Plan

Windsor adopted its current Housing Element in January 2015, covering the period 2015-2023. This Housing Element was submitted to the California Department of Housing and Community

Development (HCD) for review and comment, and the Town received certification of the Housing Element from HCD in February 2015. As noted above in Section 2.6.7, the 2040 General Plan Update does not make any changes to the Housing Element policies; however, it does include an update to the Housing Element sites inventory to ensure consistency with the 2040 General Plan Land Use Diagram changes.

Alternatives

As required by Section 15126(d) of the State CEQA Guidelines, this EIR examines a reasonable range of alternatives to the 2040 General Plan. The alternatives studied in the EIR include the following:

- Alternative 1: No Project
- Alternative 2: Proposed 2040 General Plan Without UGB Renewal and Expansion
- Alternative 3: New Agricultural Designation, No Mixed-Use Outside of Downtown, Less Overall Growth in Town

The California Environmental Quality Act (CEQA) requires that an environmentally superior alternative be identified among those analyzed. It further states that if the No Project Alternative is identified as environmentally superior, the next most environmentally superior alternative must also be identified. When taking into account every environmental impact area, Alternative 3 is the environmentally superior alternative, followed by Alternative 2, and the Alternative 1.

Summary of Impacts and Mitigation Measures

Table 1 lists the environmental impacts of the proposed 2040 General Plan, the proposed mitigation measures, and residual impacts or significance after mitigation. Impacts are defined as significant, unavoidable adverse impacts that require a statement of overriding consideration, pursuant to Section 15093 of the *CEQA Guidelines* if the proposed 2040 General Plan is approved; significant, adverse impacts that can be feasibly mitigated to less than significant levels and that require findings to be made under Section 15091 of the *CEQA Guidelines*; adverse impacts that are less than those allowed by adopted significance thresholds; and no impact.

Table 1 Summary of Environmental Impacts and Mitigation Measures

Impact	Mitigation Measure (s)	Significance After Mitigation
Aesthetics		
Impact AES-1. The 2040 General Plan would facilitate incrementally greater loss of scenic resources visible from public viewpoints than would development under the existing 2015 General Plan. However, implementation of proposed policies would protect distant views of scenic hillsides and ridgelines, minimize degradation of foreground views of scenic resources like agricultural open space and oak trees, and promote the design of visually attractive gateways to Windsor on the scenic Highway 101. Therefore, the 2040 General Plan would have a less than significant impact on scenic vistas and resources.	None required	Less than significant without mitigation
Impact AES-2. The 2040 General Plan would protect Windsor's small town, rural atmosphere	None required	Less than significant without

Impact	Mitigation Measure (s)	Significance After Mitigation
by redesignating land uses for targeted infill development, maintaining development intensities in single-family residential areas, and facilitating the development of distinctive gateways by the northern and southern Town limits. Compliance with existing standards and proposed General Plan policies would ensure that new development complements and enhances the Town's existing visual character and quality. Therefore, the project would have a less than significant impact on visual character and quality.		mitigation
Impact AES-3. New development facilitated by the proposed General Plan could increase light and glare effects on sensitive receptors, such as residential uses. New development would be subject to existing regulations in the Town's Zoning Ordinance and proposed General Plan policy to protect dark skies at nighttime. However, proposed General Plan Policies do not specify how anticipated light and glare would be reduced. Therefore, the project would have a significant but mitigable impact associated with light and glare.	**AES-1 Nighttime lighting Measures.** Land Use Policy LU-1.13 shall be updated to read: ***Design to Protect Night Skies*.** The Town shall protect dark/night skies by requiring outdoor lighting to be shielded and/or directed downward to limit overspill and glare, without compromising the safety and security of the community, through implementation of lighting standards in a "Dark Skies" ordinance with guidance from the Model Lighting Ordinance approved by the International Dark-Sky Association and the Illuminating Engineering Society of North America.	Less than significant
Agricultural Resources		
Impact AG-1. Development proposed in the 2040 General Plan is designed to encourage the continued operation of existing agriculture in and surrounding the Town. However, buildout of the 2040 General Plan would result in the conversion of active agricultural land. Therefore, impacts would be significant and unavoidable.	None available	Significant and unavoidable
Impact AG-2. The General Plan Update would alter the current land use pattern in portions of the Town, including in the southern, northwestern, and eastern edges of the General Plan Area, and may result in incompatibilities where urban and agricultural uses would directly abut each other. However, land use conflicts would be reduced through proposed land buffers and 2040 General Plan policies. Therefore, impacts that would occur from the proximity of agricultural land to urban uses would be less than significant.	None required	Less than significant without mitigation
Air Quality		
Impact AQ-1. Buildout of the 2040 General Plan would result in the temporary generation of air pollutants during construction, which would affect local air quality. ~~Modification~~ Implementation of mitigation ~~2040 General Plan Policy ER-4.3~~ to include the BAAQMD Basic Construction Mitigation Measures would require future projects within the General Plan Area to implement measures to reduce construction emissions. Impacts would be significant but mitigable.	**AQ-1 Construction Emissions Measures.** ~~Environmental Resources Policy ER-4.3 shall be updated to read:~~ The Town shall require that development projects incorporate the Bay Area Air Quality Management District (BAAQMD) Basic Construction Mitigation Measures to reduce construction emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$). The Town shall require the following to be adhered to during project construction to reduce air quality impacts.	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
	During construction activities: 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, with priority given to the use of recycled water for this activity when feasible. 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 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 visible emissions evaluator. 8. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. The Town shall also require that development projects incorporate feasible measures that reduce operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM10 and PM2.5).	
Impact AQ-2. The 2040 General Plan would be consistent with BAAQMD's 2017 Clean Air Plan and the rate of increase for Vehicle Miles Traveled under buildout of the 2040 General Plan would not exceed the rate of projected population increase associated with the 2040 General Plan. Impacts would be less than significant.	None required	Less than significant without mitigation
Impact AQ-3. The 2040 General Plan would not create objectionable odors that would affect neighboring properties. Impacts related to odors would be less than significant.	None required	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
Biological Resources		
Impact BIO-1. With implementation of the goals and policies in the 2040 General Plan and Mitigation Measure AES-1 to reduce light and glare, direct and indirect impacts to listed special-status species and sensitive habitats would be avoided. Impacts would therefore be less than significant with mitigation incorporated**.**	Mitigation Measures AES-1	Less than significant
Impact BIO-2. Implementation of the 2040 General Plan would not result in a reduction in nesting opportunities for resident and migratory avian species of special concern because of conservation and preservation policies within the 2040 General Plan and compliance with the Migratory Bird Treaty Act. However, new development under the 2040 General Plan may impact special-status nesting birds; impacts would be significant but mitigable.	**BIO-1 Nesting Bird Protection ~~Policy~~.** ~~The following policy shall be added to the 2040 General Plan Environmental Element as Policy ER-6.12:~~ The Town shall require project applicants to retain the services of a qualified biologist(s) to conduct a pre-construction nesting bird survey during the nesting season (February 1 through August 31) prior to all new development that may remove any trees or vegetation that may provide suitable nesting habitat for migratory birds or other special-status bird species. If nests are found the qualified biologist(s) shall identify appropriate avoidance measures.	Less than significant
Impact BIO-3. While the 2040 General Plan would not facilitate development that would directly impact riparian and wetland habits, there would be potential for adverse indirect impacts from such development on wetlands and areas under the jurisdiction of the CDFW and USACE. However, compliance with existing regulations, and implementation of 2040 General Plan policies would reduce potential impacts to a less than significant level.	None required	Less than significant without mitigation
Impact BIO-4. Development carried out under the 2040 General Plan would largely avoid impacts to wildlife movement corridors by conservation of natural areas contained in policies of the 2040 General Plan. However, there are no specific policies preserving wildlife movement corridors and impacts would be significant but mitigable.	**BIO-2 Wildlife Movement Corridors Protection Policy.** The 2040 General Plan Environmental Resources Element Policy ER-1.2 shall be updated to read: **Policy ER-1.2 *Sensitive Habitat Preservation***. The Town shall encourage the preservation of sensitive environmental habitat areas, such as oak woodlands, productive farmlands, ~~and~~ riparian (creekside) corridors, <u>and important wildlife movement corridors</u> through measures such as clustering development and conservation easements.	Less than significant
Impact BIO-5. Development proposed by the 2040 General Plan would conform with applicable local policies protecting biological resources and underscore their importance with strengthened policy statements. Impacts would be less than significant.	None required	Less than significant without mitigation
Impact BIO-6. Windsor is located in the Santa Rosa Conservation Strategy planning area that identifies areas in Windsor for plant conservation. Impacts to areas identified in the Santa Rosa Conservation Strategy would be protected by conservation strategies contained	None required	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
in goals and policies of the 2040 General Plan. Impacts would be less than significant.		
Cultural Resources		
Impact CR-1. Development facilitated by the 2040 General Plan has the potential to impact historical and unique archaeological resources. Impacts would be less than significant with mitigation incorporated.	**CR-1 Cultural Resources Study Implementation Program.** The following Implementation Program shall be added to the 2040 General Plan: If the preliminary reconnaissance required under Policy ER-7.10 suggests that significant historic resources, cultural resources, or tribal cultural resources may exist or for any other project requiring discretionary approval where there will be substantial ground disturbance by the project, the applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in archaeology and/or an architectural historian meeting the SOI PQS standards in architectural history to complete a Phase 1 cultural resources inventory of the project site (NPS 1983). A Phase 1 cultural resources inventory should include a pedestrian survey of the project site and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC). The technical report documenting the Phase 1 cultural resources inventory shall include recommendations to avoid or reduce impacts to cultural resources. **CR-2 Tribal Cultural Resources Consultation.** Mitigation Measure CR-1 shall apply to all discretionary projects. Where potential tribal cultural resources are encountered or revealed through the Phase 1 Survey, the Town will consult with applicable tribe(s) to determine appropriate measures for addressing the resources.	Less than significant
Impact CR-2. Development facilitated by the 2040 General Plan has the potential to impact paleontological resources. Impacts would be less than significant with mitigation incorporated.	**CR-~~2~~3 Paleontological Resource Studies.** The following Implementation Program shall be added to the 2040 General Plan: For any development in Windsor that occurs within high sensitivity geologic units, whether they are mapped at the surface or hypothesized to occur in the subsurface, the Town shall require a paleontological assessment, and avoidance and/or mitigation for potential impacts to paleontological resources. The Town shall require the following specific requirements for projects that could disturb geologic units with high paleontological sensitivity, whether they are mapped at the surface or hypothesized to occur in the subsurface. 1. **Retain a Qualified Paleontologist**. Prior to initial ground disturbance that occurs within highly sensitive geologic units, the applicant shall retain a project paleontologist, defined as a paleontologist who meets the SVP (2010)	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
	standards for Qualified Professional Paleontologist, to direct all mitigation measures related to paleontological resources. A qualified paleontologist (Principal Paleontologist) is defined by the SVP standards as an individual with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least one year. 2. **Paleontological Mitigation and Monitoring Program**. Prior to construction activity, a qualified paleontologist should prepare a Paleontological Mitigation and Monitoring Program to be implemented during ground disturbance activity for the proposed project. This program should outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological staff qualifications. 3. **Paleontological Worker Environmental Awareness Program (WEAP).** Prior to the start of construction, the project paleontologist or his or her designee, shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be fulfilled at the time of a preconstruction meeting at which a qualified paleontologist shall attend. In the event of a fossil discovery by construction personnel, all work in the immediate vicinity of the find shall cease and a qualified paleontologist shall be contacted to evaluate the find before restarting work in the area. If it is determined that the fossil(s) is (are) scientifically significant, the qualified paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources. 4. **Paleontological Monitoring**. Ground disturbing construction activities (including grading, trenching, foundation work and other excavations) at the surface in areas mapped as high paleontological sensitivity and exceeding 5 feet in depth in areas overlying potentially high paleontological sensitivity units should be monitored on a full-time basis by a qualified paleontological monitor during initial ground disturbance. The Paleontological Mitigation and Monitoring Program shall be supervised by the project paleontologist. Monitoring should be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of	

Impact	Mitigation Measure (s)	Significance After Mitigation
	paleontological resources. The duration and timing of the monitoring will be determined by the project paleontologist. If the project paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring would be reinstated if any new or unforeseen deeper ground disturbances are required and reduction or suspension would need to be reconsidered by the Supervising Paleontologist. Ground disturbing activity that does not occur in areas mapped as high sensitivity or that do not exceed 5 feet in depth in areas overlying potentially high sensitivity units would not require paleontological monitoring. 5. **Salvage of Fossils**. If significant fossils are discovered, the project paleontologist or paleontological monitor should recover them. Typically fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist should have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Work may continue outside of a buffer zone around the fossil, usually 50-100 feet (specific distance may be determined by the project paleontologist). 6. **Preparation and Curation of Recovered Fossils**. Once salvaged, significant fossils should be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the University of California Museum of Paleontology), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist. 7. **Final Paleontological Mitigation Report**. Upon completion of ground disturbing activity (and curation of fossils if necessary) the qualified paleontologist should prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report should include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.	
Impact CR-3. Ground-disturbing activities associated with development under the proposed 2040 General Plan could result in	~~**None required**~~ **CR-4 Human Remains.** If human remains are	Less than significant without

Impact	Mitigation Measure (s)	Significance After Mitigation
damage to or destruction of human burials. Impacts would be less than significant.	encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines that remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.	mitigation
Geology and Soils		
Impact GEO-1. Construction and occupancy of new buildings under the 2040 General Plan could result in exposure of people or structures to a risk of loss, injury, or death from seismic events. Adherence to the requirements of the California Building Code and implementation of the goals and policies of the 2040 General Plan would minimize the potential for loss, injury, or death following a seismic event and would reduce this impact to a less-than-significant level	None required	Less than significant without mitigation
Impact GEO-2. Construction of new development under the 2040 General Plan would include ground disturbance such as excavation and grading that would result in loose or exposed soil. This disturbed soil could be eroded by wind or during a storm event, which would result in the loss of topsoil. Compliance with applicable regulations, including the Clean Water Act, and implementation of the goals and policies of the 2040 General Plan would minimize the potential for erosion and loss of topsoil and would reduce this potential impact to a less-than-significant level.	None required	Less than significant without mitigation
Impact GEO-3. Development facilitated by the 2040 General Plan may result in the construction of structures on expansive soils, which could create a substantial risk to life or property. However, all new development would be required to comply with the standards of the California Building Code, which would ensure that expansive soils are remediated or that foundations and structures are engineered to withstand the forces of expansive soil. Compliance with the requirements of the California Building Code would reduce this impact to a less-than-significant level.	None required	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact GEO-4. New development facilitated by the 2040 General Plan will occur primarily where existing sewer systems are in place. However, Rural Residential is an allowed land use under the 2040 General Plan. This type of development typically does not have urban services such as sanitary sewer systems. New Rural Residential development under the 2040 General Plan may require the use of septic systems or alternative wastewater disposal systems. Without proper site investigation, these systems may be constructed on soils incapable of adequately supporting their use. Implementation of mitigation to require a soil investigation prior to the construction of a new septic tank or alternative wastewater disposal system would reduce this impact to a less-than-significant level.	**GEO-1. Soil Investigations for Septic System Policy.** The following policy shall be added to the Public Facilities and Services Element under Goal PFS-3, Wastewater and Water Reclamation System: **Policy PFS-3.12** ***Soil Investigations for Septic Tanks***. For new Rural Residential (RR) development or other residential development projects not connected to the sewer system and requiring the use of septic tanks or alternative wastewater disposal systems, the Town shall require that a soil investigation be submitted for review and approval that demonstrates the capability of the underlying soils to support the use of septic tanks or alternative wastewater disposal systems.	Less than significant
Greenhouse Gas Emissions		
Impact GHG-1. Development facilitated by the 2040 General Plan would generate GHG emissions that would not exceed the BAAQMD recommended threshold of 6.6 MT CO_2e. In addition, policies contained in the 2040 General Plan would ensure that development under the 2040 General Plan would follow a reduction trajectory that meets the 2050 statewide emissions target. Impacts would therefore be less than significant.	None required	Less than significant without mitigation
Impact GHG-2. The 2040 General Plan would be consistent with measures contained in the Windsor Greenhouse Gas Reduction Action Plan and therefore would not conflict with State policies or regulations and would be less than significant.	None required	Less than significant without mitigation
Hazards and Hazardous Materials		
Impact HAZ-1. Implementation of the 2040 General Plan could result in an incremental increase in the overall routine transport, use, storage, and disposal of hazardous materials within the Town and increase the risk of release of hazardous materials. However, compliance with applicable regulations related to the handling and storage of hazardous materials and adherence to proposed 2040 General Plan policies would minimize the risk of spills and the public's potential exposure to these substances. Impacts would be less than significant.	None required	Less than significant without mitigation
Impact HAZ-2. Implementation of the proposed project could result in hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school, but compliance with existing regulatory requirements would minimize risks to schools and students, resulting in a less than significant impact.	None required	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact HAZ-3. Implementation of the 2040 General Plan could result in development on sites contaminated with hazardous materials. However, compliance with applicable regulations relating to site cleanup and 2040 General Plan policies would minimize impacts from development on contaminated sites, resulting in a less than significant impact.	None required	Less than significant without mitigation
Impact HAZ-4. The southern portion of Windsor is inside the area of influence for the Charles M. Shultz-Sonoma County Airport and could result in safety hazards for people working or residing in the area of influence. Impacts would be avoided through implementation of goals and policies in the 2040 General Plan and hazardous impacts to people working and residing within the airport area of influence would therefore be less than significant.	None required	Less than significant without mitigation
Impact HAZ-5. The 2040 General Plan policies address maintaining a Local Hazard Mitigation Plan and emergency access implementation. Therefore, the proposed project would not result in interference with these types of adopted plans. Impacts would be less than significant.	None required	Less than significant without mitigation
Impact HAZ-6. Implementation of the proposed project could result in development in urbanized areas adjacent to wildlands. However, implementation of policies included in the 2040 General Plan, would reduce the exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.	None required	Less than significant without mitigation
Hydrology and Water Quality		
Impact HYD-1. Construction and occupancy of new structures under the 2040 General Plan could result in a discharge of pollutants to surface waters or contamination of shallow groundwater through increased soil disturbance and erosion, discharge of contaminated wastewater or storm water, or accidental spills or leaks of hazardous materials. Compliance with applicable laws and regulations and implementation of the goals and policies of the 2040 General Plan would minimize the potential for water quality degradation and would reduce this impact to a less-than-significant level.	None required	Less than significant without mitigation
Impact HYD-2. Construction and occupancy of new structures under the 2040 General Plan could result in the depletion of groundwater supplies or the interference with groundwater recharge. Implementation of the goals and policies of the 2040 General Plan would maximize the potential for infiltration and ensure the sustainable use of groundwater, and would reduce this impact to a less-than-	None required	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
significant level.		
Impact HYD-3. Development facilitated by the 2040 General Plan could alter the existing drainage patterns in the Town and potentially result in erosion and siltation. Compliance with applicable regulations, including the Clean Water Act, and implementation of the goals and policies of the 2040 General Plan would minimize the potential for erosion and siltation and would reduce this potential impact to a less-than-significant level.	None required	Less than significant without mitigation
Impact HYD-4. Development facilitated by the 2040 General Plan could alter the existing drainage patterns and increase the amount of runoff throughout the Town, which could result in flooding on- or off-site, exceed the capacity of existing or planned storm water drainage systems, or create substantial additional sources of polluted runoff. Compliance with applicable regulations and implementation of the goals and policies of the 2040 General Plan would minimize the potential for increased runoff and flooding and would reduce this potential impact to a less-than-significant level.	None required	Less than significant without mitigation
Impact HYD-5. Development facilitated by the 2040 General Plan could place housing or structures in a flood hazard area and expose people or structures to a significant risk of loss, injury, or death involving flooding. Compliance with applicable regulations and implementation of the goals and policies of the 2040 General Plan would protect structures from adverse effects related to flooding, would minimize the exposure of people or structures to flooding, and would reduce this potential impact to a less-than-significant level.	None required	Less than significant without mitigation
Impact HYD-6. Development facilitated by the 2040 General Plan could expose people or structures to a significant risk of loss, injury, or death involving mudflow. Compliance with applicable regulations and implementation of the goals and policies of the 2040 General Plan would minimize the potential for adverse effects related to mudflow and would reduce this potential impact to a less-than-significant level.	None required	Less than significant without mitigation
Land Use and Planning		
Impact LU-1. Implementation of the proposed 2040 General Plan would provide for orderly development in the Town of Windsor and would not physically divide an established community. Impacts would be less than significant.	None required	Less than significant without mitigation
Impact LU-2. Implementation of the proposed project would be generally consistent with applicable regional land use plans, policies, or regulations such as ABAG/MTC's Plan Bay Area 2040. Impacts would be less than significant.	None required	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
Impact LU-3. Implementation of the proposed project would not conflict with the Sonoma County Comprehensive Airport Land Use Plan. Impacts would be less than significant.	None required	Less than significant without mitigation
Impact LU-4. Implementation of the proposed project would not conflict with any applicable habitat conservation plan or natural community conservation plan. Impacts would be less than significant.	None required	Less than significant without mitigation
Noise		
Impact N-1. Construction of individual projects facilitated by the 2040 General Plan would temporarily produce high noise levels, potentially affecting adjacent noise-sensitive land uses. Although the Code of the Town of Windsor's timing restrictions on construction activity would limit noise disturbance, high noise levels during working construction hours could adversely affect noise-sensitive receptors. Impacts would be significant but mitigable.	**N-1. Construction Noise Control Measures.** ~~The following policy shall be added to the Public Health and Safety Element under Goal PHS-8, Noise:~~ ~~**Policy PHS-8.18** ***Construction Noise Control Measures.***~~ The following noise control measures shall be included as standard conditions of approval for projects involving construction: 1. Properly muffle and maintain all construction equipment powered by internal combustion engines. 2. Prohibit unnecessary idling of combustion engines. 3. Locate all stationary noise-generating construction equipment such as air compressors as far as practical from existing nearby residences and other noise-sensitive land uses. Such equipment shall also be acoustically shielded. 4. Select quiet construction equipment, particularly air compressors, whenever possible. Fit motorized equipment with proper mufflers in good working order. 5. Residences adjacent to project sites shall be notified in advance by writing of the proposed construction schedule before construction activities commence. 6. The project applicant shall designate a "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint (e.g., starting too early, bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator shall be posted at the construction site.	Less than significant
Impact N-2. Construction of individual projects facilitated by the 2040 General Plan could temporarily generate groundborne vibration, potentially affecting adjacent sensitive land uses. Although the Code of the Town of Windsor's timing restrictions on construction activity would limit vibration disturbance, high vibration levels during working construction hours could potentially disturb people or	**N-2. Construction Vibration Control Measures.** ~~The following policy shall be added to the Public Health and Safety Element under Goal PHS-8, Noise:~~ ~~**Policy PHS-8.19** ***Construction Vibration Control Measures.***~~ The following measures to minimize exposure to construction vibration shall be included as standard conditions of approval for applicable projects involving construction: 1. Avoid the use of vibratory rollers within 50 feet	Less than significant

Impact	Mitigation Measure (s)	Significance After Mitigation
damage fragile buildings. This impact would be less than significant with mitigation to apply standard vibration control measures and to notify neighbors of construction activity.	of fragile buildings, which are buildings that are susceptible to damage from vibration. 2. Schedule construction activities with the highest potential to produce vibration to hours with the least potential to affect nearby institutional, educational, and office uses that the Federal Transit Administration identifies as sensitive to daytime vibration (FTA 2006). 3. Notify neighbors of scheduled construction activities that would generate vibration.	
Impact N-3. Development facilitated by the proposed project could incrementally increase traffic and associated noise levels along Town roadways and Highway 101. With the future extension of the SMART passenger rail line through Windsor, train noise also would increase in the Plan Area. Noise-sensitive land uses located near major roadways and rail lines would be exposed to incrementally greater noise levels. However, implementation of policies in the 2040 General Plan would reduce impacts to a less than significant level.	None required	Less than significant without mitigation
Impact N-4. New development facilitated by the 2040 General Plan would introduce new on-site noise sources associated with residential, commercial, and industrial land uses. The continued regulation of on-site noise, consistent with the Town of Windsor Zoning Ordinance, would minimize disturbance to adjoining uses. Therefore, the project would have a less than significant impact related to on-site operational noise.	None required	Less than significant without mitigation
Impact N-5. The 2040 General Plan would facilitate new development including future residences and other noise-sensitive land uses that would be exposed to noise levels exceeding the “normally acceptable” range. However, implementation of policies in the 2040 General Plan would reduce impacts to a less than significant level.	None required	Less than significant without mitigation
Population and Housing		
Impact POP-1. Full buildout of the 2040 General Plan would accommodate an estimated 11,067 new residents, 3,910 new housing units, and 2,860 new jobs in the Town. This would exceed the ABAG and SCTA Comprehensive Transportation Plan forecasts. However, the 2040 General Plan is intended to accommodate regional housing needs and includes policies to manage new development and limit growth in such a way to minimize environmental impacts. Therefore, impacts would be less than significant.	None required	Less than significant without mitigation
Impact POP-2. Implementation of the 2040 General Plan would not displace substantial numbers of existing housing or people, necessitating the construction of replacement	None required	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
housing elsewhere. Impacts would be less than significant.		
Public Services		
Impact PS-1. Development facilitated by the proposed 2040 General Plan would result in an increase to the Town's population. This would increase demand for fire, police, and emergency medical services and potentially create the need for new police, fire, or other service facilities. However, compliance with policies in the 2040 General Plan, as well as the town's management of growth, would reduce impacts related to the construction of fire, police, and other service facilities to a less than significant level.	None required	Less than significant without mitigation
Impact PS-2. Development facilitated by the 2040 General Plan would allow for an increase in the Town's population. This would increase demand for schools and libraries and potentially create the need for new school or library facilities. However, compliance with goals and policies in the 2040 General Plan, as well as the town's management of growth, would reduce impacts related to the construction of school or library facilities to a less than significant level.	None required	Less than significant without mitigation
Transportation and Traffic		
Impact T-1. New development facilitated by the 2040 General Plan may increase traffic at certain locations in Windsor. This traffic may conflict with policies and thresholds for the performance of the circulation system and applicable congestion management programs. Impacts would be significant but mitigable.	**T-1. Intersection Improvements.** The following additional intersection improvements are necessary to maintain acceptable operation with the 2040 volumes anticipated under the 2040 General Plan. ▪ Add a second left-turn lane on northbound **Old Redwood Highway at Starr Road** together with a second receiving lane southbound on Starr Road. ▪ Add an eastbound left-turn lane on Windsor **River Road at Bell Road-Market Street** to operate under permitted left-turn phasing. ▪ Provide a second left-turn lane on northbound **Old Redwood Highway at Shiloh Road**; this will require a second westbound lane on Shiloh Road.	Less than significant
Impact T-2. The 2040 General Plan would not result in a change in air traffic patterns and would not affect the Charles M. Schulz- Sonoma County Airport. Impacts to air traffic patterns would be less than significant.	None required	Less than significant without mitigation
Impact T-3. New development facilitated by the 2040 General Plan may increase traffic at certain locations in Windsor. This traffic may have the potential to cause queuing that exceeds available storage area resulting in traffic related hazards. Proposed Transportation and Mobility Element policies would reduce most impacts to a less than significant level. However, queuing beyond acceptable levels at certain intersections would still occur and may result in traffic hazards; therefore, impacts would be significant	**T-2. Queuing Improvements.** The following improvements are necessary to mitigate impacts from queuing based on the traffic volumes anticipated under the 2040 General Plan. ▪ Provide dual left-turn lanes on northbound **Old Redwood Highway at Starr Road** per Mitigation Measure T-1. ▪ Provide at least 250 feet of stacking space on the eastbound approach to **Highway 101 North ramps/Arata Lane** when the interchange is modified to provide all of the travel lanes	Significant and Unavoidable

Impact	Mitigation Measure (s)	Significance After Mitigation
	needed to accommodate future volumes. ▪ Widen **Arata Lane** to provide at least 275 feet of stacking space for the left-turn pocket on the eastbound approach to Los Amigos Road. ▪ Limit access at **Windsor River Road/Bill Beedie Way** to right turns in/out only and extend the left-turn pocket to 700 feet or convert **Windsor River Road/Windsor Road** to a modern roundabout. ▪ Lengthen the left-turn lane on the north-bound **Old Redwood Highway** approach to Conde Lane to 325 feet. ▪ Lengthen the left-turn pocket on the southbound approach to **Shiloh Road** at **Skylane Boulevard** to 125 feet. ▪ Lengthen the left-turn pocket on westbound **Shiloh Road at Caletti Avenue** to 125 feet. ▪ Provide dual left-turn lanes with at least 300 feet of stacking space on northbound **Old Redwood Highway at Shiloh Road.**	
Impact T-4. Due to the programmatic nature of the 2040 General Plan, and the proposed policies and implementation measures to create an integrated, multi-modal transportation system, the 2040 General Plan would not result in inadequate emergency access. Impacts would be less than significant.	None required	Less than significant without mitigation
Impact T-5. The focus of the proposed 2040 General Plan in terms of transportation is to address a balanced transportation network that will support and encourage walking, bicycling, and transit ridership; conserve energy resources; and reduce greenhouse gas emissions, while continuing to accommodate automobile travel. The 2040 General Plan therefore would not conflict with adopted policies relating to alternative transportation modes, including transit, walking, and bicycling. Proposed Town of Windsor Transportation and Mobility Element policies would reduce these impacts to a less than significant level.	None required	Less than significant without mitigation
Utilities and Service Systems		
Impact UTL-1. Development facilitated by the proposed project would increase demand for water supply. However, with adherence to 2040 General Plan policies the Town would have adequate water supplies to support new development anticipated in the 2040 General Plan. Impacts would be less than significant.	None required	Less than significant without mitigation
Impact UTL-2. Development facilitated by the proposed project would increase demand for wastewater collection and treatment but goals and policies in the 2040 General Plan would ensure sufficient wastewater treatment capacity. Impacts would be less than significant.	None required	Less than significant without mitigation
Impact UTL-3. Development facilitated by the	None required	Less than

Impact	Mitigation Measure (s)	Significance After Mitigation
proposed project would increase demand for solid waste sent to area landfills. However, landfills serving the Town of Windsor have adequate capacity to accept the additional waste. Further, the 2040 General Plan contains policies to increase recycling. Impacts would be less than significant.		significant without mitigation
Impact UTL-4. Development facilitated by the proposed project would increase demand for storm water conveyance, but policies to encourage low impact development and other policies will limit any impact. Impacts would be less than significant.	None required	Less than significant without mitigation
Tribal Cultural Resources		
Impact TCR-1. Development facilitated by the proposed General Plan may involve surface excavation, which has the potential to impact previously unidentified tribal cultural resources. However, with adherence to policies contained in the 2040 General Plan Update, impacts to tribal cultural resources would be less than significant.	~~None required~~ **CR-1 Cultural Resources Study Implementation Program.** The following Implementation Program shall be added to the 2040 General Plan: If the preliminary reconnaissance required under Policy ER-7.10 suggests that significant historic resources, cultural resources, or tribal cultural resources may exist or for any other project requiring discretionary approval where there will be substantial ground disturbance by the project, the applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in archaeology and/or an architectural historian meeting the SOI PQS standards in architectural history to complete a Phase 1 cultural resources inventory of the project site (NPS 1983). A Phase 1 cultural resources inventory should include a pedestrian survey of the project site and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC). The technical report documenting the Phase 1 cultural resources inventory shall include recommendations to avoid or reduce impacts to cultural resources. **CR-2 Tribal Cultural Resources Consultation.** Mitigation Measure CR-1 shall apply to all discretionary projects. Where potential tribal cultural resources are encountered or revealed through the Phase 1 Survey, the Town will consult with applicable tribe(s) to determine appropriate measures for addressing the resources. **CR-4 Human Remains.** If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be list in place and free from disturbance until a final decision as to the treatment	Less than significant without mitigation

Impact	Mitigation Measure (s)	Significance After Mitigation
	and disposition has been made. If the County Coroner determines that remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.	

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1 Introduction

This Environmental Impact Report (EIR) examines the potential environmental effects of the proposed Town of Windsor 2040 General Plan, defined as the proposed project or as the 2040 General Plan for purposes of this environmental review. The environmental review process for the proposed project, and legal basis for preparing an EIR, are described below.

This section:

1 Provides an overview of the background behind the proposed project
2 Summarizes the process involved in developing the proposed project
3 Describes the purpose of and legal authority of the EIR
4 Summarizes the scope and content of the EIR
5 Lists lead, responsible, and trustee agencies for the EIR
6 Describes the intended uses of the EIR
7 Provides a synopsis of the environmental review process required under CEQA

The contents of other EIR sections are as follows:

- Section 2, *Project Description*, provides a detailed discussion of the proposed project
- Section 3, *Environmental Setting*, describes the general environmental setting for the Town of Windsor
- Section 4*, Environmental Impact Analysis*, describes the potential environmental effects associated with development facilitated by the proposed project
- Section 5*, Other CEQA Required Sections*, discusses issues such as growth inducement, energy and significant irreversible environmental effects
- Section 6, *Alternatives*, discusses alternatives to the proposed project, including the CEQA-required "no project" alternative
- Section 7, *References and Report Preparers*, lists informational sources for the EIR and persons involved in the preparation of the document

1.1 Overview of the 2040 General Plan

State law (Government Code Section 65300) requires that each city and county adopt a comprehensive general plan. The existing Town of Windsor General Plan was adopted by the Town Council on March 13, 1996. The Town of Windsor 2040 General Plan Update is a comprehensive effort to update the existing 1996 General Plan and responds to current local and regional conditions, as well as changes in State law that may not have been in effect when the General Plan was last updated. The 2040 General Plan has been organized into seven elements: Land Use and Community Design; Economic Development; Public Facilities and Services; Transportation and Mobility; Environmental Resources; Public Health and Safety; and Housing. The General Plan Housing Element was last updated in January 2015, covering the period 2015-2023, and was subject to a separate environmental review process. The 2040 General Plan Update incorporates the adopted 2015 Housing Element. No substantive changes are being proposed to the Housing Element

as part of its incorporation into the 2040 General Plan Update. However, the Housing Element sites inventory has been updated to ensure consistency with the 2040 General Plan Land Use Diagram changes. The update maintains a surplus of residentially zoned land at appropriate densities to meet the Regional Housing Needs Assessment (RHNA).

Together these seven elements cover all of the topics that are required to be included in a General Plan under State law, which are Land Use, Open Space, Conservation, Housing, Circulation, Safety, and Noise.

The General Plan defines the policy framework by which the Town's physical and economic resources are to be managed and used over the next 22 years. Town decision-makers will use the 2040 General Plan as a blueprint for:

- Choices about the use of land
- Protection of environmental resources
- Conservation and development of housing
- Provision of supporting infrastructure and public and human services
- Protection of people and property from natural and man-made hazards

The 2040 General Plan clarifies and articulates the Town's intentions with respect to the rights and expectations of various community stakeholders, including residents, property owners, and business owners. Through the General Plan, the Town informs these groups of its goals, policies, and standards, and thereby communicates expectations of the public and private sectors for meeting community objectives.

Since the 2040 General Plan serves as a constitution for future development in Windsor, any decision by the Town affecting land use and development must be consistent with the General Plan. This includes development projects that may be proposed in the future. An action, program, or project would be considered consistent with the General Plan if, considering all of its aspects, it will further the objectives and policies of the General Plan or not obstruct their attainment.

The 2040 General Plan contains goals, policies, and implementation programs to implement the Town's overarching objectives. Goals are statements that provide direction and state the desired end condition. Policies establish basic courses of action to achieve these goals, and directly guide the response of elected and appointed officials to development proposals and related community actions. Implementation programs are specific actions, procedures, standards or techniques that the Town must take to help achieve a specified goal or implement an adopted policy.

1.2 Purpose and Legal Authority

This EIR has been prepared in accordance with CEQA and the *State CEQA Guidelines*. In accordance with Section 15121 (a) of the *State CEQA Guidelines* (California Code of Regulations, Title 14, Division 6, Chapter 3), the purpose of an EIR is to:

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

This EIR fulfills the requirements for a Program EIR. Although the legally required contents of a Program EIR are the same as those of a Project EIR, Program EIRs are by necessity more conceptual and may contain a more general discussion of impacts, alternatives, and mitigation measures than a

Project EIR. As provided in Section 15168 of the *State CEQA Guidelines*, a Program EIR may be prepared on a series of actions that may be characterized as one large project. Use of a Program EIR provides the Town (as Lead Agency) with the opportunity to consider broad policy alternatives and program-wide mitigation measures and provides the Town with greater flexibility to address environmental issues and/or cumulative impacts on a comprehensive basis. Agencies generally prepare Program EIRs for programs or a series of related actions that are linked geographically, are logical parts of a chain of contemplated events, rules, regulations, or plans that govern the conduct of a continuing program, or are individual activities carried out under the same authority and having generally similar environmental effects that can be mitigated in similar ways. By its nature, a Program EIR considers the broad effects associated with implementing a program (such as a General Plan or Specific Plan) and does not, and is not intended to, examine the specific environmental effects associated with specific projects that may be accommodated by the provisions of General or Specific Plans.

Once a Program EIR has been prepared, subsequent activities within the program must be evaluated to determine what, if any, additional CEQA documentation needs to be prepared. If the Program EIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the Program EIR scope and additional environmental documentation may not be required (CEQA Guidelines Section 15168(c)). When a Lead agency relies on a Program EIR for a subsequent activity, it must incorporate applicable mitigation measures and alternatives developed in the Program EIR into the subsequent activities (CEQA Guidelines Section 15168(c)(3)). If a subsequent activity would have effects not contemplated or not within the scope of the Program EIR, the Lead Agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or a project level EIR. In this case, the Program EIR still serves a valuable purpose as the first-tier environmental analysis. The *State CEQA Guidelines* (Section 15168(b)) encourage the use of Program EIRs, citing five advantages:

1. Provision of a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR.
2. Focus on cumulative impacts that might be slighted in a case-by-case analysis.
3. Avoidance of continual reconsideration of recurring policy issues.
4. Consideration of broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them.
5. Reduction of paperwork by encouraging the reuse of data (through tiering).

As a wide-ranging environmental document, the Program EIR uses expansive thresholds as compared to the project-level thresholds that might be used for an EIR on a specific development project. It should not be assumed that impacts determined not to be significant at a program level would not be significant at a project level. In other words, determination that implementation of the proposed project as a program would not have a significant environmental effect does not necessarily mean that an individual project would not have significant effects based on project-level CEQA thresholds, even if the project is consistent with the 2040 General Plan.

This EIR has been prepared to analyze potentially significant environmental impacts associated with future development resulting from implementation of the 2040 General Plan, and also addresses appropriate and feasible mitigation measures or project alternatives that would minimize or eliminate these impacts. Additionally, this EIR will provide the primary source of environmental

information for the Town of Windsor, which is the Lead Agency, to use when considering the proposed project.

This EIR is intended to provide decision-makers and the public with information that enables intelligent consideration of the environmental consequences of the proposed project. This EIR identifies significant or potentially significant environmental effects, as well as ways in which those impacts can be reduced to less-than-significant levels, whether through the imposition of mitigation measures or through the implementation of specific alternatives to the proposed project. In a practical sense, this document functions as a tool for fact-finding, allowing concerned citizens and agency staff an opportunity to collectively review and evaluate baseline conditions and project impacts through a process of full disclosure.

1.3 Scope and Content

In accordance with the *State CEQA Guidelines*, a Notice of Preparation (NOP) of a Draft EIR was circulated to potentially interested parties on November 30, 2016. The NOP, included in Appendix A, indicated that all issues on the Town's environmental checklist would be discussed in the EIR. These include:

- Aesthetics
- Agriculture Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation/Traffic
- Tribal Cultural Resources
- Utilities
- Mandatory Findings of Significance

This EIR evaluates potential impacts in each of these areas.

The focus of this EIR is to:

- Provide information about the 2040 General Plan for consideration by the Town Council in its selection of the proposed project, an alternative to the proposed project, or a combination of various elements from the proposed project and its alternatives, for approval
- Review and evaluate the potentially significant environmental impacts that could occur as a result of the growth and development envisioned in the 2040 General Plan
- Identify feasible mitigation measures that may be incorporated into the 2040 General Plan in order to reduce or eliminate potentially significant effects
- Disclose any potential growth-inducing and/or cumulative impacts associated with the proposed project
- Examine a reasonable range of alternative growth scenarios (including growth according to the existing General Plan, reduced growth, and alternative locations within the Town for growth) that could feasibly attain the basic objectives of the proposed project, while eliminating and/or reducing some or all of its potentially significant adverse environmental effects

The Town staff circulated a NOP of this EIR and received six written responses. The responses, included in Appendix A, are addressed, as appropriate, in the analysis contained in the various subsections of Section 4, *Environmental Impact Analysis*. The Town staff also conducted an EIR scoping meeting on January 5, 2017 at Town Hall with a number of members of the public in attendance. A summary of the written comments received at this meeting is included at the end of Appendix A.

Concurrent with the 2040 General Plan Update, the Town of Windsor is proposing that the Town's Urban Growth Boundary (UGB) be renewed for 22 years to coincide with the horizon year of the General Plan Update. The Town is also proposing that the UGB be expanded to include an additional 22.5 acres of land, representing less than one-half of one percent of the total land area within the current Town limits. Renewal and expansion of the UGB will require approval of a ballot measure by voters. The Town Council has authorized placement of the measure on the November 2017 election ballot.

The 2040 General Plan Update and this EIR anticipate renewal and expansion of the UGB, with the expanded properties being designated for light industrial and public uses. Therefore, this EIR uses the expanded UGB as the land use boundary for the 2040 General Plan. A separate CEQA document analyzing potentially significant environmental impacts associated with inclusion of the expansion properties in the UGB and their future development with light industrial and public uses has been prepared and adopted by the Town Council independently from this EIR on June 7, 2017 (Resolution No. 3369-17).

1.4 Lead, Responsible, and Trustee Agencies

The Town of Windsor is the lead agency under CEQA for this EIR because it has primary discretionary authority to determine whether or how to approve the proposed project.

Section 15381 of the *State CEQA Guidelines* defines responsible agencies as other public agencies that are responsible for carrying out/implementing a specific component of a proposed project or for approving a project (such as an annexation) that implements the goals and policies of a General Plan.

There are no responsible agencies for the proposed project.

Although not responsible agencies under CEQA, several other agencies have review authority over aspects of the proposed project or approval authority over projects that could potentially be implemented in accordance with various objectives and policies included in the 2040 General Plan. These agencies and their roles are listed below.

- The State Geologist is responsible for the review of the Town's program for minimizing exposure to geologic hazards and for regulating surface mining activities.
- The Sonoma Local Agency Formation Commission (LAFCO) has responsibility for approving any annexations to the Town that might occur over the life of the 2040 General Plan.
- The California Department of Transportation (Caltrans) has responsibility for approving future improvements to the state highway system, including Highway 101.
- The California Department of Fish and Wildlife (CDFW) has responsibility for issuing take permits and streambed alteration agreements for any projects with the potential to affect plant or

animal species listed by the State of California as rare, threatened, or endangered or that would disturb waters of the State.

- Any other public agencies which may own land within Town boundaries.

Trustee agencies have jurisdiction over certain resources held in trust for the people of California but do not have a legal authority over approving or carrying out the project. *State CEQA Guidelines* Section 15386 designates four agencies as trustee agencies: CDFW with regards to fish and wildlife, native plants designated as rare or endangered, game refuges, and ecological reserves; the State Lands Commission, with regard to state-owned "sovereign" lands, such as the beds of navigable waters and State school lands; the California Department of Parks and Recreation, with regard to units of the State park system; and, the University of California, with regard to sites within the Natural Land and Water Reserves System. The CDFW, due to the potential for rare or endangered species, is the only trustee agencies for the 2040 General Plan EIR.

1.5 Intended Uses of the EIR

This EIR is as an informational document for use in the Town's review and consideration of the proposed 2040 General Plan. This document is a Program EIR. CEQA Guidelines Section 15168(a) states that:

> A Program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical parts in a chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria, to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

As a programmatic document, this EIR presents and discloses a region-wide assessment of the environmental impacts of the 2040 General Plan. The information and analysis in this EIR will be used by the Windsor Planning Commission and Town Council, trustee agencies, and the general public.

The 2040 General Plan will guide subsequent actions taken by the Town in its review of new development projects and the establishment of new and/or revised Town-wide or area-specific programs. This program EIR serves as a first-tier environmental document under CEQA, supporting second-tier environmental documents for projects with detailed designs that have been developed for implementation within the Town. Analysis of site-specific impacts of individual projects is not the intended use of a Program EIR. Many specific projects are not currently defined to the level that would allow for such an analysis at this time. Individual and specific environmental analysis of each project will be undertaken as necessary in the future by the Town prior to each project being considered for approval. Therefore, the Town, acting as the Lead Agency, would be able to prepare subsequent environmental documents that incorporate by reference the appropriate information from this Program EIR regarding secondary effects, cumulative impacts, broad alternatives, and other relevant factors. If the Town finds that implementation of a later activity would have no new effects and that no new mitigation measures would be required, that activity would require no additional CEQA review. Where subsequent environmental review is required, such review would focus on significant effects specific to the project, or its site that have not been considered in this Program EIR.

1.6 Environmental Review Process

The environmental impact review process required under CEQA is summarized below. The steps appear in sequential order.

1 **Notice of Preparation (NOP) Distributed.** Immediately after deciding that an EIR is required, the lead agency must file a NOP soliciting input on the EIR scope to "responsible," "trustee," and involved federal agencies; to the State Clearinghouse, if one or more state agencies is a responsible or trustee agency; and to parties previously requesting notice in writing. The NOP must be posted in the County Clerk's office for 30 days. A scoping meeting to solicit public input on the issues to be assessed in the EIR is not required, but may be conducted by the lead agency. The NOP public comment period for the 2040 General Plan EIR was from November 30, 2016 to January 16, 2017 and a scoping meeting was held on January 5th, 2017. Public comments were received in response to the NOP and scoping process.

2 **Draft EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) alternatives; g) mitigation measures; and h) irreversible changes.

3 **Public Notice and Review.** A lead agency must prepare a Public Notice of Availability of an EIR. The Notice must be placed in the County Clerk's office for 30 days (Public Resources Code Section 21092) and sent to anyone requesting it. Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must consult with and request comments on the Draft EIR from responsible and trustee agencies, and adjacent cities and counties. The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days, unless a shorter period is approved by the Clearinghouse (Public Resources Code 21091). Distribution of the Draft EIR may be required through the State Clearinghouse. This will be circulated for a 45-day public review and will be sent to the State Clearinghouse.

4 **Notice of Completion.** A lead agency must file a Notice of Completion with the State Clearinghouse as soon as it completes a Draft EIR.

5 **Final EIR.** A Final EIR must include: a) any revisions to the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.

6 **Certification of Final EIR.** The lead agency shall certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project.

7 **Lead Agency Project Decision.** A lead agency may: a) disapprove a project because of its significant environmental effects; b) require changes to a project to reduce or avoid significant environmental effects; or c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted.

8 **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence,

that: a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible. If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that set forth the specific social, economic or other reasons supporting the agency's decision.

9 **Mitigation Monitoring/Reporting Program.** When an agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.

10 **Notice of Determination.** An agency must file a Notice of Determination after deciding to approve a project for which an EIR is prepared. A local agency must file the Notice with the County Clerk. The Notice must be posted for 30 days and sent to anyone previously requesting notice. Posting of the Notice starts a 30-day statute of limitations on CEQA challenges.

2 Project Description

The project analyzed in this EIR is the proposed Town of Windsor 2040 General Plan. This section of the EIR describes the key characteristics of the 2040 General Plan, including the project proponent/lead agency, the geographic extent of the plan, project objectives, required approvals and types and extent of development forecasted under the 2040 General Plan.

2.1 2040 General Plan

The 2040 General Plan is a comprehensive update of the Town's 1996 General Plan, and establishes the community's vision for future development of the Town over the next 22 years. As part of the general plan process, the 2040 General Plan has been reorganized and reformatted, with updated goals and policies that reflect the community's vision of Windsor. The Town's General Plan Land Use Map has also been updated to reflect the community's vision and three themes that thread through the 2040 General Plan: growth management, sustainability and resiliency, and community health and well-being.

The growth and development in Windsor would be guided by the 2040 General Plan. The 2040 General Plan would maintain the Town's small size and surrounding rural atmosphere, while respecting natural resources. Growth within the Town limits is supported by the 2040 General Plan with consideration of the ability to provide public services, fiscal impacts, and infrastructure capacity including water and wastewater capacity and transportation. Infill development would be prioritized to create more efficient and cost effective infrastructure, maximizing underutilized parcels in the Town. Development under the 2040 General Plan would establish a more defined community edge providing a sense of transition between farmland on the Town's edge and development within the Town.

The 2040 General Plan includes the following seven updated Elements: Land Use and Community Design, Economic Development, Transportation and Mobility, Public Facilities and Services, Environmental Resources, Public Health and Safety, and Housing. These seven elements describe the existing conditions and context for the related topic areas, followed by goals, policies, and implementation programs to guide the Town's management and development through 2040.

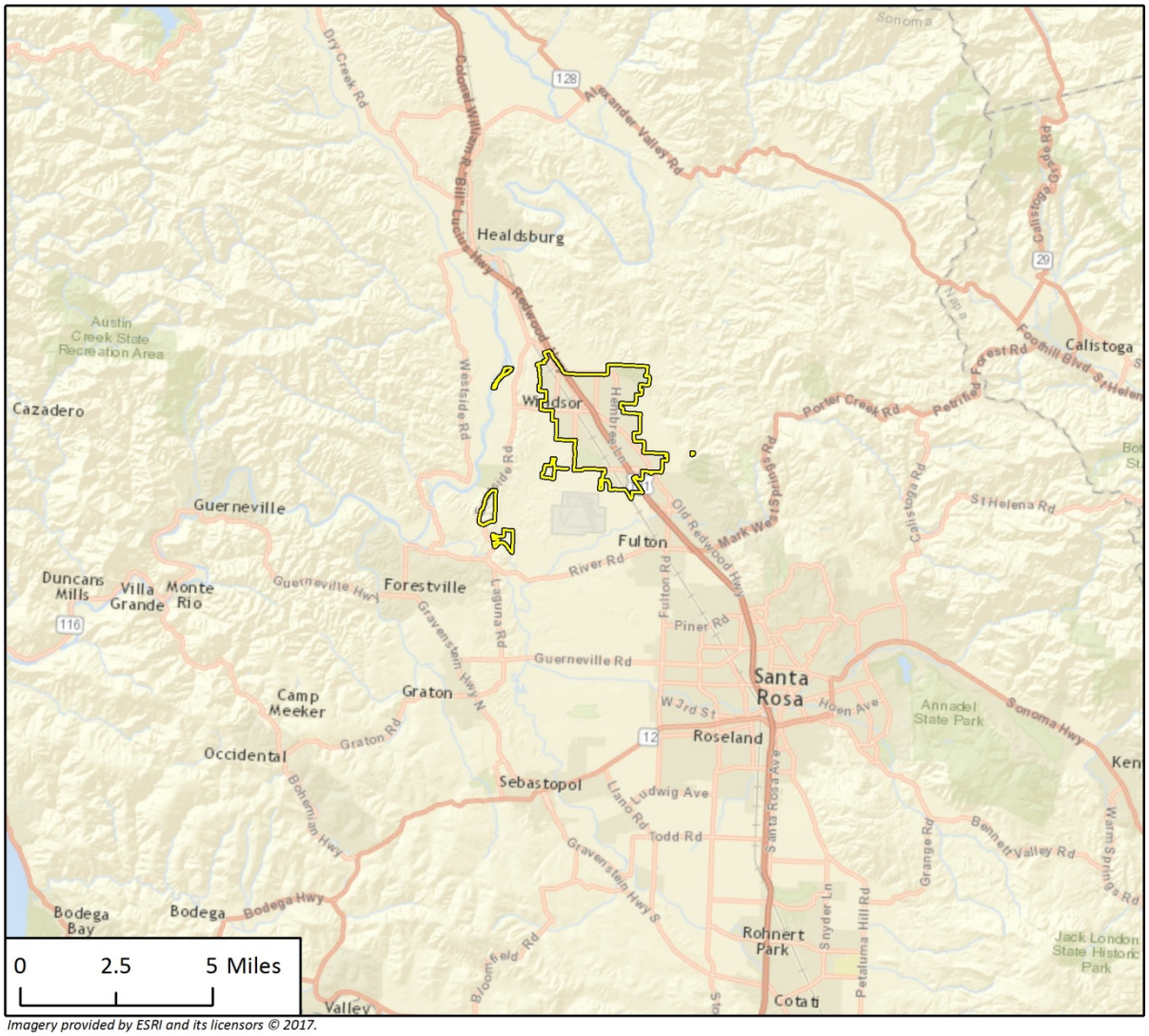
2.2 Project Proponent

The Town of Windsor is both the project proponent and the lead agency for the proposed 2040 General Plan. The Town's Planning Division, which is located at 9291 Old Redwood Highway, Windsor, California, 95492, prepared this EIR with the assistance of Rincon Consultants.

2.3 Project Location

Windsor is located in central Sonoma County, approximately 20 miles east of the Pacific Ocean. The City of Healdsburg is approximately five miles to the northwest and Santa Rosa, the Sonoma County seat, lies seven miles to the southeast. Figure 1 shows a regional map of the Town's relationship to nearby cities, communities, and the state highway system.

Figure 1 Regional Location



Town of Windsor Limits

N



EIRFig 2-1 Regional Location

Regional access is provided by U.S. Highway 101, a major north-south limited access freeway. Highway 101 bisects Windsor and connects California's northern coastal counties with the San Francisco Bay metropolitan area. The Town is also served by a surface street system ranging from multi-lane arterial roadways with medians to narrow two-lane streets. The street system as it exists today reflects recent changes that have occurred over the last decade as the Town has been transitioning from auto-centric policies to those that better support all modes and users. In 2014, bike lanes were installed on Old Redwood Highway at the Highway 101 Central Windsor Interchange. Rail travel provides additional access to Windsor and the Northwestern Pacific Railroad parallels Highway 101, approximately one-quarter mile west of Highway 101. The Sonoma-Marin Area Rail Transit (SMART) commuter rail system is a 70-mile rail line that runs from Cloverdale, at the north end of Sonoma County, to Larkspur in Marin County. Full buildout of SMART is anticipated in 2021 and it would have stations at major population areas including Windsor. The Sonoma County Airport is located one-quarter mile south of the Town.

With an estimated 2017 population of 27,371, Windsor is the fourth most populous of the county's nine cities after Santa Rosa, Rohnert Park, and Petaluma (DOF 2017). Since the Town's incorporation in 1992, Windsor experienced a high rate of growth, outpacing the rate of growth in both Sonoma County and the greater Bay Area. The Town has a relatively new housing stock where almost one-quarter of the housing units are less than 30 years old (Town of Windsor 2015a).

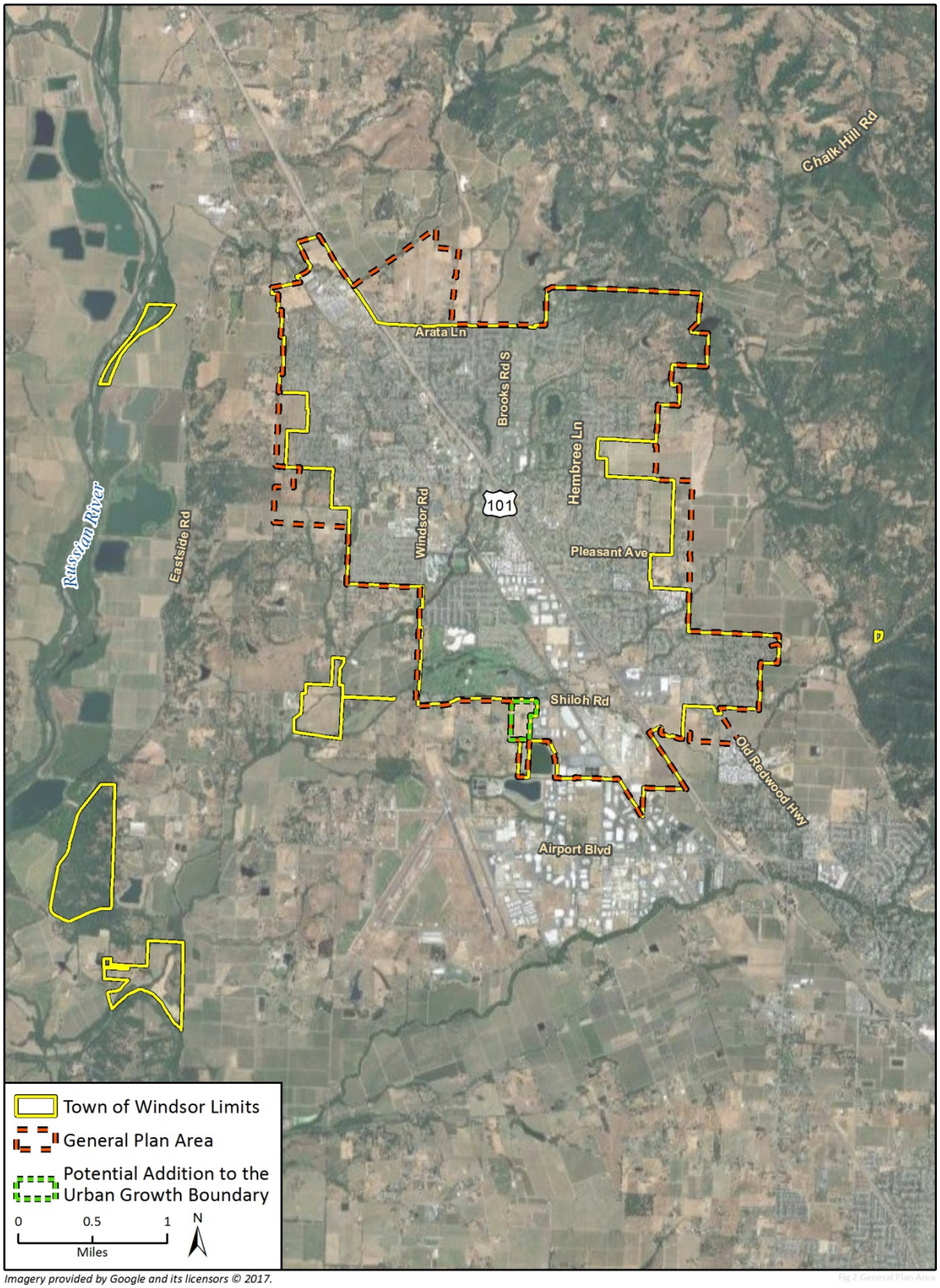
The Town of Windsor encompasses 7.3 square miles (4,672 acres). This includes four non-contiguous incorporated areas to the west of the main Town limits that contain water reclamation lands, well lands, and water facilities. Figure 1 shows the Town limits, including the four non-contiguous areas. Future growth and land use changes for the Town of Windsor are limited to the Urban Growth Boundary (UGB). The Windsor UGB currently encompasses 7.5 square miles and includes the incorporated areas of the Town as well as surrounding unincorporated areas that may be affected by the future growth of the Town. The Town is proposing that the UGB be renewed for 22 years to coincide with the horizon year of the General Plan, as well as expansion of the UGB to include an additional 22.5 acres. Areas outside the Town limits, but inside the proposed new UGB, include three parcels located immediately contiguous to the southwestern boundary of the Town, south of Shiloh Road and west of Skylane Boulevard. A ballot measure to expand the UGB will be placed on the November 2017 election ballot for voter approval.

This EIR uses the expanded UGB as the land use boundary for the 2040 General Plan as it represents the potential area where land use changes and/or physical changes to the environment may occur as a result of implementation of the General Plan. For the purposes of this EIR the area inside the expanded UGB is defined as the "General Plan Area" for the 2040 General Plan. Figure 2 illustrates the General Plan Area used for analysis within this EIR. The proposed General Plan goals, policies and implementation programs as well as proposed land use changes will not result in physical changes to areas outside of the General Plan Area.

Land Use and Regulatory Setting

The 2040 General Plan is a comprehensive update of the Town's 1996 General Plan, last revised in 2015. The current Windsor General Plan is made up of four Elements: Community Development, Housing, Environmental Resources, and Public Health and Safety. The current land use plan specifies 21 separate land use designations. These land use designations define the basic categories of land use allowed in the Town, and are implemented through the Town's Zoning Ordinance and Zoning Map, which contain more specific regulations and standards governing development on individual properties. Under State law, a property's zoning is

Figure 2 General Plan Area



required to be consistent with its General Plan land use designation (Government Code §65860). Section 65860(c) of the Government Code requires that when a General Plan is amended in a way that makes the Zoning Ordinance inconsistent with the General Plan, "the zoning ordinance shall be amended within a reasonable time so that it is consistent with the general plan as amended" but it does not define a specific time period that would constitute a reasonable time.

The 2040 General Plan is made up of seven Elements: Land Use and Community Design; Economic Development; Public Facilities and Services; Transportation and Mobility; Environmental Resources; Public Health and Safety and Housing. The Land Use and Community Design Element describes the general distribution, location, and extent of various land uses. Eighteen separate land use designations have been established in the 2040 General Plan to provide a mixture of land uses for the Town. Figure 3 shows the existing land use designations from the 1996 General Plan. Figure 4 shows the proposed new land use map under the 2040 General Plan, including the area proposed for addition to the Town's UGB. If the 2040 General Plan is adopted, the Town will subsequently need to review the rest of its Zoning Ordinance, including its Zoning Map, to make sure it is consistent with the new General Plan.

2.4 Project Objectives

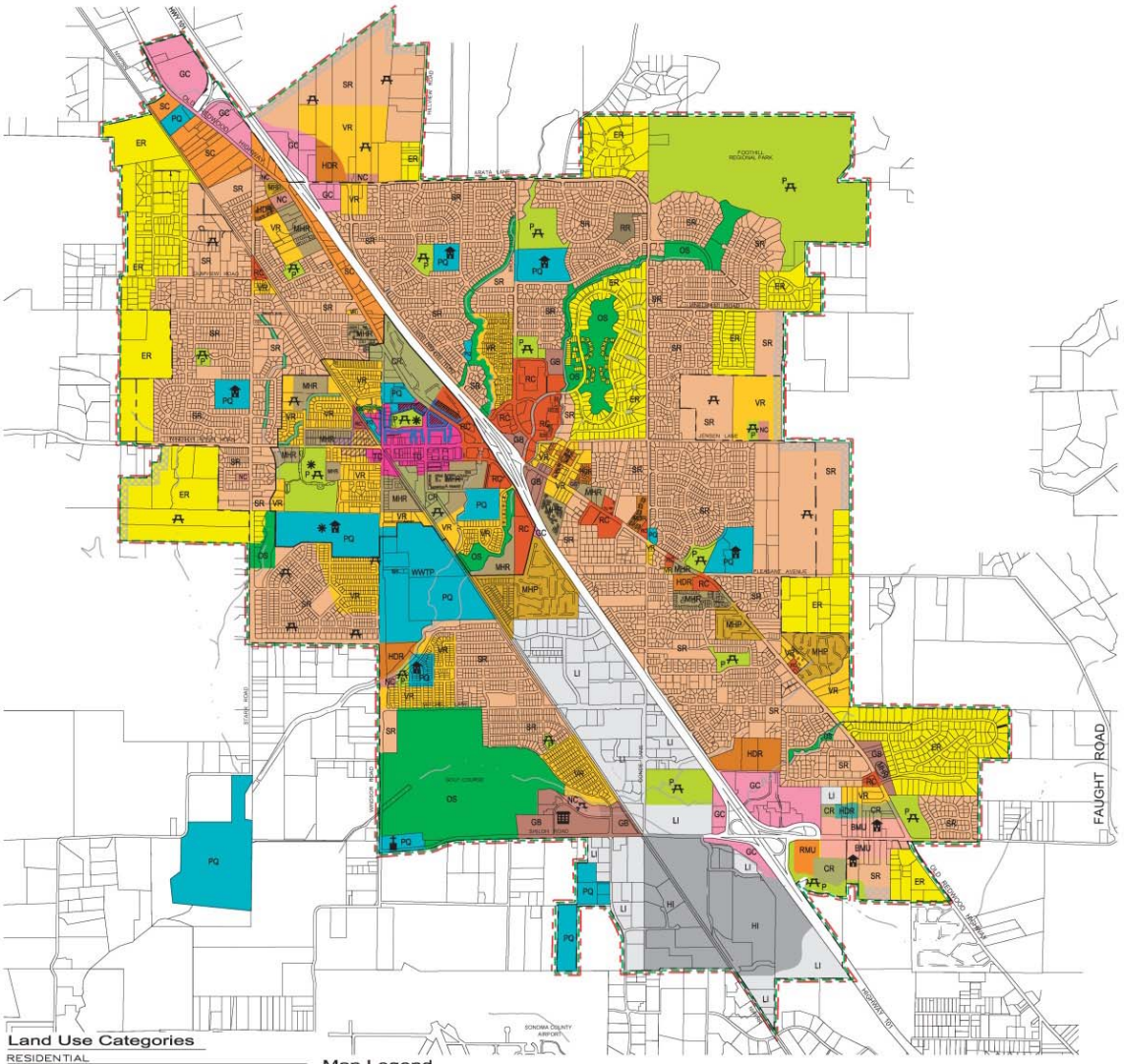
The 2040 General Plan vision for the future is as follows:

> Windsor is a family-oriented small town in the heart of Sonoma county wine country and near the Russian River recreation area that:
>
> - Provides a safe and walkable environment for residents and visitors;
> - Fosters diversity, collaboration, and civic engagement;
> - Promotes healthy and active lifestyles for all ages;
> - Demonstrates leadership and innovation in sustainable practices, development, and public infrastructure;
> - Supports a vibrant local and regional economy;
> - Values mobility and accessibility via walking, biking, and high quality public transit.

The 2040 General Plan sets the guiding principles for the Town. The guiding principles are contained on pages five through eight of the 2040 General Plan Introduction and abbreviated below:

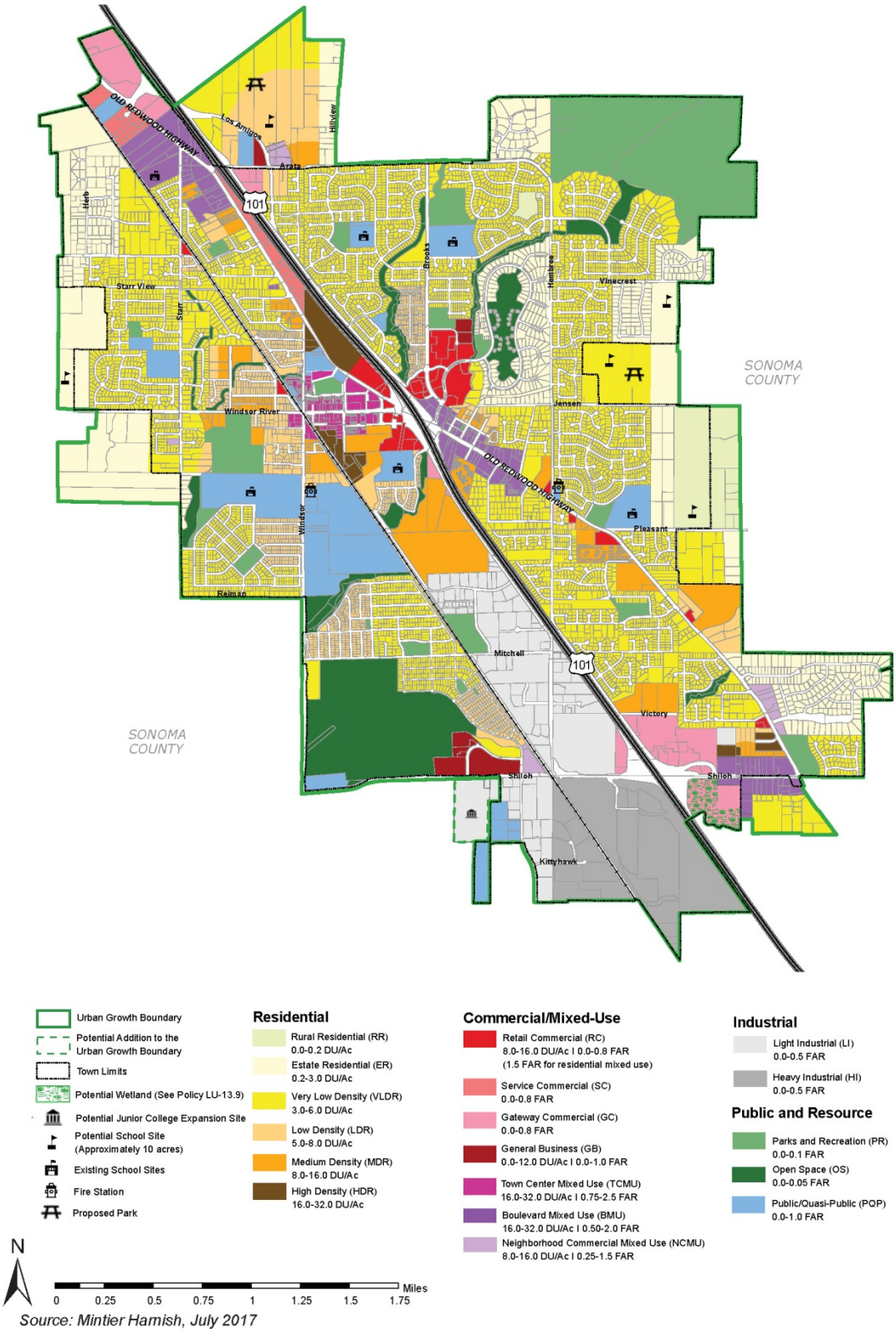
- **Town Identity**: family-oriented small town with excellent resources
- **Town Green and Downtown**: a focal point for the community, public gathering space, and center of the Town
- **Economic Vitality and Balance:** destination for visitors and tourists and a mix of land uses to support a variety of development
- **Community and Neighborhood Design:** "Smart Growth Development," visual interest, multiple options for mobility, and attractive open space
- **Natural Resources and Agriculture:** surrounding agricultural land defines the rural character, trails and parks, and agricultural farming in harmony with urban uses
- **Sustainability and Resilience**: stewardship of natural resources, energy efficiency, and sufficient resources

Figure 3 1996 General Plan Land Use Map



Source: Coastland Civil Engineering, Inc.

Figure 4 Project Site and General Plan Proposed Land Use Map



Source: Mintier Harnish, July 2017

2.5 Characteristics of the Proposed 2040 General Plan

The 2040 General Plan provides a blueprint for the Town over the next 22 years guiding future growth and development. The seven updated Elements included in the 2040 General Plan are further described below.

2.5.1 Land Use and Community Design Element

This element addresses a broad range of topics related to the physical structures and appearance of the Town's built environment providing goals for different areas and land use types within the Town. The Land Use and Community Design Element establishes the image of the Town and serves as the primary vehicle for ensuring that new land uses are logically organized and developed sustainably while enhancing Windsor's unique identity. The Element seeks to preserve the natural resources within the Town, encourage and support rural and agricultural uses outside the Urban Growth Boundary, and establish a well-defined community edge. New development at the Town's edge would provide a sense of transition between active farmland at the Town's edge and development within the Town. Finally, the element would prioritize infill development over development at the fringe, maximizing the use of underutilized parcels within the Town and minimizing the loss of open space. Specific land use designations in the Land Use and Community Design Element are show in Table 2.

Table 2 Description of Land Use Designations

Land Use Designation	Description	Density/ Intensity Range
Residential		
Rural Residential (RR)	This land use designation provides areas for a rural residential living environment. Typically, these areas do not have urban services (such as public water supply, sewer, and storm drains). Allowable land uses may include single-family detached residential uses, limited agricultural operations, and recreation activities. Given the inefficient use of land and infrastructure, application of this development pattern will be limited.	Minimum Density: N/A Maximum Density: 0.2 du/acre
Estate Residential (ER)	This land use designation provides for a large-lot single family neighborhood environment. Estate residential areas allow for single-family detached residential uses and contribute to variety and choice in housing and lifestyle.	Minimum Density: 0.2 du/acre Maximum Density: 3.0 du/acre
Very Low Density Residential (VLDR)	This designation provides for a mix of housing types on traditional single-family lots. This is the predominant residential land use pattern in the Town and is intended to characterize much of the new housing as well. New development under this classification is encouraged to accommodate a range of housing types to provide greater choices for Windsor residents. Single-family homes, duplexes, and triplexes are compatible with this classification. Other attached unit types may be considered subject to design review to ensure compatibility with single-family detached development.	Minimum Density: 3.0 du/acre Maximum Density: 6.0 du/acre
Low Density Residential	This designation provides for a mix of housing types on smaller lots or as attached units. Single family homes, duplexes, triplexes, and townhomes are allowable within this classification.	Minimum Density: 5.0 du/acre Maximum Density: 8.0 du/acre

Land Use Designation	Description	Density/ Intensity Range
Medium Density Residential (MDR)	This designation provides for a medium density residential living environment marked by attached units. Allowable uses include small-lot single-family units, row houses, townhomes, small apartment complexes, and mobile home parks.	Minimum Density: 8.0 du/acre Maximum Density: 16.0 du/acre
High Density Residential	This designation provides for compact, high-density multifamily housing in areas served by major transportation routes and facilities, and near major shopping areas.	Minimum Density: 16.0 du/acre Maximum Density: 32.0 du/acre
Commercial/Mixed-Use		
Town Center Mixed-Use (TCMU)	This designation accommodates an intensive mix of retail, residential, office, hotel, and entertainment uses in the Town Center. This designation is intended to distinguish the Downtown as a unique and vibrant place where the community can gather to socialize shop, play, and live. Residential uses are allowed on the second floor or higher in a vertically mixed configuration, but are not required to be included in a development.	Minimum Density: 16.0 du/acre Maximum Density: 32.0 du/acre Minimum FAR: 0.75 Maximum FAR: 2.5
Boulevard Mixed-Use (BMU)	This designation provides for mixed-use development that can include retail, residential, office, hotel, or entertainment uses with extensive pedestrian-oriented frontage on a boulevard street. The intention of this designation is to create active places where people live, work, socialize, and shop by intermixing housing with commercial and/or office uses. Uses can occur within the same building (vertical mixed-use) or on the same site (horizontal mixed-use); however, mixed-use development along the street-frontage shall be vertical mixed-use. Exceptions may be granted pursuant to Policy LU-4.5. The Boulevard Mixed-Use designation is generally applied at nodes along Crosstown Boulevard streets, including to Old Redwood Highway and Shiloh Road east of Highway 101.	Minimum Density: 16.0 du/acre Maximum Density: 32.0 du/acre Minimum FAR: 0.5 Maximum FAR: 2.00
Neighborhood Center Mixed-use (NCMU)	The intention of the Neighborhood Center Mixed-Use designation is to create small-scale neighborhood centers where area residents can gather to socialize, shop, or recreate. Neighborhood Center Mixed-Use allows for diverse uses, including commerce, professional office, employment, entertainment, services, and culture located within the same building (vertical mixed-use) or on the same site (horizontal mixed-use). The intensity of development in the Neighborhood Center Mixed-Use is lower than that in the other mixed-use designation to maintain compatibility with adjacent lower-density single-family neighborhoods. Areas located along Old Redwood Highway that are designated NCMU are subject to the requirements of Policy LU-12.9.	Minimum Density: 8.0 du/acre Maximum Density: 16.0 du/acre Minimum FAR: 0.25 Maximum FAR:1.5
Retail Commercial (RC)	This designation emphasizes those uses that provide convenience goods and services for surrounding residential neighborhoods, the larger community, or subregion/region. Uses should be appropriate to the type of market being served. Centers serving community-wide or regional needs include uses which may either be neighborhood-oriented activities grouped together on a larger scale or uses that demand a larger market area. Uses include individual shops on single parcels, as well as freestanding shopping centers offering a range of local-serving or community-serving personal, retail and service activities,	Minimum Density: 8.0 du/acre Maximum Density: 16.0 du/acre Minimum FAR: N/A Maximum FAR: 0.8, or 1.5 when residential mixed-use is proposed

Land Use Designation	Description	Density/ Intensity Range
	restaurants, offices, and business services. The designation also allows for residential uses on the second floor as part of a mixed-use development. The retail commercial designation is generally located along major arterials and transit routes. Retail commercial centers should be located and designed to minimize impacts on surrounding residential areas.	
Service Commercial (SC)	This land use designation provides locations for personal, business, and travel services that are often land intensive (as opposed to labor intensive). Examples of uses allowable within this classification include landscape contractors, retail outlets for building/ construction materials, construction equipment sales and rentals, automobile repair and wrecking operations. Other uses compatible with this classification include office uses as well as travel-oriented land uses such as gasoline stations, transient lodging, and outdoor recreation/ amusement parks.	Minimum FAR: N/A Maximum FAR: 0.8
Gateway Commercial (GC)	The Gateway Commercial designation is applied in areas at key gateway points throughout town where special consideration in the design and appearance of new public and private improvements is warranted. This designation provides areas for commercial activities oriented to serve the traveling public near freeway interchanges and major arterials in such a fashion as to provide safe and convenient access. Compatible uses include tourist-serving uses, transient lodging, conference/ recreation facilities, gasoline stations, and restaurants. Regional-serving retail uses may also be considered in this designation. Gateway Commercial areas located at the edge of Windsor must be designed to create an attractive and aesthetically pleasing entry into town, consistent with Policy LU-3.5.	Minimum FAR: N/A Maximum FAR: 0.8
General Business (GB)	This land use designation provides for a broad range of uses, including office, retail, and service activities, with a focus on professional office.	Minimum FAR: N/A Maximum FAR: 1.0
Industrial		
Light Industrial (LI)	This designation provides for manufacturing, warehousing, assembly uses, research and development, and flex industrial space with limited or very low nuisance characteristics. The designation is applied to areas where nuisance characteristics of noise, odor, traffic generation, unsightliness, or hazardous materials manufacturing or storage are undesirable. Light Industrial areas typically include industrial park developments with high quality landscaping and screening. This designation allows for office, retail, and other service uses that serve the employees in the area. Uses that are ancillary to the primary use of a property, such as product display and/or sampling areas, facility tours, and promotional events, are also permissible.	Minimum FAR: N/A Maximum FAR: 0.6
Heavy Industrial (HI)	This designation provides for a broad range of heavier industrial, manufacturing, and warehousing uses. These areas typically include land-intensive manufacturing activities that may generate objectionable noise, smoke, odor, dust, noxious gases, glare, heat, fire hazards, vibration, and industrial wastes. Heavy Industrial area uses are assumed to have moderate nuisance characteristics, but to discourage hazardous materials manufacturing or distribution. This designation should not be located adjacent to a residential neighborhood or center	Minimum FAR: N/A Maximum FAR: 0.5

Land Use Designation	Description	Density/ Intensity Range
	without substantial buffers (light industrial, parks, greenways, or open space).	
Public and Resource		
Public/Quasi-Public (PQP)	This designation is applied to the Town's major public buildings and facilities owned by the Town, Sonoma County, State, Federal, other public agencies that serve the general public, or private institutional uses. This classification includes public schools, libraries, government, police, and fire facilities; corporation yards; private utilities; the wastewater treatment plant; and cemeteries.	Minimum FAR: N/A Maximum FAR: 1.0
Parks and Recreation (PR)	The Parks and Recreation designation includes greenways, large developed parks, and other areas primarily used for recreation (smaller parks and recreation facilities may be included as elements within other urban form types). Typically, these areas are characterized by a high degree of open area, and a limited number of buildings.	Minimum FAR: N/A Maximum FAR: 0.10
Open Space (OS)	This land use designation promotes the conservation of resource values, to protect public safety from hazardous conditions (such as floodways and active landslide areas), to provide visual relief from urbanization, to diminish land use incompatibilities between agricultural and urban development, and to allow development of outdoor recreation.	Minimum FAR: N/A Maximum FAR: 0.05

Source: Town of Windsor 2040 General Plan

2.5.2 Economic Development Element

Windsor is located in the heart of a unique agricultural crossroads with wine, organic agriculture, and artisan food providing the Town with the opportunity to fulfill untapped economic potential. The Economic Development Element seeks to preserve and enhance this heritage by supporting and expanding the wine/craft beverage industry, agricultural industry, and related tourism. In addition, the Element also builds off of Windsor's commitment to sustainability and can pave the way for attracting green industry and create a unique identifier for the community. The element also seeks to capture a greater share of local spending by encouraging new retail establishments that provide needed goods and services to local residents and businesses. The Economic Development Element provides guidance on how Windsor can build upon its successes by fostering a business-friendly environment, encouraging additional local employment opportunities, cultivating diversification, and expanding the tourism industry.

2.5.3 Transportation and Mobility Element

The Transportation and Mobility Element provides the framework for decisions in Windsor concerning the transportation system. In Windsor, one of the greatest transportation challenges is the bisecting of the Town by Highway 101, creating inefficiencies in the circulation network and a barrier between the two sides of Town. This Element provides opportunities to make highway-related improvements that would improve circulation and connectivity. The goals and policies in this Element address a balanced transportation network that would support and encourage walking, bicycling, and transit ridership; conserve energy resources; and reduce greenhouse gas emissions, while continuing to accommodate automobile travel.

2.5.4 Public Facilities and Services Element

The Public Facilities and Services Element guides the overall provision of community facilities and services in Windsor. The Town is committed to providing safe, reliable, and efficient services and utilities to all residents and businesses. As described in this Element, the Town will continue to maintain adequate administrative service facilities to ensure a safe community while building on successful partnerships with businesses and residents. The Element also includes further enhancement of the parks and recreation system, accessibility to social services, and education at Windsor's schools.

2.5.5 Environmental Resources Element

The Environmental Resources Element addresses the preservation and protection of environmental and cultural resources. It also expresses the Town's greenhouse gas emissions reduction goals and outlines policies that will guide the Towns efforts to reduce greenhouse gas emissions and curtail the impacts of climate change. The Environmental Resources Element contains additional policies related to energy efficiency.

2.5.6 Public Health and Safety Element

The Public Health and Safety Element establishes goals, policies, and programs that address the potential for disasters that may affect Windsor such as earthquakes and floods. The Element provides guidance on minimizing the impact of hazards on the community. The Town of Windsor has prepared a Local Hazard Mitigation Plan (LHMP). The LHMP identifies mitigation measures to reduce the risks posed by potential hazards and to strengthen community resilience. The Town's Public Health and Safety Element is integrated with its Local Hazard Mitigation Plan, ensuring a coordinated approach to public safety and qualifying the Town for additional funding opportunities (consistent with California Government Code Section 65302.6).

2.5.7 Housing Element

The Town adopted the 2015-2023 Housing Element in January 2015 as part of the State's fifth Housing Element planning cycle. The 2040 General Plan Update incorporates the adopted 2015 Housing Element. No substantive changes are being proposed to the Housing Element as part of its incorporation into the 2040 General Plan Update. However, the Housing Element sites inventory has been updated to ensure consistency with the 2040 General Plan Land Use Diagram changes. The update maintains a surplus of residentially zoned land at appropriate densities to meet the Regional Housing Needs Assessment (RHNA).

2.5.8 General Plan Administration and Implementation

In addition to the elements the 2040 General Plan required by State law, the third section of the General Plan is Administration and Implementation. This section outlines the process of administering and updating the 2040 General Plan and a program for monitoring its implementation. The section also outlines requirements for implementing the Town's General Plan consistent with goals, policies, and programs, and provides an overview of the types of actions and tools the Town would use to implement the 2040 General Plan policies. Each General Plan Element has a list of specific implementation programs that are contained in this section.

2.6 General Plan Buildout

The Town of Windsor contains approximately 855 developable acres in a variety of land uses. The 2040 General Plan designates land uses defining the type of development that can occur throughout the Town through the planning horizon year of 2040 (over approximately 22 years). The potential growth associated with the 2040 General Plan is based on development assumptions/projections for residential and non-residential development for all land within the General Plan Area through the year 2040. The development assumptions do not assume buildout at maximum allowable intensities. Rather, development is projected to occur at certain intensities based on actual development intensities that have occurred within the various land use designations in the Town. For residential uses, use of a reasoned density assumption rather than a maximum density assumption is in alignment with California Department of Housing and Community Development (HCD) directives to use realistic capacity estimates when quantifying site densities. For non-residential uses, the increase in FAR associated with the 2040 General Plan creates greater flexibility in use of non-residentially designated lands. If potential buildout was assumed at maximum development intensities, the buildout would be speculative and potentially result in unrealistic impacts and unnecessary and costly improvements. Accordingly, the adjusted development assumptions used in this analysis reflect a reasonable and more accurate estimate of non-residential growth based on actual FARs and employment projections using market projections prepared by Applied Development Economics (ADE) which were completed as part of the General Plan Update. For both residential and non-residential, the assumptions are applied to the entire inventory of land within the General Plan Area. They do not presume that only certain areas within the General Plan Area will develop during the horizon year.

As shown in Table 3 and Table 4, based on the buildout capacity of approximately 855 developable acres, under full buildout of the 2040 General Plan an estimated 11,067 new residents and 3,910 new dwelling units would be added to Windsor. The residential growth is anticipated to result in up to 2,241 new single family residences and 1,669 new multi-family housing units. This is roughly equivalent to an average annual growth rate of one percent from 2017 to 2040.

Table 3 Projected Dwelling Units

2017 Existing Dwelling Units (DOF)	Estimated Net New Dwelling Units (2015-2040)	Estimated 2040 Total Dwelling Units	Estimated Dwelling Units Per Year
9,660[a]	3,910[b]	13,544*	156

Sources:

[a] DOF, E-5 Population and Housing Estimates, for Cities, Counties, and the State, 2011-2017, with 2010 Census Benchmark

[b] Town of Windsor 2040 General Plan

*Estimated total dwelling units based on the net increase added to the 9,634 dwelling units in 2015

Table 4 Projected Population

2017 Estimated Population (DOF)	Estimated Net New Population (2015-2040)	Estimated 2040 Population
27,371[a]	11,067[b]	38,028*

Source:

[a] DOF, E-5 Population and Housing Estimates, for Cities, Counties, and the State, 2011-2017, with 2010 Census Benchmark

[b] Town of Windsor 2040 General Plan

*Estimated population based on increase of the net new population added to the 2015 population of 26,961

The increased land uses are anticipated to generate 2,860 new jobs in the Town by the year 2040 in the service, industrial, retail, and office divisions. This is roughly equivalent to 1.6 million square feet of non-residential uses. The full capacity of the vacant and underutilized non-residential land far exceeds this projected non-residential growth. The 2040 General Plan assumption for non-residential growth is based on market projections prepared by Applied Development Economics (ADE) for the General Plan Update. ADE projected a range of 1,790 to 2,300 net new jobs in Windsor by 2040. The General Plan assumes ADE's high-end projection of 2,300 jobs plus approximately 25 percent (thus an estimated 2,860 net new jobs in 2040). This assumption ensures that the General Plan analysis does not result in overstated impacts, but provides flexibility in the event the Town is able to attract additional employers or industries by 2040.

2.7 Required Discretionary Approvals

With recommendations from the Town's Planning Commission, the Windsor Town Council will need to take the following discretionary actions in conjunction with the proposed project:

- Certification of the Final EIR
- Approval of the proposed 2040 General Plan

Windsor adopted its current Housing Element in January 2015, covering the period 2015-2023. This Housing Element was submitted to the California Department of Housing and Community Development (HCD) for review and comment, and the Town received certification of the Housing Element from HCD in February 2015. As noted above in Section 2.6.7, the 2040 General Plan Update does not make any changes to the Housing Element policies; however, it does include an update to the Housing Element sites inventory to ensure consistency with the 2040 General Plan Land Use Diagram changes.

3 Environmental Setting

According to CEQA Guidelines Section 15125, an EIR must include a description of the existing physical environmental conditions in the vicinity of a project to provide the baseline condition against which project-related impacts are compared. In order to fulfill this requirement, and to inform the reader of the context in which the 2040 General Plan would be carried out, this section describes current environmental conditions in and around Windsor. More detailed setting information is included within the impact analysis for each issue area.

3.1 Regional Setting

Windsor is located in central Sonoma County in the San Francisco Bay Area, approximately 20 miles east of the Pacific Ocean. The General Plan Area is roughly bounded by the Russian River to the west, the Coastal Range ridgeline to the north (at the intersection of Old Redwood Highway with the Northwestern Pacific Railroad), the Mayacamas mountain range to the east and the Charles M. Schulz Sonoma County Airport to the south. The majority of the area exhibits a relatively flat to rolling terrain, bordered by hills to the east, north, and west. Surface drainage through the area is towards the southwest; streams drain from the higher hills to the east and flow into Mark West Creek and the Russian River. Elevations within the General Plan Area range from about 100 to 500 feet above sea level. The Mediterranean climate of the region and coastal influence produce moderate temperatures year round, with rainfall concentrated in the winter months. The region is subject to various natural hazards, including: earthquakes, landslides, dam failure, drought, extreme heat, fault rupture, flood, liquefaction, and wildfires.

3.2 Physical Setting

3.2.1 General Geographic Setting

Windsor is a suburban Town framed by undeveloped hills that comprise foothills of the Coast Range. The Town is located approximately five miles southeast of the City of Healdsburg and the City of Santa Rosa, the Sonoma County seat, lies seven miles to the southeast. Windsor is located in the northern end of the Santa Rosa Plain, between two ridges of the Coast Range mountains. The plain extends north and east to the foothills and is relatively level. The foothills to the east gently slope to a peak approximately 700 feet above sea level. The northern ridgeline rises approximately 600 feet above the plain and represents a visually prominent landform that defines the northern General Plan Area. Because of Windsor's relatively level terrain, the hills and ridges to the east, west, and north form a scenic backdrop for the Town.

Highway 101 bisects the Town from north to south providing regional access to the Town and connecting the Town to California's northern coastal counties and the San Francisco Bay metropolitan area. The Northwestern Pacific Railroad parallels Highway 101 and is approximately one-quarter mile west of Highway 101. The rail line connects to the City of Cloverdale to the north and the City of Larkspur to the south. Figure 1 in Section 2, *Project Description*, shows the Town's regional location. The Sonoma-Marin Area Rail Transit (SMART) train is a passenger rail service

project that will connect Sonoma and Marin Counties with full service anticipated by 2021. In 2007, Windsor opened a new intermodal transit station downtown where boarding platforms will be constructed to add SMART commuter rail service to the Town, connecting it to other nearby cities (SMART Final EIR 2006).

Windsor is a residential community where most of the development is single-family one- and two-story buildings. Single family residential uses make up 31 percent of the Town Limits (1,399 acres). Commercial and office area make up roughly four percent of the Town Limits (179 acres). Agricultural uses only make up 1.6 percent of the Town Limits (Town of Windsor 2015a).

3.2.2 Topography and Drainage

The Town of Windsor lies within the Russian River Watershed, the largest watershed in the County. Windsor is primarily within the Mark West Creek sub-watershed where the primary stream is Mark West Creek. A network of creeks and tributaries within the sub-watershed run through the Town and drain the Windsor plain in a southwest and westerly direction (Town of Windsor 2015a).

Windsor is located in the northern end of the watershed, in the Santa Rosa Plain. It lies between two ridges of the Coast Ranges. The plain extends north and east to the foothills and is relatively level and cultivated with vineyards. The foothills to the east gently slope to a peak approximately 700 feet above sea level. The northern ridgeline rises approximately 600 feet above the plain floor. The Town of Windsor sits on the valley floor, approximately 50 feet above the Russian River floodplain.

3.2.3 Climate

The climate of Windsor is of the semi-arid Mediterranean type, characterized by dry, mild summers and moderately moist, cool winters. Over 90 percent of the rainfall occurs between October and May. Average summer temperatures are in low 80s (degrees Fahrenheit) with highs in the upper 80s. Average temperatures in the winter are in the 50s. Temperature variations between night and day tend to be relatively large during summer with a difference of up to 35 degrees and limited during winter with an average difference of 19 degrees. Precipitation generally occurs between October and May and the average rainfall is approximately 40 inches per year.

3.3 Demographics

Since its incorporation in 1992, Windsor has expanded rapidly, outpacing growth in both Sonoma County and the Bay Area. The Town's population increased by 20.3 percent between 2000 and 2017 at an average annual growth rate of just under one percent (DOF 2017). The average household size has remained comparatively high in Windsor, with an average household size of 3.02 persons per household in 2017 (DOF 2017). Windsor has a high proportion of families, which represented approximately three-quarters of households in the Town in 2010. However, the population of Windsor is aging as the middle aged population has significantly increased since 2000, while the young adult population has decreased (Town of Windsor 2015a).

According to the California Department of Finance, the Town had 9,660 housing units (9,045 of which were occupied) as of May 1, 2017, including 8,167 single-family dwelling units (84.5 percent), 859 units within multi-family buildings (8.9 percent), and 634 mobile homes (6.6 percent).

3.4 Cumulative Development

CEQA defines cumulative impacts as two or more individual actions that, when considered together, are considerable or will compound other environmental impacts. Cumulative impacts are the changes in the environment that result from the incremental impact of development of the proposed project and other nearby projects. For example, traffic impacts of two nearby projects may be insignificant when analyzed separately, but could have a significant impact when analyzed together. Cumulative impact analysis allows an EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

Because the proposed project is comprised of a General Plan, cumulative impacts are treated somewhat differently than would be the case for a project-specific development. CEQA Guidelines Section 15130 provides the following direction relative to cumulative impact analysis:

> Impacts should be based on a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact.

By its nature, a general plan considers cumulative impacts insofar as it considers cumulative development that could occur within the General Plan Area. Therefore, the analysis of project impacts also constitutes the cumulative analysis. In addition to cumulative development within the General Plan Area, the analysis of traffic and related impacts (such as noise) considers the effects of regional traffic growth occurring outside of the General Plan Area.

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4 Environmental Impact Analysis

This section discusses the possible environmental effects of the 2040 General Plan for the specific issue areas that were identified by the Town, expert consultation, and NOP responses as having the potential to experience significant impacts. Significant effect is defined by CEQA Guidelines §15382 as:

> …a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment, but may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the significance thresholds, which are those criteria adopted by the Town and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

Significant and Unavoidable. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.

Significant but Mitigatable. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.

Less than Significant. An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.

Beneficial. An effect that would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with other planned and pending developments in the area listed in Section 3, *Environmental Setting*.

Because the proposed project is comprised of a General Plan, cumulative impacts are treated somewhat differently than would be the case for a project-specific development. CEQA Guidelines Section 15130 provides the following direction relative to cumulative impact analysis:

> Impacts should be based on a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact…

By its nature, a general plan considers cumulative impacts insofar as it considers cumulative development that could occur within a city's plan area. Therefore, the analysis of project impacts also constitutes the cumulative analysis. In addition to cumulative development within the General Plan Area, the analysis of traffic and related impacts (such as noise) considers the effects of regional traffic growth occurring outside the General Plan Area.

4.1 Aesthetics

This section evaluates the proposed General Plan's potential impacts to aesthetics, including scenic vistas, scenic resources, visual character and quality, and light and glare.

4.1.1 Setting

Definitions

Most communities identify scenic resources as important assets that form community identity. Although the perception of what is considered "scenic" may vary according to the environmental setting, the Town of Windsor Zoning Ordinance defines scenic resources as inclusive of "entry statements to the Town, scenic corridors along major highways/streets, and/or specific rural, natural or historic areas" (Windsor 2014). Scenic resources also typically include natural open spaces, unique topographic formations, natural landscapes, and aspects of the built environment such as parks, trails, cultural resources, and architecturally significant buildings.

Viewsheds also contribute to aesthetic value, as they establish the context in which scenic resources may be observed. They are typically defined by physical features that frame one or more scenic resources. For example, an area's topography can contribute to aesthetic value through the creation of view corridors and/or scenic vistas consisting of ridgelines and mountains, which can form a community's visual backdrop. Viewsheds can also include a range of resources (including natural and/or man-made elements) and thus natural and man-made environments can be considered important scenic resources worthy of preservation.

Existing Visual Conditions

The Town of Windsor is located in the Santa Rosa Plain, between the Mayacamas mountain range to the east and the Coastal Range ridgeline to the north (Windsor 2015a). The Santa Rosa Plain extends north and east to the foothills and is relatively level and cultivated with vineyards. The foothills to the east gently slope to a peak approximately 700 feet in elevation. The northern ridgeline rises approximately 60 feet above the plain floor and represents a visually prominent landform. Windsor sits on the plain floor, approximately 50 feet above the Russian River floodplain to the west. Because of Windsor's relatively level terrain, the hills and ridges to the east, west, and north form a scenic backdrop for the town. These distant views provide a sense of enclosure and place for the community.

Much of Windsor's identity and natural beauty is linked to the rural character and open spaces of the surrounding area (Windsor 2015a). The scenic resources that contribute to Windsor's setting include surrounding foothills; open space areas such as agricultural lands, creeks, and woodlands; and oak trees, which are the most distinctive vegetation in Windsor. This natural setting, combined with Windsor's relatively compact development pattern, imparts a small town, rural atmosphere that is experienced from a number of public vantage points throughout the town, including local parks, particular roadway segments, and along stretches of Highway 101.

The Town is a primarily a single-family residential community, supported by limited retail and office uses. Within the existing Urban Growth Boundary, single-family residential development accounts for 29.2 percent of land. This land use is clustered to the east of Highway 101 and in the west-central and northwest parts of Windsor (Windsor 2015a). Many older homes were originally rural

residences, with architecture varying from raised, wood slat homes with front porches to concrete and plaster homes with aluminum windows and asphalt driveways. Recent residential development is visually distinct from the older residential areas and is characterized by tract subdivisions that are generally enclosed by walls. Most of these subdivisions are announced with signs, emblems, or landscaped monuments at the primary entrance. The subdivisions may vary in design, color scheme, size of structure and type of materials, but they are typically single-family detached homes, one to two stories in height.

The major commercial developments in Windsor are located in four areas: the Downtown area; the Lakewood Shopping Center area, the Shiloh Shopping Center area, and the Old Redwood Highway corridor (Windsor 2015a). The Old Town area is located along Windsor River Road, immediately west of Highway 101. "Old Town" provides a view of the community's past with a few historical residences of the late 1800s intermixed with commercial buildings.

Scenic Corridors

Scenic corridors provide an opportunity for the public to take advantage of the natural environment's aesthetic value. Scenic corridors typically pertain to roadways and visible lands outside the roadway right-of-way. California's Scenic Highway Program designates scenic highways with the intention of protecting their corridors from change that would diminish the aesthetic value of adjacent lands. There are no State-designated scenic highways within the Town of Windsor (Caltrans 2017). The nearest eligible scenic highway to General Plan Area is State Route 12, located approximately seven miles to the southeast in Santa Rosa.

The 2015 General Plan recognizes all or portions of 15 roadways as scenic corridors that "enhance the visual experience for Town residents and non-residents" (Windsor 1996). Table 5 describes these scenic corridors.

Table 5 Town-Designated Scenic Corridors

Roadway	Extent of Scenic Corridor
Highway 101	Throughout Planning Area
Eastside Road	Throughout Planning Area
Pleasant Avenue	Emmerson Street to Chalk Hill Road
Windsor River Road	Eastside Road to Kensington Lane
Starr Road	Town limits to Amber Ridge Way
Reiman Lane	Starr Road to Windsor Road
Windsor Road	Reiman Lane to west of Saunders Road
Shiloh Road	Windsor Road to Day Road
Conde Lane	Mitchell Lane to Shiloh Road
Mitchell Lane	Railroad tracks to Conde Lane
Arata Lane	Hillview Road to Hembree Lane
Brooks Road South	Arata Lane to Windsor Middle School
Jensen Lane	North-south segment south of Vinecrest Road
Diamantini Lane	Entire roadway
Chalk Hill Road	North of Wright Creek to south of Shiloh Road

Source: Windsor 1996.

Light and Glare

Existing development and motor vehicles in Windsor produce light and glare. Primary sources of light are streetlights, parking lot lighting, and automotive headlights. Glare refers to the discomfort or impairment of vision experienced when a person is exposed to a direct or reflected view of a light source, causing objectionable brightness that is greater than that to which the eyes are adapted (Pennsylvania Outdoor Lighting Council n.d.). General sources of glare include reflected sunlight from the windows of buildings, from automobiles, and from glass building facades.

Regulatory Setting

Federal

No existing federal regulations pertain to the visual resources within the General Plan Area.

State

The California Department of Transportation (Caltrans) defines a scenic highway as any freeway, highway, road, or other public right-of-way, that traverses an area of exceptional scenic quality. Suitability for designation as a State scenic highway is based on vividness, intactness, and unity, as described in Caltrans Guidelines for Official Designation of Scenic Highways (1995):

- Vividness is the extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements. A vivid landscape makes an immediate and lasting impression on the viewer.
- Intactness is the integrity of visual order in the landscape and the extent to which the natural landscape is free from visual intrusions (e.g., buildings, structures, equipment, grading).
- Unity is the extent to which development is sensitive to and visually harmonious with the natural landscape.

As discussed above, no officially designated or eligible scenic highways occur within seven miles of the contiguous Town of Windsor (Caltrans 2017).

Local

The Town's existing General Plan and Municipal Code provide the framework for evaluating potential aesthetic impacts and preserving visual resources.

2015 General Plan

In the current Town of Windsor General Plan-2015 (2015 General Plan), adopted in March 1996 and revised in January 2013, the Town addresses visual character and quality and scenic resources primarily in Chapters 3 and 4. The goals, policies, and objectives include creating a town identity; preserving the town's aesthetic quality and atmosphere; managing and conserving open space; protecting the water and scenic resources within the Planning Area; revitalizing the Old Town area and reinforcing its importance as the community's historic center; establishing attractive gateway commercial development that communicate Windsor's place in the wine country region; and designing residential areas to integrate with the character and quality of existing neighborhoods, and to meet local needs for public facilities and parks.

ZONING ORDINANCE

The Town of Windsor Zoning Ordinance is intended to "conserve and protect the Town's natural beauty and setting, including the rolling hills and oak trees, scenic vistas, and historic and environmental resources," among other purposes (Windsor 2014). In support of this goal, the Zoning Ordinance sets aesthetic standards that apply to all land uses, subdivisions, and development within the Town. Article 3, Site Planning and General Development Standards, provides general standards and land use-specific standards. In this section of the Zoning Ordinance, Chapter 27.20, General Property Development and Use Standards, identifies development standards applicable to all proposed development and new land uses with regard to light and glare, creek protection, the height of structures, and setbacks. Chapter 27.28, Landscaping, provides standards to preserve and enhance "the positive visual character of the Town." These zoning regulations are tools to implement the goals and policies of the General Plan, and have played a large role in determining the current aesthetic character of the Town.

4.1.2 Impact Analysis

Methodology and Significance Thresholds

The assessment of aesthetic impacts involves qualitative analysis that is inherently subjective in nature. Reactions to the same aesthetic conditions vary according to the viewer. This section evaluates the anticipated changes in the Town's visual environment from existing conditions to buildout of the proposed General Plan. It is important to underscore that the proposed project is a General Plan and does not contain specific development proposals. This analysis therefore focuses on land use changes envisioned under the proposed General Plan, and their aesthetic impacts on the community in terms of arrangement of built to open space, density and intensity of development according to the thresholds of significance discussed below.

The proposed General Plan would have a significant impact if it could facilitate physical changes that would:

1 Have a substantial adverse effect on a scenic vista.

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

3 Substantially degrade the existing visual character or quality of the site and its surroundings.

4 Create a new source of substantial light or glare than would adversely affect day or nighttime views in the area.

Project Impacts

Threshold:	Have a substantial adverse effect on a scenic vista.
Threshold:	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

IMPACT AES-1 THE 2040 GENERAL PLAN WOULD FACILITATE INCREMENTALLY GREATER LOSS OF SCENIC RESOURCES VISIBLE FROM PUBLIC VIEWPOINTS THAN WOULD DEVELOPMENT UNDER THE EXISTING 2015 GENERAL PLAN. HOWEVER, IMPLEMENTATION OF PROPOSED POLICIES WOULD PROTECT DISTANT VIEWS OF SCENIC HILLSIDES AND RIDGELINES, MINIMIZE DEGRADATION OF FOREGROUND VIEWS OF SCENIC RESOURCES LIKE AGRICULTURAL OPEN SPACE AND OAK TREES, AND PROMOTE THE DESIGN OF VISUALLY ATTRACTIVE GATEWAYS TO WINDSOR ON THE SCENIC HIGHWAY 101. THEREFORE, THE 2040 GENERAL PLAN WOULD HAVE A LESS THAN SIGNIFICANT IMPACT ON SCENIC VISTAS AND RESOURCES.

Development facilitated by the 2040 General Plan would not affect vistas from State-designated or eligible scenic highways. No State-designated scenic highways are located in the Santa Rosa Plain (Caltrans 2017). The nearest eligible scenic highway to the General Plan Area, State Route 12, is located approximately seven miles to the southeast in Santa Rosa and does not offer scenic views of Windsor because of intervening ridgelines. However, new development in Windsor would alter views from scenic roadways designated in the 2015 General Plan. Proposed changes in land use designations are clustered near gateways to Windsor on Highway 101, which the existing and proposed general plans designate as scenic throughout the Town limits.

Near the northern gateway to Windsor by Highway 101, the 2040 General Plan would facilitate changes in the type of urban development and redevelopment as compared to the 2015 General Plan. North of the Highway 101/Arata Road interchange is an area with open agricultural fields and isolated single-family residences. In this area, the 2040 General Plan would change the existing *Gateway Commercial* land use to *Very Low Density* and *Low Density Residential* land uses. This land use change would facilitate the conversion of agricultural land to residential rather than commercial uses. To the west of Highway 101 along Old Redwood Highway, the 2040 General Plan also would change existing commercial and residential land use designations to *Boulevard Mixed-Use*. Currently, a mixture of commercial developments and cultivated farmland occupy this area. The newly applied land use would facilitate the development of housing intermixed with commercial and/or office uses with extensive pedestrian-oriented frontage. On both sides of Highway 101 near the Town's northern gateway, the 2040 General Plan would facilitate a change in the character and type of potential urban development. However, it would not result in any additional loss of scenic agricultural land relative to development currently allowed under the 2015 General Plan.

Near the southern gateway to Windsor by Highway 101, land use change under the 2040 General Plan would facilitate an incremental loss of scenic agricultural farmland and mature oak trees. On a roughly-rectangular area stretching from Highway 101 to Conde Lane, the 2040 General Plan would change the existing land use from *Parks* to *Light Industrial* and *Gateway Commercial*. This area currently is agricultural land with open fields and scattered mature oak trees. While the development of a public park under the existing land use designation could allow preservation of the area's scenic open space and trees, the development of industrial or commercial buildings and associated parking would result in a greater loss of these resources. The potential loss of farmland and oak trees also would be visible from Conde Lane, a Town-designated scenic roadway.

Other proposed land use changes near the Town's southern gateway would alter the character of potential urban development on scenic agricultural land and undeveloped land with mature trees. Southwest of the Highway 101/Shiloh Road interchange, in an undeveloped area with scattered mature trees, the 2040 General Plan would change the existing land use designation from Gateway Commercial to Heavy Industrial. Southeast of the Highway 101/Shiloh Road interchange, the existing Regional Mixed Use, Compact Residential, and Parks land use designations would change to Gateway Commercial. This area is currently agricultural open space with isolated trees. Commercial development instead of parkland adjacent to Highway 101 would incrementally increase the

potential loss of scenic views from the highway. In addition, at the southern Town limits west of Highway 101, the 2040 General Plan would change the land use designation from *Light Industrial* to *Heavy Industrial*. This land use change would allow more intensive industrial development in an area with cultivated farmland next to the scenic roadway.

In summary, potential development under the 2040 General Plan could result in an incremental additional loss of scenic open space and mature oak trees that are visible from scenic roadways, especially Highway 101. However, the 2040 General Plan would not allow greater building heights that could obstruct foothill views. Therefore, new development adjacent to U.S. would not affect more distant scenic background views of foothills surrounding Windsor. Implementation of and adherence to the following 2040 General Plan policies also would minimize adverse effects on scenic vistas and resources:

Land Use Goals and Policies

Goal LU-1: Community Design. Encourage well-designed development that preserve and enhances Windsor's community character.

Policy LU-1.1 ***Create Urban/Rural Transitions***. The Town shall strive to create a strong sense of transition at Windsor's boundaries+ by encouraging the preservation of agriculturally productive lands outside the Urban Growth Boundary and by announcing entry into the Town through visually attractive gateways that incorporate landscaping, lighting, public art, and/or other distinguishing features.

Policy LU-1.2 ***Preserve Natural Features***. The Town shall preserve valuable natural features, such as oaks and waterways, within urbanized areas and clearly define the Town's form to distinguish between urban areas and the surrounding rural and agricultural areas.

Policy LU-1.4 ***Enhance Gateways***. Gateways into Windsor shall be designed to communicate Windsor's identity and place in the wine country region. New development and public improvements in gateway areas shall incorporate attractive art, special landscaping features, and well-designed buildings behind tree-lined sidewalks.

Environmental Resources Goals and Policies

Goal ER-6: Biological Resources. Protect unique and sensitive biotic features such as rare and endangered plant and animal species, dense oak woodlands, and vernal pools, and encourage sensitive design in these areas.

Policy ER-6.7 ***Preservation of Oak Woodlands.*** The Town shall encourage the preservation of oak woodlands and significant stands of oaks and heritage trees. Development plans should indicate preservation of these resources to the fullest extent feasible and restrict pavement and other encroachments within the root zones of oak trees to ensure their long-term survival. Should removal be necessary, the project applicant shall be required to plant replacement trees or removal can be done through the payment of an in-lieu fee.

Policy ER-6.8 ***Tree Protection During Construction***. The Town shall require proper measures be implemented to ensure the long-term survival of trees designated in the Tree Preservation and Protection Ordinance during construction activities. Fencing around individual trees or groups of trees shall be required to protect them from compaction and mechanical injury.

Goal ER-9: Recognize and preserve significant views and landforms along major corridors and surrounding the community.

Policy ER-9.1 ***Town-Designated Scenic Corridors*****.** The Town shall continue to recognize its scenic corridors (also referred to as scenic routes), shown in Figure ER-1, which enhance the visual experience in Windsor. The Town may amend the General Plan to officially recognize additional scenic corridors based on the following criteria:

a. Leads to a recreational area; or

b. Exhibits unusual natural or man-made features of interest, such as close-up to mid-range views of rock outcroppings, waterways, or oak woodlands.

Policy ER-9.2 ***Development Guidelines Along Scenic Corridors****.* The Town shall ensure that development proposals along scenic corridors do not detract from public viewpoints, are protected, and are harmonious and subordinate to the natural features that comprise the scenic viewshed. The Town shall require developers include components of project design that shall be considered in making this assessment include building height, massing, orientation, color, building materials, rooftop appurtenances, storage areas, signage, lighting, and low-water landscaping. The purpose of detailed development review along these corridors is to ensure that development within the viewshed preserves and enhances attractive natural and man-made vistas.

Policy ER-9.3 ***Development Guidelines Along Rural Lanes.*** The Town shall require development along scenic public roadways, such as Rural Lanes, to preserve significant public views of the surrounding foothills as well as mature vegetation that contributes to the rural atmosphere.

Policy ER-9.4 ***Development Guidelines Along Scenic U.S. Highway 101.*** The Town shall require development along the scenic U.S. Highway 101 corridor to provide open space for landscaping, and avoid a monotonous visual barrier that conflicts with the objective of providing visual access to the distant hillsides and ridgelines.

Policy ER-9.5 ***Avoid Sound Walls.*** The Town shall avoid the use of sound walls as much as possible, particularly along identified scenic corridors. Where sound walls are necessary, they shall be subject to design review to ensure attractive design.

Policy ER-9.7 ***Discourage Development on Ridgelines.*** The Town shall encourage the County to prohibit development on any skyline ridges in the Planning Area. The Town should support dedication of scenic easements from the property owner/developer for skyline ridges not intended for public access, in conjunction with any development that may occur on the remainder of the property.

Policy ER-9.8 ***Preservation of Natural Landmark Land-forms from Development.*** The Town shall work closely with Sonoma County to ensure that visually prominent hillsides and ridgelines are protected and preserved by encouraging the County to restrict building envelopes and structures on intermediate ridges, hilltops, and landforms to preserve the natural topography and contour as much as possible.

Implementation of Policies ER-9.1 through ER-9.5 would minimize degradation of scenic views from Highway 101 and other rural lanes by requiring detailed development review along scenic corridors; preservation of views of foothills, ridgelines, and mature vegetation; and avoidance of sound walls that could obstruct views, to the extent feasible. In addition, the Town would work with Sonoma County to preserve scenic landforms in unincorporated areas surrounding Windsor under Policies

ER-9.7 and ER-9.8. These policies would protect existing visual access to distant hillsides and ridgelines, which Policy I.1 in the 2015 General Plan characterizes as an objective on the scenic Highway 101 corridor.

Other policies in the 2040 General Plan also would protect scenic resources and improve visual quality in the foreground of hillside views. Implementation of Policy LU-1.2 would preserve natural features within urbanized areas, reducing the loss of mature oak trees visible from scenic roadways. Furthermore, implementation of Policies ER-6.7 and 6.8 would preserve scenic oak woodlands and significant stands of oak and heritage trees "to the fullest extent feasible" and restrict encroachments on their root zones that could impair their health. (See Impact BIO-5 in Section 4.3, *Biological Resources*, for more discussion of the impact on protected trees.) In addition, implementation of the Policies LU-1.1 and LU-1.4 would provide a sense of transition between active farmland at the Town's edge and development within the Town, as well as visually attractive gateways into Windsor.

Adherence to the above policies would minimize adverse effects on scenic vistas and resources during project-by-project environmental and design review of future development. Therefore, the 2040 General Plan would have a less than significant impact on scenic vistas and resources.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Substantially degrade the existing visual character or quality of the site and its surroundings.

IMPACT AES-2 THE 2040 GENERAL PLAN WOULD PROTECT WINDSOR'S SMALL TOWN, RURAL ATMOSPHERE BY REDESIGNATING LAND USES FOR TARGETED INFILL DEVELOPMENT, MAINTAINING DEVELOPMENT INTENSITIES IN SINGLE-FAMILY RESIDENTIAL AREAS, AND FACILITATING THE DEVELOPMENT OF DISTINCTIVE GATEWAYS BY THE NORTHERN AND SOUTHERN TOWN LIMITS. COMPLIANCE WITH EXISTING STANDARDS AND PROPOSED GENERAL PLAN POLICIES WOULD ENSURE THAT NEW DEVELOPMENT COMPLEMENTS AND ENHANCES THE TOWN'S EXISTING VISUAL CHARACTER AND QUALITY. THEREFORE, THE PROJECT WOULD HAVE A LESS THAN SIGNIFICANT IMPACT ON VISUAL CHARACTER AND QUALITY.

As discussed in the Setting, Windsor enjoys a small town, rural atmosphere owing to its relatively compact development pattern and the prominence of natural resources like mature oak trees and surrounding hillsides. The 2040 General Plan's overall land use vision would preserve the Town's existing development pattern through targeted infill development. As discussed in the Land Use and Community Design Element, "(a) principal philosophy of the General Plan is the prioritization of infill development over development at the fringe." Infill development would incrementally increase density in specified arterial corridors. The 2040 General Plan would redesignate a mixture of existing commercial and residential land uses to Boulevard Mixed-Use along two segments of Old Redwood Highway: from Highway 101 to Windsor Plains Drive, and from north of Starr Road to south of Arata Lane. The *Boulevard Mixed-Use* designation would facilitate a transformation of Old Redwood Highway to "an attractive boulevard with nodes of mixed-use high-density development." Residential development under this land use could reach a density of 16-32 dwelling units/acre, the highest allowed under the existing and proposed general plans.

The 2040 General Plan envisions redevelopment of the Old Redwood Highway corridor as an opportunity to create distinctive gateways and streetscaping by the northern and southern Town limits. These areas currently lack distinct transitions from rural, agricultural landscapes in neighboring unincorporated Sonoma County to more urban development in Windsor. The northern gateway would remain designated for Gateway Commercial uses, with the intention of providing a regional-serving retail area that serves as an attractive Town entrance. The southern gateway, in the Shiloh Road area, would be a mixed-use village centered on a large plaza, consistent with the Town's existing Shiloh Road Village Vision Plan (2001).

Outside of higher-density arterial corridors, the 2040 General Plan would largely maintain existing development intensities. This would be expected to have the effect of maintaining the Town's small-town, rural character in existing single-family residential neighborhoods, which are clustered to the east of Highway 101 and in the west-central and northwest parts of Windsor (Windsor 2015a). The 2040 General Plan also intends to enhance this visual character by avoiding the development of walled-in tract subdivisions, a development type typical of the 1970s and 1980s. Instead, the 2040 General Plan would promote compact neighborhoods that provide greater visual interest. Such development would be more compatible with the varied architecture of older residences in Windsor. In addition, the 2040 General Plan could result in the potential development of the north of Arata Lane area and the east of Jensen Lane area. Both areas are largely undeveloped and predominately agricultural. These areas would be converted to more urban land uses and may impact existing visual character. The following policies in the 2040 General Plan would provide direction for the desired visual character and quality in Windsor:

Land Use Goals and Policies

Goal LU-1: Community Design. Encourage well-designed development that preserve and enhances Windsor's community character.

Policy LU-1.1 ***Create Urban/Rural Transitions*****.** The Town shall strive to create a strong sense of transition at Windsor's boundaries by encouraging the preservation of agriculturally productive lands outside the Urban Growth Boundary and by announcing entry into the Town through visually attractive gateways that incorporate landscaping, lighting, public art, and/or other distinguishing features.

Policy LU-1.2 ***Preserve Natural Features*****.** The Town shall preserve valuable natural features, such as oaks and waterways, within urbanized areas and clearly define the Town's form to distinguish between urban areas and the surrounding rural and agricultural areas.

Policy LU-1.3 ***Encourage Encounters with Nature*****.** The Town shall encourage frequent encounters with the surrounding landscape through the use of community separators, the preservation of strategic view corridors, the preservation of open space, and the provision of trails and paths that connect neighborhoods to open space.

Policy LU-1.4 ***Enhance Gateways*****.** Gateways into Windsor shall be designed to communicate Windsor's identity and place in the wine country region. New development and public improvements in gateway areas shall incorporate attractive art, special landscaping features, and well-designed buildings behind tree-lined sidewalks.

Policy LU-1.7 ***Compatible Design.*** The Town shall encourage new residential development within existing neighborhoods to include building designs that provide diversity while maintaining compatibility with the scale, massing, and heights of the existing homes. Criteria for determining compatible development are defined in design standards for the Town.

Policy LU-1.8 ***Transitions in Scale.*** The Town shall require that the scale and massing of new development in higher-density areas provide appropriate transitions in building height and bulk and are sensitive to the physical and visual character of adjoining lower-density neighborhoods.

Policy LU-1.10 ***Create Visual Interest***. The Town shall encourage building design and architecture that create visual interest and engaging spaces along streets, maintain an attractive environment, and promote informal surveillance of public spaces by building occupants. Whenever possible, building fronts should not be dominated by garage doors, vehicle parking areas, or blank walls.

Policy LU-1.11 ***Regional Design Standards.*** The Town shall encourage building design and architecture that conveys purpose, time and place; responds to Windsor's climate; conserves energy; and uses durable materials.

Policy LU-1.12 ***Design Review.*** The Town shall review development proposals for their adherence to this General Plan's policies regarding the location, intensity, and character of development. The Planning Commission shall have primary responsibility in the review of development applications.

Goal LU-2: Residential Development. Promote the preservation of development of residential neighborhoods that provide a variety of housing types, densities, and designs that address the diverse needs of Windsor residents of all ages and socio-economic groups.

Policy LU-2.7 ***Clustering Residential Development*****.** The Town shall allow for the clustering of residential uses and the use of creative site planning techniques when environmentally-sensitive areas are present on a site.

Policy LU-2.8 ***Reduced Density in Environmentally-Sensitive Areas*****.** The Town shall allow residential development below the minimum density when the established density standards are infeasible due to the presence of environmentally-sensitive areas on a site.

Goal LU-3: Commercial Development. Promote attractive and vibrant neighborhood, community, and regional commercial centers that provide convenient and enhanced opportunities for shopping, services, entertainment, and social interaction.

Policy LU-3.2 ***Connectivity to Neighborhoods*****.** The Town shall encourage commercial areas to be linked to adjoining residential neighborhoods by well-designed and attractive streetscapes that have well-designed buildings fronting on tree-lined sidewalks with bicycle paths and street amenities.

Policy LU-3.3 ***Discourage Strip Commercial*****.** The Town shall discourage new strip commercial development, particularly along Old Redwood Highway and Shiloh Road.

Policy LU-3.5 ***Appearance of Gateway Commercial Uses*****.** Because of the visibility and strategic location at gateways into the town, the Town shall require that commercial uses at the Shiloh Road and Arata Lane interchanges with U.S. 101 are carefully designed to convey an attractive, aesthetically- enhanced appearance that distinguishes the area as an entry into Town and reflects Windsor's identity. Project features that should be specifically examined include signage, lighting, landscaping, building scale and orientation, the visual and architectural quality and appearance of development that is visible from a public street or highway setbacks from U.S. 101, and parking areas.

Goal LU-4: Mixed-Use Development. Create well-defined nodes of activity containing an integrated mix of commercial, office, and residential uses that enable Windsor residents to live close to businesses and services, reduce automobile use, and actively encourage pedestrian activity.

Policy LU-4.1 ***Mixed-Use Objectives*****.** Mixed use projects should comply with the following objectives:

- A blend of uses that are physically and functionally integrated to create a synergy between different uses and a unique sense of place
- Compact development that reduces reliance on automobiles and promotes transit, walking, and biking
- Pedestrian-oriented design with active uses built up to the sidewalks
- A comfortable public realm that encourages community members to gather and socialize
- Increased economic vitality
- Crime prevention and security by providing building facades behind sidewalks that provide eyes on the streets.

Policy LU-4.2 ***Compatibility with Adjoining Uses*****.** The Town shall require higher-density mixed-use development to use setbacks, stepbacks, screening, and/or landscaping to achieve compatibility with adjacent land uses, particularly residential uses.

Goal LU-6: General Location and Pattern of Growth. Encourage an orderly, contiguous pattern of development that prioritizes infill development, preserves resources, enhances livability, strengthens the local economy, and furthers Windsor's small town feel.

Policy LU-6.3 ***Encourage Higher Intensity Development in Appropriate Locations.*** The Town shall encourage higher intensity uses where they would:

a. be within a reasonable walking distance of the Downtown/Station Area or other commercial/service areas
b. take advantage of convenient access to U.S. 101 and the Town's crosstown streets
c. take maximum advantage of existing and future public transit stops, specifically bus and rail service.

Goal LU-7: Urban Growth Boundary. Establish an Urban Growth Boundary with sufficient land to accommodate the Town's growth for the next 20 years.

Policy LU-7.1 ***Establish Urban Growth Boundary.*** An Urban Growth Boundary is established as shown on the Land Use Plan Map (Figure LU-1) to encourage a compact, cohesive pattern of urbanization with definite, identifiable boundaries that more readily create a sense of community identity. No new Town development other than that authorized by the Open Space, Parks, and Public/Quasi-Public/Institutional land use designations shall be permitted outside the Urban Growth Boundary.

Policy LU-7.3 ***Exclude Natural Areas from UGB.*** Areas that have limited potential to accommodate urban development are not included in Windsor's Urban Growth Boundary. Such areas may include those that have extensive sensitive biological habitats supporting rare and

endangered species, oak woodlands, and wetlands; active and viable agricultural production; or extensive areas of community separators.

Policy LU-7.12 ***Limit Service Extensions Outside UGB.*** Sewer, water, and other Town services shall not be extended to new development outside the Urban Growth Boundary nor shall service to existing development outside the Urban Growth Boundary be expanded unless the Town Council makes each of the following findings:

a. The land use to which the service would be extended or expanded is consistent with all applicable policies of the Town's General Plan ~~in effect as of October 2, 1997~~; and

b. The land use to which the sewer service would be extended or expanded is compatible with open space uses as defined in the General Plan ~~in effect as of October 2, 1997~~, does not interfere with accepted agricultural practices, and does not adversely affect the stability of land use patterns in the area; and

c. The property to which the service would be extended or expanded is immediately adjacent to land already served by the service(s) to be extended; and

d. Specific Circumstances, unique to the property to which the service would be extended or expanded would otherwise deprive the property of privileges enjoyed by other comparable property outside the Urban Growth Boundary and in the vicinity of the property to be served; and

e. In addition to payment of applicable capacity fees and connection charges, the property to which the service would be extended or expanded shall bear the cost of extending and/or expanding the Town pipes and appurtenances for water, sewer, and/or recycled water service to the property, including an alignment of the service that is determined by the Town Engineer and in compliance with Town Standards; and

f. The property to which the service would be extended or expanded shall be subject to the same rules and regulations as other Town customers for water, sewer, and/or recycled water service to the property, said rules and regulations at the time of application including but not limited to water conservation measures, metering of individual residential units, pretreatment, fire service, etc.[1]

Old Redwood Highway

Policy LU-12.1 ***Transform Old Redwood Highway.*** The Town shall actively seek opportunities to support the transformation of Old Redwood Highway into an attractive boulevard that has sidewalks, bicycle lanes, consistent landscaping, and wayfinding signs.

Policy LU-12.6 ***Old Redwood Highway Boulevard Design Plan.*** The Town shall adopt a boulevard design plan to create a guide for cohesive urban form along Old Redwood Highway. The design plan shall provide standards for setbacks, lot coverage, height, parking, pedestrian connections, landscaping, preservation of oak trees, and sign standards.

[1] Strike out and underlines shows the changes to the 2040 General Plan policies that would come into effect as part of the 2017 UGB ballot measure. If the 2017 UGB ballot measure does not pass, the strike out and underline will not be incorporated into the 2040 General Plan. This EIR assumes passage of the 2017 UGB ballot measure.

Shiloh Road East

> **Policy LU-13.8** ***Neighborhood Compatibility.*** The Town shall ensure that development of the mixed use parcels on the south side of Shiloh Road considers the interface with the lower-density parcels to the south. The mixed use area shall be connected, and not walled off from, the lower-density residential area, but still designed in a way that reduces conflict and promotes compatibility between uses.

Proposed policies in the 2040 General Plan would promote the preservation of scenic natural resources and the development of visual transitions to the Town. Implementation of the Policies LU-1.1, LU-1.4, LU-3.5 would provide a sense of transition between active farmland at the Town's edge and development within the Town, as well as visually attractive gateways into Windsor. Policies pertaining to the Town's Urban Growth Boundary (UGB) also would protect agricultural open space outside the General Plan Area, preserving farmland surrounding Windsor that contributes to the Town's rural visual character. Under Policy LU-1.2, the Town would preserve scenic natural features within the urbanized area, such as oaks and waterways. Similarly, implementation of Policies ER-6.7 and ER-6.8, as discussed in Impact AES-1, would preserve scenic oak woodlands and significant stands of oak and heritage trees "to the fullest extent feasible" and restrict encroachments on their root zones that could impair their health. In addition, implementation of Policies LU-2.7 and LU-2.8 would minimize the loss of environmentally sensitive areas by clustering new residential development away from them or reducing residential density.

Other proposed policies would enhance the visual appeal of new urban development and its compatibility with existing land uses. Policies LU-3.3 and LU-12.1 are intended to improve visual quality in existing commercial areas. Their implementation would discourage new strip commercial development, especially on Old Redwood Highway and Shiloh Road, and transform Old Redwood Highway to an attractive boulevard with consistent landscaping. Policies LU-1.7 would further the 2040 General Plan's vision of building more compatible residential development, encouraging new residences in existing neighborhoods to provide diversity of design while maintaining compatibility in scale, massing, and height. Implementation of Policies LU-1.8 and LU-13.8 would provide for appropriate transitions in scale between higher-density areas and adjoining lower-density neighborhoods. The appearance of streetscapes would be improved by implementation of Policies LU-1.1, LU-3.2 and LU-4.1. These policies would promote building placement that fronts on sidewalks and building design that creates visual interest and engaging spaces along streets. Design review of proposed new development, pursuant to Policy LU-1.12, would ensure that it abides by the above policies for visual character and quality.

As discussed above, the 2040 General Plan would protect Windsor's small town, rural atmosphere by redesignating land uses for targeted infill development, maintaining residential development intensities, and envisioning distinctive gateways by the northern and southern Town limits. All new development and modification to existing structures would also be subject to existing design, density, and height standards applicable to particular land use and zoning designations. Compliance with established standards and the above policies proposed in the 2040 General Plan would ensure that new development complements and enhances the Town's existing visual character and quality. Therefore, the project would have a less than significant impact on visual character and quality.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Create a new source of substantial light or glare than would adversely affect day or nighttime views in the area.

IMPACT AES-3 NEW DEVELOPMENT FACILITATED BY THE PROPOSED GENERAL PLAN COULD INCREASE LIGHT AND GLARE EFFECTS ON SENSITIVE RECEPTORS, SUCH AS RESIDENTIAL USES. NEW DEVELOPMENT WOULD BE SUBJECT TO EXISTING REGULATIONS IN THE TOWN'S ZONING ORDINANCE AND PROPOSED GENERAL PLAN POLICY TO PROTECT DARK SKIES AT NIGHTTIME. HOWEVER, PROPOSED GENERAL PLAN POLICIES DO NOT SPECIFY HOW ANTICIPATED LIGHT AND GLARE WOULD BE REDUCED. THEREFORE, THE PROJECT WOULD HAVE A SIGNIFICANT BUT MITIGABLE IMPACT ASSOCIATED WITH LIGHT AND GLARE.

The proposed General Plan would facilitate new development that could introduce new sources of light and glare in Windsor, resulting in increased ambient nighttime lighting. New sources of light and glare could be installed for infill development, new development in currently vacant or undeveloped lots, or modification of existing buildings. Specific sources would include streetlights, light fixtures in parking lots, signage on businesses, exterior building illumination, interior lighting passing through building fenestration, and outdoor lighting at recreational facilities. Reflective building and vehicles surfaces, and the headlights of motor vehicles, could generate additional glare.

Adherence to proposed General Plan policy and existing Zoning Ordinance requirements would minimize adverse effects from light spillover to nearby properties and glare. Policy LU-1.13 in the 2040 General Plan is intended to minimize sky glow (the brightness of the sky at nighttime from the emission of upward light).

> **Policy LU-1.13:** ***Design to Protect Night Skies.*** The Town shall protect dark/night skies by requiring outdoor lighting to be shielded and/or directed downward to limit overspill and glare, without compromising the safety and security of the community.

Implementation of this policy would ensure that new sources of outdoor lighting in development facilitated by the 2040 General Plan would be shielded and/or directed downward to limit nighttime sky glow. This policy also would minimize light spillover to nearby properties where people may be sensitive to ambient lighting conditions. Implementation of General Plan policy LU-1.13 would reduce impacts to a less than significant level. To ensure implementation of policy LU-1.13, Mitigation Measure AES-1 requires that the policy be implemented with an ordinance that contains lighting standards that are specific to night sky protection. The International Dark-Sky Association and the Illuminating Engineering Society of North America approved the Model Lighting Ordinance, an outdoor lighting template designed to help municipalities develop outdoor lighting standards that reduce glare, light trespass, and skyglow. Mitigation Measure AES-1 ensures that implementation of General Plan policy LU-1.13 would occur with guidance from the approved Model Lighting Ordinance.

Existing general performance standards for light and glare at land uses in Section 27.20.030 of the Windsor Zoning Ordinance would further minimize light spillover from all new development. According to these standards, "All outdoor illumination, including security lighting, shall be indirect or diffused and directed downward, away from adjacent properties and public rights-of-way," and light fixtures shall have reflectors to minimize glare. By complying with lighting standards and the implementation of AES-1, nighttime lighting associated with new development would not have substantial adverse effects on sensitive land uses.

Individual projects facilitated by the proposed General Plan would be subject to CEQA review. New lighting associated with these projects would be reviewed on an individual basis and would be regulated by the Town's Zoning Ordinance. Adherence to existing Town lighting requirements, the proposed General Plan policy and Mitigation Measure AES-1 would reduce impacts to a less than significant level.

Mitigation Measures

Impacts associated with increased ambient nighttime lighting facilitated by the General Plan would be reduced through implementation of Mitigation Measure AES-1.

AES-1 Nighttime lighting Measures

Land Use Policy LU-1.13 shall be updated to read:

> ***Design to Protect Night Skies*.** The Town shall protect dark/night skies by requiring outdoor lighting to be shielded and/or directed downward to limit overspill and glare, without compromising the safety and security of the community, through implementation of lighting standards in a "Dark Skies" ordinance with guidance from the Model Lighting Ordinance approved by the International Dark-Sky Association and the Illuminating Engineering Society of North America.

Significance After Mitigation

Impacts would be less than significant with implementation of Mitigation Measure AES-1.

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4.2 Agricultural Resources

This section evaluates impacts on agricultural resources from implementation of the 2040 General Plan. Both direct impacts associated with the conversion of agricultural land to non-agricultural use in the proposed project site and potential indirect impacts to adjacent agricultural operations are discussed.

4.2.1 Setting

Overview of Agriculture

California Agriculture

California agriculture ranks first in the nation in productivity and its 77,500 farms and ranches received $47.1 billion for their products in 2015, down from the $56.6 billion received in 2014. California produces over 400 commodities and nearly half of all U.S. grown fruits, nuts, and vegetables on its 25.5 million acres of farmland (U.S. Department of Agriculture 2017).

Regional Agriculture

Agriculture is an important part of the economy in Sonoma County. The total value of the 15 top crop groupings countywide in 2015 was over $746 million. The majority ($447 million, or about 59 percent) of agriculture is wine grapes (Sonoma County 2015). Table 6 shows the top 15 crop values in 2015 for major crop groupings in Sonoma County. The 2014 total crop value for agricultural products in the County was approximately $8.9 million and the 2015 total crop value was approximately $7.5 million. The largest decrease in crop value from 2014 to 2015 was in wine grapes, which decreased from approximately $529 million in 2015 to $446 million in 2015. Several crop groupings increased in value over this time period including market milk, cattle and calves, nursery miscellaneous, and nursery ornamentals.[2]

[2] Although marijuana cultivation is considered an acceptable use of agricultural land by the State, the Town of Windsor has adopted an ordinance banning outdoor cultivation of nonmedical marijuana (Ordinance No. 2017-318).

Table 6 Sonoma County Annual Agricultural Crop Report

2014 Crop Grouping	2014 Crop Value	2015 Crop Grouping	2015 Crop Value
Wine Grapes	$592,798,000	Wine Grapes	$446,538,900
Market Milk	$109,540,900	Market Milk	$119,344,600
Poultry	$65,445,200	Livestock and Poultry Product	$53,291,300
Livestock and Poultry Products	$54,198,100	Livestock and Poultry	$46,124,100
Cattle and Calves	$15,383,900	Cattle and Calves	$21,469,600
Vegetables	$12,613,200	Nursery - Miscellaneous	$13,067,700
Nursery - Miscellaneous	$11,770,300	Vegetables	$12,355,200
Sheep and Lambs	$7,572,900	Nursery - Ornamentals	$10,638,100
Nursery - Ornamentals	$7,377,400	Sheep and Lambs	$6,992,900
Nursery – Cut Flowers	$4,187,800	Nursery – Cut Flowers	$4,548,400
Apples – Late Varieties	$2,332,100	Nursery – Bedding Plants	$4,005,800
Rye and Oat Silage	$1,559,100	Rye and Oat Silage	$3,228,900
Rye and Oat Hay	$1,386,100	Apples – Late Varieties	$2,637,400
Nursery – Bedding Plants	$1,136,500	Rye and Oat Hay	$1,338,700
Apples – Gravenstein	$1,079,800	Apples – Gravenstein	$1,115,000
Total	**$888,381,300**	**Total**	**$746,696,600**

Source: Sonoma County Agricultural Commissioner, Sonoma County Crop Report 2015 and 2014

Important Farmlands

The State mapping of significant farmlands as part of a national Important Farmland Inventory System (additional detail provided in the Regulatory Setting section below) identifies those agricultural lands that are of Prime Importance, Statewide Importance, Unique, Locally Important, and Grazing Land. These designations indicate which lands are used for cultivation compared to the Soil Conservation Service's Land Capability Classification system which rates soils for their potential to support cultivation. A description of each of the five categories is provided below.

- **Prime Farmland.** Prime farmland is land with the best combination of physical and chemical features able to sustain long-term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. The land must have been used for the production of irrigated crops at some time during the two update cycles prior to the most recent mapping date (the most recent map update for the region is 2008).
- **Farmland of Statewide Importance.** Farmland of statewide importance is land similar to prime farmland, but with minor shortcomings, such as greater slopes or with less ability to hold and store moisture. The land must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date.
- **Unique Farmland.** Unique farmland is land of lesser quality soils used for the production of the State's leading agricultural crops (i.e., crops of high economic value, such as oranges, olives, avocados, rice, grapes, and cut flowers). This land is usually irrigated, but may include non-irrigated orchards or vineyards, as found in some climatic zones of California. The land must have been cultivated at some time during the two update cycles prior to the mapping of 2008.

- **Farmland of Local Importance.** Farmland of local importance is land that is important to the local agricultural economy, as determined by each County's Board of Supervisors and a local advisory committee. In Sonoma County, farmland of local importance has been identified as soils that are listed as prime farmland or farmlands of statewide importance that are not irrigated, and soils growing dry land crops – beans, grain, dry land walnuts, and dry land apricots.
- **Grazing Land.** Grazing land is land on which the existing vegetation is suited to the grazing of livestock. The minimum mapping unit for this category is 40 acres

As shown in Figure 5 and Table 7, the majority of the area within the General Plan Area (4,341.7 acres) in 2014 was comprised of Urban and Built-Up Land. About one percent (46.3 acres) is designated as Prime Farmland; 2.3 percent (99.9 acres) as Farmland of Statewide Importance; and 13.3 percent (580.0 acres) as Farmland of Local Importance. In addition, there are 177.1 acres (4.1 percent) of Grazing Land (DOC 2014). Compared to 2010 Farmland of Statewide Importance and Farmland of Local Importance has decreased, while the acreage of Prime Farmland and Grazing Land has remained the same. However, the total acreage of farmland in the General Plan area has decreased since 2010 (Table 8). Figure 6 shows lands in the vicinity of the General Plan Area that are under Williamson Act contracts, all of which are located outside of the General Plan Area (Town of Windsor 2015a).

Table 7 Important Farmlands in the General Plan Area

Farmland Designation	2010 Acres	Percent of 2010 Total Land	2014 Acres	Percent of 2014 Total Land
Prime Farmland	46.3	1.0	46.3	1.0
Farmland of Statewide Importance	116.0	2.7	99.9	2.3
Farmland of Local Importance	586.6	13.5	580.0	13.3
Grazing Land	177.1	4.1	177.1	4.1
Urban and Built-Up Land	3,415.1	78.7	3,437.7	79.3
Total Farmland	**925.9**		**903.2**	

Source: California Department of Conservation 2010 and 2014

Conversion of Farmlands in the Region

Conversion of farmlands is the loss of farmlands due to development or land use changes that do not support agricultural production. The California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP), which updates its maps biennially, provides land use conversion information for decision makers to use in their planning for the present and future of California's agricultural land resources. Table 8 shows the number of acres that have been converted in Sonoma County from 2010 to 2012, the most recent data available. As shown in Table 8, between 2010 and 2012, the County lost 1,933 acres of agricultural land and gained 1,979 acres, resulting in a net decrease of 14 acres.

Figure 5 Farmland in the Town of Windsor

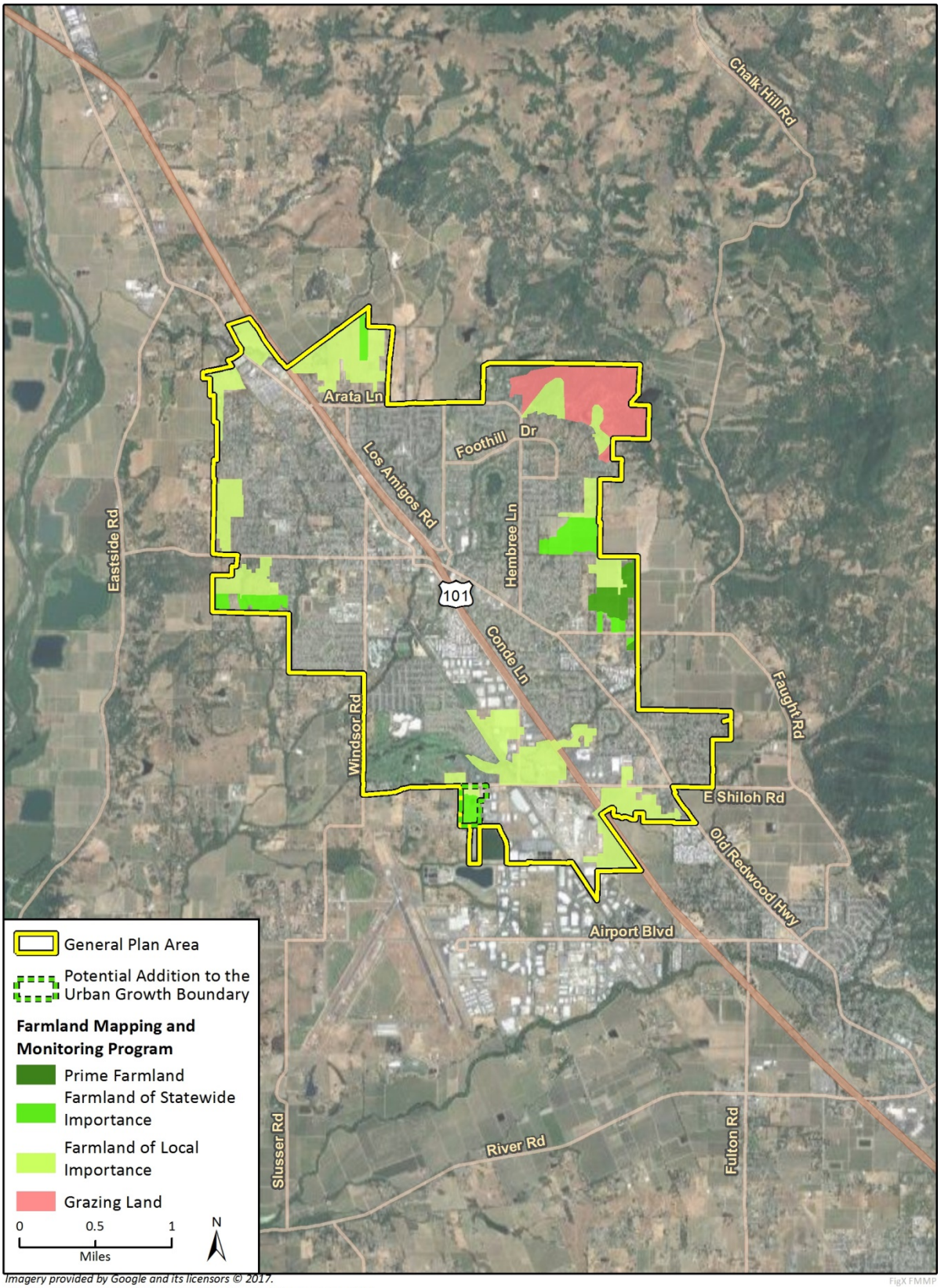


Figure 6 Williamson Act Contract Lands

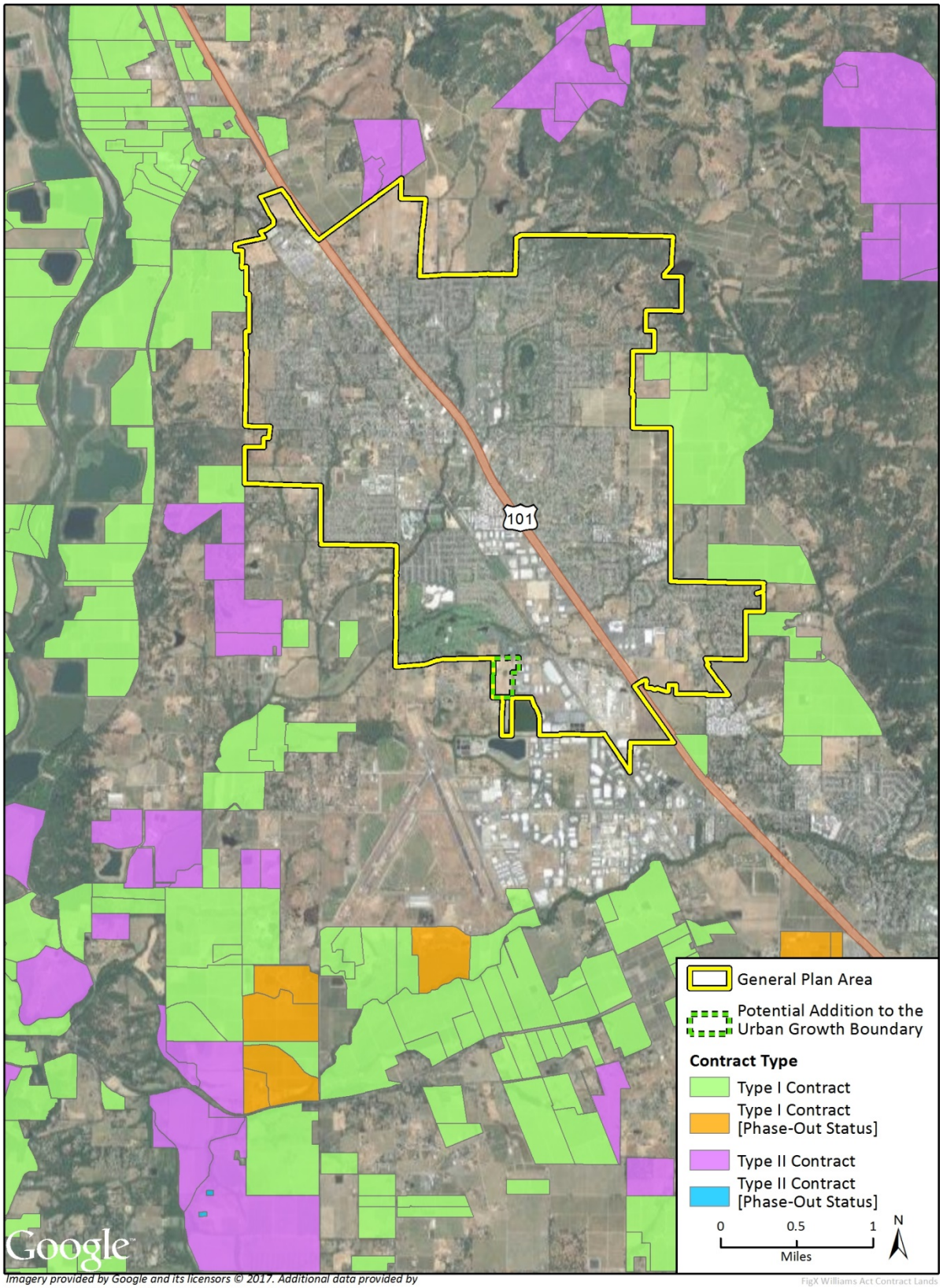


Table 8 Sonoma County Land Conversion

	Total Acres Inventoried			2010-2012 Acreage Changes		
Land Use Category	**2010**	**2012**	**Acres Lost**	**Acres Gained**	**Total Acreage Changed**	**Net Acreage Changed**
Prime Farmland	29,938	29,882	342	286	628	-56
Farmland of Statewide Importance	17,192	17,213	129	150	279	21
Unique Farmland	32,924	33,079	210	365	575	155
Farmland of Local Importance	80,194	80,741	529	1,076	1,605	547
Important Farmland Subtotal	160,248	160,915	1,210	1,877	3,087	667
Grazing Land	417,772	417,091	783	102	885	-681
Agricultural Land Subtotal	578,020	578,006	1,993	1,979	3,972	-14
Urban and Built-up Land	75,213	75,258	36	81	117	45
Other Land	355,314	355,296	125	107	323	-18
Water Area	17,533	17,520	13	0	13	-13
Total Area Inventoried	**1,026,080**	**1,026,080**	**2,167**	**2,167**	**4,334**	**0**

Source: California Department of Conservation 2015

Agricultural/Urban Interface Issues

Development in and adjacent to agricultural areas in the General Plan Area can create a variety of potential conflicts for both growers and urban uses. Existing areas of potential conflict are located to the east, south, and northwest of the General Plan Area where there is active agricultural production adjacent to sensitive land uses such as residences. Potential agricultural/urban land use conflicts can arise from the following activities, among others:

Potential Concerns for Urban Neighbors

- Use of pesticides/dust problems in vicinity of residential neighborhoods, particularly near schools
- Odors and health concerns associated with fertilizer/pesticide application and livestock
- Noise related to farming equipment or farm worker activities
- Farm worker parking

Potential Concerns for Agricultural Interests

- Restrictions on activity arising from neighbor concerns/complaints
- Loss of revenue and competitiveness
- Competition for water and land

Regulatory Setting

State

Farmland Mapping and Monitoring Program

The DOC's FMMP monitors the conversion of the State's farmland to and from agricultural use. County-level data is collected and a series of maps are prepared that identify eight classifications and uses based on a minimum mapping unit size of 10 acres. The program also produces a biennial report on the amount of land converted from agricultural to non-agricultural use. The program maintains an inventory of State agricultural land and updates the Important Farmland Series Maps every two years. The FMMP is an informational service only and does not constitute State regulation of local land use decisions. Agricultural land is rated according to several variables, including soil quality and irrigation status with Prime Farmland being considered the most optimal for farming practices. Other FMMP designations include Farmland of Local Importance, Grazing Land, and Water.

Land Conservation Act

Better known as the Williamson Act (California Administrative Code Section 51200 et seq.), the California Land Conservation Act of 1965 creates a legal arrangement whereby private landowners contract with local governments to voluntarily restrict land to agricultural and open space uses, protecting it from unnecessary or premature conversion to urban uses. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use rather than potential market value, which saves landowners from 20 percent to 75 percent in property tax liability each year.

Generally, Williamson Act contracts have an initial term of ten years, with renewal occurring automatically each year thereafter. The contracts run with the land and are binding on all succeeding landowners. Land must be in an agricultural preserve in order to enter into a Williamson Act contract. Agricultural preserves under Williamson Act contract contain at least 100 contiguous acres of agricultural land unless specific findings are made.

Non-renewal initiations are requested either by the landowner or the local government and are often filed in anticipation of converting farmland to other uses. Most contracted land is terminated through non-renewal. Upon the expiration of the contract, the restrictions are removed and the property tax assessment, which had been gradually increasing over the previous nine year non-renewal period, returns to full market value.

Local

Local Agency Formation Commission (LAFCO) Boundary Controls

The Sonoma County LAFCO is a seven-member body with two members from the Board of Supervisors, two members from city councils in the county, two members from independent special districts, and one public member. There are also four alternate members: one from the Board of Supervisors, one from a city council, one from an independent special district, and one public. State law requires LAFCOs to consider agricultural land and open space preservation in all decisions related to expansion of urban development.

Zoning Ordinance

The Town of Windsor Zoning Ordinance does not have a specific agricultural zone; however agriculture is an allowed use in most zoning districts (including residential, industrial, and open space).Chapter 27.24 (Agricultural Preservation) of the Zoning Ordinance is intended to preserve and protect agricultural uses, support continued agricultural operations, and alert prospective residents to the importance of agricultural land provisions. Section 27.24.020 (Buffering) requires a buffer between new urban development and existing agricultural operations. The buffer must be at least 100 feet wide near row and field crops (e.g., hay and vegetables) and 200 feet from vineyards and orchards (e.g., wine grapes and apples).

The Agricultural Preservation Ordinance (Chapter 27.24.030 [Disclosure]) of the Zoning Ordinance) has been adopted by Windsor to reduce nuisance complaints about farm operations from residential neighbors. This is a disclosure measure of nearby agriculture for subdivision maps and new building permits. Under the ordinance, purchasers of subdivided property near agricultural areas and purchasers of new buildings for human occupancy are informed about the possible negative impacts of residing near normal farm operations (e.g., pesticide use, dust, and noise) by notation on the subdivision map or a statement accompanying the building permit. The ordinance is intended to protect existing farming operations from pressure to cease or curtail operations when residential development occurs nearby.

Urban Growth Boundary

The Town's UGB functions as a local planning tool to regulate growth in the region. The UGB was established to accommodate orderly and efficient growth and preserve and protect surrounding agricultural lands. Urbanization concentrated within the boundaries of the UGB prevents urban sprawl and reduces the potential for impacts to environmental resources that may occur as a result of urban sprawl.

4.2.2 Impact Analysis

Methodology and Significance Thresholds

An impact is considered significant if physical changes that could be facilitated by buildout of the General Plan Update would result in one or more of the following conditions, which are based upon the environmental checklist in Appendix G of the *State CEQA Guidelines*:

1. 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
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract
3. 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))
4. Result in the loss of forest land or conversion of forest land to non-forest use
5. 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

See Section 4.17, *Effects Found not to be Significant*, for discussion of significance thresholds 2, 3, and 4. In addition to the checklist questions above, this section also addresses potential land use conflicts between urban and agricultural uses.

Project Impacts and Mitigation Measures

Threshold:	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 or 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.

IMPACT AG-1 DEVELOPMENT PROPOSED IN THE 2040 GENERAL PLAN IS DESIGNED TO ENCOURAGE THE CONTINUED OPERATION OF EXISTING AGRICULTURE IN AND SURROUNDING THE TOWN. HOWEVER, BUILDOUT OF THE 2040 GENERAL PLAN WOULD RESULT IN THE CONVERSION OF ACTIVE AGRICULTURAL LAND. THEREFORE, IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

As discussed in the Setting, the County produced over $740 million in crops in 2015 and the majority of crops in the Town are wine grapes, orchards, and pastureland. The 2040 General Plan prioritizes infill development, maximizing the underutilized parcels in the Town, and establishing a defined community edge with a transition between farmland on the Town's edge and development in the Town. Therefore, the guiding vision of the 2040 General Plan would limit the loss of agricultural resources. In addition, Windsor's agricultural heritage is a mainstay of the Town's local economy and the Windsor Farmers Market, farm trails, and wine trails are three of the major collaborators in the Windsor Economic Development Strategic Plan (2008). Strategic Initiative 4 of the Windsor Economic Development Strategic Plan is to further capitalize on agriculture through agritourism and culinary production expansion (Windsor 2008).

FMMP mapped agricultural land occurs in the north, south, west, and east portions of the General Plan Area (Figure 5). The majority of farmland in the southern portion of the General Plan Area is mapped as Farmland of Local Importance and designated light industrial and heavy industrial in both the 2015 General Plan and 2040 General Plan. North of Arata Lane is mapped as Farmland of Statewide Importance and Farmland of Local Importance. Under the 2015 General Plan this area is designated as surrounding residential, high density residential, village residential, neighborhood center/mixed-use, and gateway commercial. The 2040 General Plan designates this area as very low residential, low density residential, medium density residential, general business, and neighborhood center/mixed-use.

Farmland of Statewide Importance and Farmland of Local Importance mapped by the FMMP in the west portion of the General Plan Area is designated as Estate Residential under the 2015 and 2040 General Plans. The Estate Residential designation permits agricultural production. Farmland of Local Importance west of Highway 101 is designated as light industrial and parks under the 2015 General Plan and would remain light industrial under the 2040 General Plan. The 2040 General Plan removes the parks designation and changes it to gateway light industrial, similar to surrounding land uses.

The eastern portion of the General Plan Area contains farmland designated by the FMMP as Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Grazing Land. The 2015 General Plan contains an agricultural buffer overlay and designates the parcels as estate residential, park, surrounding residential, and neighborhood center mixed-use. The 2040 General

Plan would change the land use designations in this area to rural residential, estate residential, very low residential and open space. These land use changes would significantly reduce the amount of agricultural land converted to urban uses, reducing the development potential by more than 600 residential homes.

The northwest portion of the General Plan Area is mapped by the FMMP as Farmland of Local Importance. This area is currently designated as gateway commercial and estate residential under the 2015 General Plan. The majority of the estate residential designated land in this area contains residences and does not support agriculture, even though agriculture is a permitted use in this land use designation. Similar to the 2015 General Plan, the 2040 General Plan designates these parcels as Gateway Commercial and Estate Residential.

As discussed above, adoption of the 2040 General Plan, as compared to the 2015 General Plan, would result in changes in land use designations for areas mapped as agriculture in the north, east, and west portions of the Town. Full buildout of the 2040 General Plan would result in a loss of agricultural lands including those mapped as Farmland. Development in accordance with the land use designations of the 2040 General Plan would reduce existing agriculture production in the General Plan Area, specifically in areas north of Arata Lane and north and south of Jensen Lane. South of Jensen Lane designations would be downzoned as a result of the 2040 General Plan compared to the 2015 General Plan. This would result in less urbanization under the proposed 2040 General Plan and thus a reduction in the potential to convert existing agriculture lands to non-agriculture uses. Nevertheless, conversion of agricultural lands compared to existing conditions may occur as a result of buildout and development associated with the 2040 General Plan.

The Economic Development Element of the 2040 General Plan seeks to support and expand the wine/craft beverage industry, agricultural industry, and related tourism, while the Environmental Resources Element is designed to encourage the continued operation of agricultural lands in and around Windsor. The goals and policies listed below from the 2040 General Plan address the preservation of agricultural lands. Specifically, the following policies in the Environmental Resources and Economic Development Elements are designed to encourage the continued operation of agricultural lands in and around Windsor.

Environmental Resources Element Goals and Policies

Goal ER-2: Agricultural Lands. Encourage the ongoing use of land for productive agriculture.

> **Policy ER-2.1 *Agricultural Lands*.** The Town shall encourage the County to limit use of State-designated important farmlands and prime soils outside the Urban Growth Boundary to agriculturally-based activities in recognition that prime agricultural land (defined as Class I and II soils by the U.S. Soil Conservation Service) is an irreplaceable natural resource.
>
> **Policy ER-2.4 *Agricultural Open Space Preservation*.** The Town shall support and advocate efforts by the Sonoma County Agricultural Preservation and Open Space District, the Sonoma Land Trust and other public agencies or public-benefit organizations to acquire easements to preserve non-urban lands for open space and agriculture in areas surrounding the Town's General Plan Area.

Economic Development Element Goals and Policies

Goal ED-1: Business Attraction, Retention, and Expansion. Increase the tax base and create more local job opportunities through business attraction, retention, and expansion.

Policy ED-1.6. *Target Industries*. The Town shall proactively work to expand the following target industries in Windsor: innovative technology; high-end product development and manufacturing; green services and construction; agriculture, including food, wine, and craft beer/spirts; retail/commercial; and tourism.

Goal ED-3: Tourism. Ensure Windsor's long-term success and economic sustainability by diversifying and expanding tourism attractions, highlighting the unique history and character of the Town.

Policy ED-3.9 *Agritourism*. The Town should promote local agriculture and farms, their methods, and the agricultural heritage that exists in Windsor.

Policy ED-3.10. *Commitment to Agriculture*. The Town shall encourage tourism attractions that highlight the agricultural heritage of Windsor and the community's commitment to sustainable agriculture.

The 2040 General Plan would preserve agricultural land surrounding the Town through Policy ER-2.1 to limit the use of farmlands to agricultural activity and Policy ER-2.4 to work with other local agencies to protect farmland. In addition, Policies ED-1.6, ED-3.9, and ED-3.10 would preserve agriculture to expand the agritourism industry. However, implementation of the goals and policies of the 2040 General Plan listed above would not ensure the preservation of all agricultural land in the General Plan Area.

The Town's UGB functions as a planning tool to regulate growth in the region. The UBG prevents growth outside of the Town limits boundary to prevent urban sprawl, which would impact existing agriculture outside of the General Plan Area. Urbanization is concentrated in the UGB preventing agricultural conflicts and loss of agricultural production outside of the UGB. However, as discussed above, compared to existing conditions, land under existing agricultural production within the UGB may be converted to non-agriculture uses as a result of development and buildout associated with the 2040 General Plan.

The 2015 General Plan EIR concluded that because the land use changes would convert existing agricultural production in the Town's Sphere of Influence, agricultural impacts would be significant and unavoidable. The 2040 General Plan would have similar impacts because full buildout through the year 2040 would result in conversion of existing agricultural uses in the General Plan Area to non-agricultural uses. Impacts would be potentially significant.

Mitigation Measures

The following measures are examples that could be used to attempt to reduce potential 2040 General Plan impacts from the conversion of Farmland:

- Granting perpetual conservation easement(s), deed restriction(s), or other farmland conservation mechanism(s) to the qualifying entity which has been approved by the Town to account for any farmland that is converted to non-agricultural uses.
- Making an in-lieu fee payment to a qualifying entity to be applied toward the future purchase of farmland to mitigate for the losses related to farmland, together with an endowment amount as may be required.
- Making an in-lieu payment to a qualifying entity to be applied toward a future perpetual conservation easement, deed restriction, or other farmland conservation mechanisms to preserve farmland in the Town.

- Establishing a Town agricultural mitigation fund for the payment of in-lieu fees.
- Extension of the Urban Growth Boundary for 30 to 50 years.

The measures listed above would serve to preserve existing agricultural land, but would not create new agricultural lands to mitigate for agricultural land lost as a result of development under the 2040 General Plan. Even if the Town were to implement these measures, existing Farmland in the General Plan Area would still be converted to non-agricultural use. Therefore, these measures are not feasible because they would not reduce or avoid the impact associated with conversion of Farmland to non-agricultural uses.

Significance After Mitigation

There are no mitigation measures available to prevent the loss of Farmland within the General Plan Area. Impacts would be significant and unavoidable.

Threshold:	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.

IMPACT AG-2 THE GENERAL PLAN UPDATE WOULD ALTER THE CURRENT LAND USE PATTERN IN PORTIONS OF THE TOWN, INCLUDING IN THE SOUTHERN, NORTHWESTERN, AND EASTERN EDGES OF THE GENERAL PLAN AREA, AND MAY RESULT IN INCOMPATIBILITIES WHERE URBAN AND AGRICULTURAL USES WOULD DIRECTLY ABUT EACH OTHER. HOWEVER, LAND USE CONFLICTS WOULD BE REDUCED THROUGH PROPOSED LAND BUFFERS AND 2040 GENERAL PLAN POLICIES. THEREFORE, IMPACTS THAT WOULD OCCUR FROM THE PROXIMITY OF AGRICULTURAL LAND TO URBAN USES WOULD BE LESS THAN SIGNIFICANT.

Residential development adjacent to agricultural land can have several negative impacts on the continuation of agricultural activities. For example, clearing and grading activities during construction could create excessive dust that could temporarily affect agricultural productivity (see Section 4.3, *Air Quality*). However, the emission of dust particulates during construction activity would be reduced by implementation of best management practices in Mitigation Measure AQ-1, which include watering of exposed soils as needed; enclosure, covering, or watering of exposed piles of construction debris; limiting vehicle speeds on-site; and securely covering all loads on haul/dump trucks.

The placement of residences adjacent to cultivated agriculture can have adverse economic impacts. Increased regulations and liability insurance to protect the farmer from adjacent urban uses cost time and money. Some farmers whose operations may be sensitive to nearby residences voluntarily limit their hours of operation and do not intensively use the portions of their property closest to urban uses, in effect establishing informal buffer zones on their own property. This has the effect of lowering crop yields, which can potentially affect the long-term economic viability of the agricultural operation. This could ultimately cause the loss of agricultural production due to cessation of operations if the economic impacts become severe enough.

Those residing adjacent to agricultural land commonly cite odor nuisance impacts, noise from equipment, dust, and pesticide spraying as typical land use conflicts. Pesticide use on nearby crops and the suspension of dust from operation of equipment and earth-moving activities could create health concerns for residents. Additionally, odors from fertilizers, herbicides, pesticides, and equipment exhaust can be incompatible with residential uses.

Residential development next to agricultural uses could expose these urbanized uses to the above referenced issues and also result in reduced property values along the interface with agricultural uses. In turn, these potential incompatibilities can result in the generation of nuisance complaints, which can in turn adversely affect agricultural resources. The Agricultural Preservation Ordinance (Chapter 27.24.030 [Disclosure]) of the Zoning Ordinance) adopted by the Town of Windsor would help to reduce land use conflicts with agriculture by requiring subdivision maps and new building permits to disclose nearby agriculture uses. Under the ordinance, purchasers of subdivided property near agricultural areas and purchasers of new buildings for human occupancy are informed about the possible negative impacts of residing near normal farm operations (e.g., pesticide use, dust, and noise) by notation on the subdivision map or a statement accompanying the building permit. The ordinance is intended to protect existing farming operations from pressure to cease or curtail operations when residential development occurs nearby.

The existing agricultural industries located within and adjacent to the General Plan Area are a major contributor to the County's economy. To protect the viability of this industry the 2040 General Plan aims to minimize land use conflicts with agriculture. Although the majority of parcels in the Town limits with residential land use designations are currently developed, future residential development on any undeveloped or redeveloped parcels in the east, south, and northwest edges of the General Plan Area could result in the addition of residences adjacent to remaining agricultural land on the outskirts of community. However, development under the 2040 General Plan within the Town limits would establish a more defined community edge providing a sense of transition between farmland on the Town's edge and development within the Town. In addition, the 2040 General Plan Update locates more intensive residential uses away from agricultural land. The residential land uses permitted adjacent to agriculture would be low density land uses including: rural residential, estate residential, and very low density residential.

By design, the 2040 General Plan would focus future development in underdeveloped areas and prioritize infill development where there is sufficient infrastructure capacity and public services. One of the Guiding Principles of the 2040 General Plan is to have agricultural farming practices and urban uses exist harmoniously with conflicts limited through buffers at the Town's edge. However, several areas specified in the 2040 General Plan would involve annexation and development outside of the Town limits, but within the General Plan Area, allowing development of sensitive land uses adjacent to agricultural operations. The Shiloh Road Vision Plan was adopted in 2001, but is revisited in the 2040 General Plan with specific policies to review the plan and annex the area prior to development. Proposed land uses in the Shiloh Road East area include mixed-use development with hotels and high density housing. The Shiloh Road East area is surrounded by agricultural land uses to the south and east. Therefore, development of the Shiloh Road East Vision Plan could place sensitive receptors near agricultural land uses. The North Arata Lane Area identified in the 2040 General Plan is within the General Plan Area and the vision for the area is development as a traditional neighborhood. Existing agriculture surrounds the Arata Lane Area to the north and east, potentially exposing new residents to land use conflicts. The Eastern Edge Area identified in the 2040 General Plan currently contains and is adjacent to agricultural land uses. This area is envisioned to be converted to residential uses. Conversion of this area would reduce the exposure of existing adjacent residences located north, west and south of the area to potential land use conflicts, but could also potentially expose new residents to land use conflicts related to agricultural uses occurring to the east.

The Environmental Resources Element of the 2040 General Plan is designed to encourage the continued operation of agricultural lands in and around Windsor. The goals and policies listed below

from the 2040 General Plan would reduce impacts from conflict between agricultural and non-agricultural land uses.

Environmental Resources Element Policies

Policy ER-2.2 *Agricultural Buffers*. Proposed new development that would be adjacent to existing agricultural properties should include buffers onsite to protect the continued viability of the neighboring agriculture and to minimize adverse effects of agricultural operations. If the existing agricultural property lies outside the Urban Growth Boundary, then the onsite buffer should be permanent and composed of predominantly native and low water-using species, or other appropriate perimeter screening should be required. The Town should allow and encourage the productive use of buffers for appropriate uses, where legally permissible, such as bike trails, rather than requiring buffers to be idle open space. The size of the buffer will be determined by parcel specific review for all new development adjacent to agricultural property. If however, the existing agricultural property lies inside the Urban Growth Boundary and is anticipated to be converted to another non-agricultural use designation according to the General Plan, then the buffer would be temporary. When the interim agricultural area is converted to the non-agricultural use designation, the intermediate buffer area may convert to its underlying land use designation.

Policy ER-2.3 *Disclosure of Agricultural Activity*. The Town shall continue to require that new development adjacent to commercial and agricultural uses be informed of the routine practices and operations that are associated with agriculture. Avoiding any nuisances or impacts resulting from the agricultural activities should be the responsibility of the new, proposed development.

The policies to install buffers between new development and adjacent agricultural land would minimize potential land use conflicts. In addition, Policy ER-2.3 would continue to require disclosure of agricultural activity to notify people of agricultural uses nearby new development. Finally, the Agricultural Preservation Ordinance (Chapter 27.24.030) was adopted to reduce nuisance complaints about farm operations from residential neighbors by requiring disclosure of nearby agriculture uses. Agricultural buffers, disclosure of agricultural activity, and low density development and would reduce potential agricultural/urban conflicts and impacts would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.3 Air Quality

This section analyzes the effects of the 2040 General Plan on air quality emissions and the associated impacts. This section analyzes both temporary air quality impacts relating to construction activity and possible long-term air quality impacts associated with General Plan buildout. The analysis herein is based partially on the traffic modeling and analysis prepared by Sonoma County Transportation Authority and W-Trans (June 2017). Greenhouse gas emissions and global climate change impacts are discussed in Section 4.7, *Greenhouse Gas Emissions*.

4.3.1 Setting

Regional Climate and Meteorology

Windsor is in Sonoma County, and the majority of the Town is located in the San Francisco Bay Area Air Basin (SFBAAB), while the northwest tip of the Town is within the North Coast Air Basin (NCAB). The climate of Windsor is of the semi-arid Mediterranean type, characterized by dry, mild summers and moderately moist, cool winters. Over 90 percent of the rainfall occurs between October and May. Average summer temperatures are in the 70s (degrees Fahrenheit) with highs in the upper 80s. Average temperatures in the winter are in the 50s. Temperature variations between night and day tend to be relatively large during summer with a difference of up to 35 degrees and limited during winter with an average difference of 19 degrees. Precipitation generally occurs between November and March and the average rainfall is approximately 40 inches per year (Bay Area Air Quality Management District [BAAQMD] 2017a).

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

Pollutants

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere. Primary criteria pollutants include carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxides (NO_X), fine particulate matter (PM_{10} and $PM_{2.5}$), sulfur dioxide (SO_2), and lead (Pb). Secondary criteria pollutants are created by atmospheric chemical and photochemical reactions; reactive organic gases (ROG) together with nitrogen oxides form the building blocks for the creation of photochemical (secondary) pollutants. Secondary pollutants include oxidants, ozone (O_3) and sulfate and nitrate particulates (smog). The characteristics, sources and effects of critical air contaminants are described below.

Ozone

O_3 is produced by a photochemical reaction (triggered by sunlight) between NO_X and ROG. Nitrogen oxides are formed during the combustion of fuels, while reactive organic compounds are formed during combustion and evaporation of organic solvents. Because O_3 requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. O_3 is a pungent, colorless, toxic gas with direct health effects on humans including respiratory and eye irritation and possible changes in lung functions. Groups most sensitive to O_3 include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

CO is a local pollutant that is found in high concentrations only near the source. The major source of CO, a colorless, odorless, poisonous gas, is automobile traffic. Elevated concentrations, therefore, are usually only found near areas of high traffic volumes. CO's health effects are related to its affinity for hemoglobin in the blood. At high concentrations, CO reduces the amount of oxygen in the blood, causing heart difficulties in people with chronic diseases, reduced lung capacity and impaired mental abilities.

Nitrogen Dioxide

Nitrogen dioxide (NO_2) is a by-product of fuel combustion, with the primary source being motor vehicles and industrial boilers and furnaces. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. Nitrogen dioxide is an acute irritant. A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 ppm may occur. Nitrogen dioxide absorbs blue light and causes a reddish brown cast to the atmosphere and reduced visibility. It can also contribute to the formation of PM_{10} and acid rain.

Suspended Particulates

PM_{10} is particulate matter measuring no more than 10 microns in diameter, while $PM_{2.5}$ is fine particulate matter measuring no more than 2.5 microns in diameter. Suspended particulates are mostly dust particles, nitrates and sulfates. Both PM_{10} and $PM_{2.5}$ are by-products of fuel combustion and wind erosion of soil and unpaved roads, and are directly emitted into the atmosphere through these processes. Suspended particulates are also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with the small particulates (those between 2.5 and 10 microns in diameter) and fine particulates ($PM_{2.5}$) can be very different. The small particulates generally come from windblown dust and dust kicked up from mobile sources. The fine particulates are generally associated with combustion processes, as well as being formed in the atmosphere as a secondary pollutant through chemical reactions. Fine particulate matter is more likely to penetrate deeply into the lungs and poses a health threat to all groups, but particularly to the elderly, children, and those with respiratory problems. More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance.

Air Pollution Regulation

The federal and state governments have authority under the federal and state Clean Air Acts to regulate emissions of airborne pollutants and have established ambient air quality standards (AAQS) for the protection of public health. The U.S. Environmental Protection Agency (U.S. EPA) is the federal agency designated to administer air quality regulation, while the California Air Resources Board (CARB) is the state equivalent in California. Federal and state standards have been established for six criteria pollutants, including O_3, CO, NO_2, SO_2, PM_{10} and $PM_{2.5}$, and Pb.

Air quality monitoring stations measure pollutant ground-level concentrations (typically, ten feet above ground level). Depending on whether the standards are met or exceeded, the local air basin is classified as in "attainment" or "non-attainment." Some areas are unclassified, which means no monitoring data are available. Unclassified areas are considered to be in attainment. Table 9 lists the current federal and state standards for each of these pollutants as well as the attainment status of the SFBAAB. California air quality standards are identical to or stricter than federal standards for all criteria pollutants.

Table 9 Federal and State Ambient Air Quality Standards

		California Standards		National Standards	
Pollutant	**Averaging Time**	**Concentration**	**Attainment Status**	**Concentration**	**Attainment Status**
Ozone	8 Hour	0.070 ppm	N	0.070 ppm	N
	1 Hour	0.09 ppm	N		
Carbon Monoxide	8 Hour	9.0 ppm	A	9 ppm	A
	1 Hour	20 ppm	A	35 ppm	A
Nitrogen Dioxide	1 Hour	0.18 ppm	A	0.100 ppm	U
	Annual Arithmetic Mean	0.030 ppm		0.053 ppm	A
Sulfur Dioxide	24 Hour	0.04 ppm	A	0.14 ppm	A
	1 Hour	0.25 ppm	A	0.075 ppm	A
	Annual Arithmetic Mean			0.030 ppm	A
Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 $\mu g/m^3$	N		
	24 Hour	50 $\mu g/m^3$	N	150 $\mu g/m^3$	U
Particulate Matter - Fine ($PM_{2.5}$)	Annual Arithmetic Mean	12 $\mu g/m^3$	N	12 $\mu g/m^3$	U/A
	24 Hour			35 $\mu g/m^3$	N
Sulfates	24 Hour	25 $\mu g/m^3$	A		
Lead	Calendar Quarter			1.5 $\mu g/m^3$	A
	Rolling 3 Month Average			0.15 $\mu g/m^3$	
	30 Day Average	1.5 $\mu g/m^3$)			A
Hydrogen Sulfide	1 Hour	0.03 ppm	U		
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm	No information available		
Visibility Reducing particles	8 Hour(10:00 to 18:00 PST)		U		

A=Attainment N=Nonattainment U=Unclassified; mg/m^3=milligrams per cubic meter ppm=parts per million $\mu g/m^3$=micrograms per cubic meter

Source: BAAQMD 2017, http://www.baaqmd.gov/research-and-data/air-quality-standards-and-attainment-status

Local control in air quality management is provided by the ARB through county-level or regional (multi-county) Air Pollution Control Districts (APCDs). The ARB establishes statewide air quality standards and is responsible for control of mobile emission sources, while the local APCDs are responsible for enforcing standards and regulating stationary sources. The ARB has established 15 air basins statewide. The Town of Windsor is located in Sonoma County, which is under the jurisdiction of both the Bay Area Air Quality Management District (BAAQMD) and Northern Sonoma County Air Pollution Control District (NSCAPCD).

Current Air Quality

CARB and the U.S. EPA established ambient air quality standards for major pollutants, including O_3, CO, NO_2, SO_2, Pb, and PM_{10} and $PM_{2.5}$. Standards have been set at levels intended to be protective of public health. California standards are more restrictive than federal standards for each of these pollutants except for lead and the eight-hour average for CO. The local APCDs and Air Quality Management Districts (AQMDs) are required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards.

The majority of the Town of Windsor is located within the Basin under the jurisdiction of BAAQMD. As the local air quality management agency, the BAAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. Although the northwest tip of the Town is located within the NCAB, which is under the jurisdiction of the NSCAPCD, the Town of Windsor is considered a community within BAAQMD (County of Sonoma 2016). CARB has ruled that the NSCAPCD is a downwind receptor of ozone transported from the Bay Area and recommends BAAQMD guidelines (City of Healdsburg 2009).

Air quality data from three monitoring stations in Sonoma County closest to Windsor are summarized in Table 10. Due to data availability, Healdsburg-Municipal Airport Monitoring Station approximately 10 miles north of Windsor was used for ozone, Healdsburg-133 Matheson Street Monitoring Station approximately five miles north of Windsor was used for PM_{10}, and Sebastapol-103 Morris Street Monitoring Station approximately eight miles south of Windsor was used for $PM_{2.5}$. PM_{10} was the only pollutant to exceed thresholds.

Table 10 Ambient Air Quality Data

Pollutant	2014	2015	2016
Ozone (ppm), Worst 1-Hour	0.070	0.072	0.072
Number of days of State exceedances (>0.09 ppm)	0	0	0
Ozone (ppm), 8-Hour Average	0.064	0.063	0.066
Number of days of State exceedances (>0.07 ppm)	0	0	0
Number of days of Federal exceedances (>0.07 ppm)	0	0	0
Carbon Monoxide (ppm), Highest 8-Hour Average	*	*	*
Number of days of above State or Federal standard (>9.0 ppm)	*	*	*
Particulate Matter <10 microns, μg/m^3, Worst 24 Hours	42.9	50.2	42.2
Number of days above State standard (>50 μg/m^3)	0	1	0
Number of days above Federal standard (>150 μg/m^3)	0	0	0
Particulate Matter <2.5 microns, μg/m^3, Worst 24 Hours	26.2	29.9	18.7
Number of days above Federal standard (>35 μg/m^3)	0	0	0

ppm = parts per million; μg/m^3 = micrograms per cubic meter

* There was insufficient (or no) data available to determine the value.

Healdsburg-Municipal Monitoring Station was used for ozone, Healdsburg-133 Matheson Street Monitoring Station was used for PM_{10}, Santa Rose-5th Street Monitoring Station was used for 2013 $PM_{2.5}$, and Sebastapol-103 Morris Street Monitoring Station was used for 2014 and 2015 $PM_{2.5}$.

Source: CARB Top 4 Summary https://www.arb.ca.gov/adam/topfour/topfour1.php

Regulatory Setting

The Federal Clean Air Act governs air quality in the United States. In addition to being subject to federal requirements, air quality in California is also governed by more stringent regulations under the California Clean Air Act. At the federal level, the U.S. EPA administers the Clean Air Act (CAA). The CAA is administered by the CARB at the State level and by the AQMDs at the regional and local levels. The BAAQMD regulates air quality at the regional level, which includes the nine-county Bay Area.

Federal

The U.S. EPA is responsible for enforcing the federal CAA. The U.S. EPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). The NAAQS are required under the 1977 CAA and subsequent amendments. The EPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. The agency has jurisdiction over emission sources outside state waters (e.g. beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission standards established by the CARB.

State

In California, the CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the State requirements of the federal CAA, administering the California CAA, and establishing the California Ambient Air Quality Standards (CAAQS). The

California CAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. The CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride and visibility reducing particles. The CARB regulates mobile air pollution sources, such as motor vehicles. The agency is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. The CARB established passenger vehicle fuel specifications, which became effective on March 1996. The CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county level.

Regional

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

The BAAQMD adopted the 2017 Clean Air Plan (2017 CAP) on April 19, 2017 as an update to the 2010 Clean Air Plan. The 2017 CAP, which focuses on protecting public health and the climate, defines an integrated, multi-pollutant control strategy that includes all feasible measures to reduce emissions of ozone precursors (including transport of ozone and its precursors to neighboring air basins), PM, and toxic air contaminants (TACs). To protect public health, the control strategy will decrease population exposure to PM and TACs in communities that are most impacted by air pollution with the goal of eliminating disparities in exposure to air pollution between communities. The control strategy will protect the climate by reducing GHG emissions and developing a long-range vision of how the Bay Area could look and function in a year 2050 post-carbon economy (BAAQMD 2017b).

Sensitive Receptors in the General Plan Area

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare. They are designed to protect that segment of the public most susceptible to respiratory distress, such as children under 14, the elderly over 65, persons engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. The majority of sensitive receptor locations are therefore residences, schools, and hospitals. Sensitive receptors are located throughout the Town of Windsor.

The BAAQMD recommends that general plans include buffer zones to separate sensitive receptors from sources of air toxic contaminants and odors. In April 2005, the CARB released the final version of the *Air Quality and Land Use Handbook*, which is intended to encourage local land use agencies to consider the risks from air pollution prior to making decisions that approve the siting of new sensitive receptors (e.g. homes or daycare centers) near sources of air pollution. Unlike industrial or stationary sources of air pollution, siting of new sensitive receptors does not require air quality permits, but could create air quality problems. The primary purpose of the handbook is to highlight the potential health impacts associated with proximity to common air pollution sources, so that those issues are considered in the planning process. CARB makes recommendations regarding the

siting of new sensitive land uses near freeways, truck distribution centers, dry cleaners, gasoline dispensing stations, and other air pollution sources. These recommendations are based primarily on modeling information and may not be entirely reflective of conditions in the General Plan Area. The *Air Quality and Land Use Handbook* notes that siting of new sensitive land uses within these distances may be possible, but recommends that site-specific studies be conducted to identify actual health risks. CARB acknowledges that land use agencies have to balance other siting considerations such as housing and transportation needs, economic development priorities and other quality of life issues.

4.3.2 Impact Analysis

Methodology and Significance Thresholds

This analysis uses the BAAQMD's May 2017 *CEQA Air Quality Guidelines* to evaluate air quality. The plan-level thresholds specified in the May 2017 BAAQMD *CEQA Air Quality Guidelines* were used for this analysis to determine whether the impacts of the 2040 General Plan exceed the thresholds identified in Appendix G of the *State CEQA Guidelines.*

Significance Thresholds

Based on Appendix G of the State CEQA Guidelines a project may be deemed to have a significant impact on air quality if it would:

1. Conflict with or obstruct the implementation of the regional air quality management plan
2. Violate any air quality standard or contribute substantially to an existing or projected air quality violation
3. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)
4. Expose sensitive receptors to substantial pollutant concentrations
5. Create objectionable odors affecting a substantial number of people

Short-Term Emissions Thresholds

The BAAQMD's 2017 CEQA Air Quality Guidelines have no plan-level significance thresholds for construction air pollutants emissions. However, they do include the individual project-level thresholds for temporary construction-related and long-term operational emissions of air pollutants. These thresholds represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the Basin's existing air quality conditions (BAAQMD 2017a). However, short-term emissions associated with the 2040 General Plan are discussed qualitatively to evaluate potential air quality impacts.

Long-Term Emissions Thresholds

The BAAQMD's 2017 CEQA Air Quality Guidelines contain specific operational plan-level significance thresholds for criteria air pollutants. Plans must show the following over the planning period:

- Consistency with current air quality plan control measures

- Vehicle miles traveled (VMT) or vehicle trips (VT) increase is less than or equal to the plans projected population increase

If a plan can demonstrate consistency with both of these criteria then impacts are considered less than significant.

Methodology for Estimating Emissions

Short-Term Emissions

Construction-related emissions are generally short-term in duration, but may still cause adverse air quality impacts. Construction of development proposed in the 2040 General Plan would generate temporary emissions from three primary sources: the operation of construction vehicles (e.g., scrapers, loaders, dump trucks, etc.); ground disturbance during site preparation and grading, which creates fugitive dust; and the application of asphalt, paint, or other oil-based substances.

Development associated with implementation of the 2040 General Plan would result in temporary construction-related and long-term operational emissions. At this time, the majority of 2040 General Plan projects are not defined to a level that would allow project-level analysis and thus it would be speculative to include project-level impacts as part of this analysis. Rather, impacts for the 2040 General Plan as a whole are discussed qualitatively and emissions are not compared to the project-level thresholds.

Long-Term Emissions

Per plan-level guidance from the BAAQMD 2017 *CEQA Air Quality Guidelines,* long-term operational emissions associated with implementation of the 2040 General Plan are discussed qualitatively using a comparison of the 2040 General Plan to the 2017 Clean Air Plan goals, polices, and control measures. In addition, a comparison of rate and increase and population is recommended by BAAQMD for determining significance of criteria pollutants. If the 2040 General Plan does not meet either criterion then impacts would be potentially significant.

Project Impacts

Threshold:	Violate any air quality standard or contribute substantially to an existing or projected air quality violation or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard, including releasing emissions, which exceed quantitative thresholds for ozone precursors.

IMPACT AQ-1 BUILDOUT OF THE 2040 GENERAL PLAN WOULD RESULT IN THE TEMPORARY GENERATION OF AIR POLLUTANTS DURING CONSTRUCTION, WHICH WOULD AFFECT LOCAL AIR QUALITY. ~~MODIFICATION~~ IMPLEMENTATION OF MITIGATION ~~2040 GENERAL PLAN POLICY ER-4.3~~ TO INCLUDE THE BAAQMD BASIC CONSTRUCTION MITIGATION MEASURES WOULD REQUIRE FUTURE PROJECTS WITHIN THE GENERAL PLAN AREA TO IMPLEMENT MEASURES TO REDUCE CONSTRUCTION EMISSIONS. IMPACTS WOULD BE SIGNIFICANT BUT MITIGABLE.

Future development under the 2040 General Plan may involve activities that result in air pollutant emissions. Construction activities such as demolition, grading, construction worker travel to and from project sites, delivery and hauling of construction supplies and debris to and from project sites, and fuel combustion by on-site construction equipment would generate pollutant emissions. These

construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants, particularly during site preparation and grading. The extent of daily emissions, particularly ROGs and NO_X emissions, generated by construction equipment, would depend on the quantity of equipment used and the hours of operation for each project. The extent of $PM_{2.5}$ and PM_{10} emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting excavated materials offsite is necessary. Dust emissions can lead to both nuisance and health impacts. According to the 2017 BAAQMD *CEQA Air Quality Guidelines,* during construction PM_{10} is the greatest pollutant of concern.

As discussed above, BAAQMD's 2017 *CEQA Air Quality Guidelines* have no plan-level significance thresholds for construction air pollutant emissions. However, the guidelines include project-level thresholds for construction emissions. If a project's construction emissions fall below the project-level thresholds, the project's impacts to regional air quality are considered individually and cumulatively less than significant. The BAAQMD has also identified feasible fugitive dust control measures for construction activities. These Basic Construction Mitigation measures are recommended for all projects (BAAQMD 2017a). In addition, the BAAQMD and CARB have regulations that address the handling of hazardous air pollutants such as lead and asbestos. Lead and asbestos emissions could occur from demolition activities. BAAQMD rules and regulations address both the handling and transport of these contaminants. Construction associated with development of projects under the 2040 General Plan would temporarily increase air pollutant emissions, possibly creating localized areas of unhealthy air pollution levels or air quality nuisances.

However, the Environmental Resources Element of the 2040 General Plan includes goals and policies that would reduce short-term emissions of criteria air pollutants associated with future development under the 2040 General Plan. Specific goals and policies are listed below.

Environmental Resources Element Goals and Policies

Goal ER-4: Comply with State and federal ambient air quality standards and participate in regional efforts to improve air quality.

> **Policy ER-4.1** ***Maintain Ambient Air Quality Standards*****.** The Town shall coordinate with the Bay Area Air Quality Management District (BAAQMD), the Northern Sonoma County Air Pollution Control District (NSCAPCD), and the California Air Resources Board (ARB) to meet State and national ambient air quality standards in order to protect all residents, regardless of geographic location, from the health effects of air pollution.
>
> **Policy ER-4.2** ***Development Review of Air Quality*****.** The Town shall require, through discretionary authority, that development proposals comply with Federal and State air quality standards, or make findings that the project has overriding benefits to the community that outweigh nonattainment of the standards. If the development proposal is found to cause significant impacts, the Town may require an air quality study or implementation of mitigation measures.
>
> **Policy ER-4.3** ***Air Quality During Construction and Operations*****.** The Town shall require that development projects incorporate feasible measures that reduce construction and operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$).

The policies listed above would reduce short-term construction emissions associated with buildout of the 2040 General Plan; however, the policies do not require implementation of the recommended BAAQMD Basic Construction Mitigation Measures to reduce fugitive dust emissions.

The BAAQMD has identified feasible fugitive dust control measures for construction activities because PM_{10} is the greatest pollutant of concern (BAAQMD 2017a). Therefore, impacts related to construction emissions are potentially significant and mitigation is required for construction activities associated with the 2040 General Plan.

Mitigation Measures

Temporary construction impacts associated with development envisioned by the General Plan would be reduced through implementation of Mitigation Measure AQ-1.

AQ-1 Construction Emissions Measures

~~Environmental Resources Policy ER-4.3 shall be updated to read:~~ The Town shall require that development projects incorporate the Bay Area Air Quality Management District (BAAQMD) Basic Construction Mitigation Measures to reduce construction emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$). The Town shall require the following to be adhered to during project construction to reduce air quality impacts.

During construction activities:

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, with priority given to the use of recycled water for this activity when feasible.
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 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 visible emissions evaluator.
8. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

The Town shall also require that development projects incorporate feasible measures that reduce operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$).

Significance After Mitigation

Impacts would be less than significant with implementation of Mitigation Measure AQ-1.

Threshold:	Violate any air quality standard or contribute substantially to an existing or projected air quality violation; result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors; expose sensitive receptors to substantial pollutant concentrations; or conflict with or obstruct implementation of the applicable air quality plan.

IMPACT AQ-2 THE 2040 GENERAL PLAN WOULD BE CONSISTENT WITH BAAQMD'S 2017 CLEAN AIR PLAN AND THE RATE OF INCREASE FOR VEHICLE MILES TRAVELED UNDER BUILDOUT OF THE 2040 GENERAL PLAN WOULD NOT EXCEED THE RATE OF PROJECTED POPULATION INCREASE ASSOCIATED WITH THE 2040 GENERAL PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Although the May 2017 *BAAQMD CEQA Air Quality Guidelines* provide no quantitative thresholds for criteria pollutant emissions Table 11 shows the net worst case annual operational emissions associated with buildout of the 2040 General Plan to accommodate 11,067 new residents and 2,860 new jobs. Emissions were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.1. The emissions estimates are provided for informational purposes only because the 2040 General Plan does not propose any specific development projects and the BAAQMD recommends a qualitative discussion for plan-level air quality impacts.

Table 11 Operational Emissions

Pollutant	Maximum Annual Emissions (tons per year)
ROG	51
NO_X	71
CO	123
SO_2	1
PM_{10}	59
$PM_{2.5}$	17

See Appendix B for CalEEMod Annual worksheet.

2040 General Plan Consistency with Current Air Quality Plan

The most recently adopted air quality plan in the San Francisco Bay Area Air Basin is the 2017 Clean Air Plan (CAP). The 2017 CAP is a roadmap showing how the San Francisco Bay Area will achieve compliance with the State one-hour ozone standard as expeditiously as practicable, and how the region will reduce transport of O_3 and O_3 precursors to neighboring air basins. The 2017 CAP does not include control measures that apply directly to individual development projects; instead, the control strategy includes stationary-source control measures to be implemented through the BAAQMD regulations; mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with the Metropolitan Transportation Commission (MTC), local governments, transit agencies, and others. The 2017 CAP also represents the Bay Area's most

recent triennial assessment of the region's strategy to attain the state one-hour ozone standard. In this, the 2017 CAP replaces the 2010 CAP. Under BAAQMD's methodology, a determination of consistency with CEQA Guidelines thresholds should demonstrate that a project:

- Supports the primary goals of the CAP;
- Includes applicable control measures from the CAP; and
- Does not disrupt or hinder implementation of any CAP control measures

Support the Primary Goals of the CAP

The primary goals of the 2017 CAP are to:

- Protect air quality and health at the regional and local scale; and
- Protect the climate.

Any project that would not support these goals would not be considered consistent with the 2017 CAP. On an individual project basis, consistency with BAAQMD quantitative thresholds is interpreted as demonstrating support for the CAP goals. Policies contained in the 2040 General Plan are aimed at reducing vehicle emissions and energy use, which are the two major drivers of criteria air pollutant emissions. The following goals and policies of Land Use and Community Design Element and the Transportation and Mobility Element of the 2040 General Plan are aimed at reducing the air quality impacts associated with population growth in the Town by supporting the Town's Growth Control Ordinance, promoting alternative transportation through land use design, reducing the number of vehicle trips, and reducing energy use:

Land Use and Community Design Element

Goal LU-1: Community Design. Encourage well-designed development that preserves and enhances Windsor's community character.

> **Policy LU-1.6 *Design for Livable Environments*.** The Town shall maintain design standards and create form-based codes or form-based design standards for specific areas that promote walkable and livable environments.

Goal LU-2: Residential Development. Promote the preservation and development of residential neighborhoods that provide a variety of housing types, densities, and designs that address the diverse needs of Windsor residents of all ages and socio-economic groups.

> **Policy LU-2.5 *High-Density Residential Areas*.** The Town shall encourage high-density residential uses to locate in areas close to services and transit.

Goal LU-3: Commercial Development. Promote attractive and vibrant neighborhood, community, and regional commercial centers that provide convenient and enhanced opportunities for shopping, services, entertainment, and social interaction.

> **Policy LU-3.2 ~~*High Density Residnetial Areas*~~ *Connectivity to Neighborhoods*.** The Town shall encourage commercial areas to be linked to adjoining residential neighborhoods by well-designed and attractive streetscapes that have well-designed buildings fronting on tree-lined sidewalks with bicycle paths and street amenities.

Goal LU-4: Mixed-Use Development. Create well-defined nodes of activity containing an integrated mix of commercial, office, and residential uses that enable Windsor residents to live close to businesses and services, reduce automobile use, and actively encourage pedestrian activity.

Policy LU-4.1 ~~*High Density Residential Areas*~~ *Mixed-Use Objectives*. Mixed Use Objectives. Mixed use projects shall comply with the following objectives:

- A blend of uses that are physically and functionally integrated to create a synergy between different uses and a unique sense of place;
- Compact development that reduces reliance on automobiles and promotes transit, walking, and biking;
- Pedestrian-oriented design with active uses built up to the sidewalks;
- A comfortable public realm that encourages community members to gather and socialize;
- Increased economic vitality; and
- Crime prevention and security by providing building facades behind sidewalks that provide eyes on the streets.

Goal LU-8: Growth Control Ordinance. Allow Windsor to grow at a reasonable pace, given infrastructure capacity and the desire to maintain its small town feel, healthy economy, and healthy community, and achieve greenhouse gas emission reduction goals.

Policy LU-8.1 *Maintain Growth Control Ordinance*. The Town shall maintain a Growth Control Ordinance that establishes a rate of residential growth that is a function of the available capacity in the transportation, water, wastewater, and school systems, and is consistent with the Capital Improvement Program.

Policy LU-8.2 *Exemptions for Commercial and Industrial Development.* Given the desirability of developing the Town's economic base and providing jobs for Windsor's residents, the Town shall continue to exempt commercial and industrial development from the annual growth control allocations.

Policy LU-8.3 *Exemptions for Affordable Housing.* The Town shall continue to provide exemptions for affordable and special needs housing from the annual growth control allocations.

Policy LU-8.4 *Exemptions for Priority Infill Areas.* The Town shall continue to provide exemptions for infill development within Town-designated priority infill areas to facilitate development in these areas.

Environmental Resources Element

Goal ER-5: Improve the sustainability and resiliency of Windsor through compliance with local, State, and Federal policies and standards that aim to reduce greenhouse gas (GHG) emissions in the community.

Policy ER-5.8 *Energy Conservation and Efficiency Programs.* The Town shall promote energy conservation/energy efficiency improvement programs for residential and commercial properties such as those offered by Sonoma County Energy Independence Program (SCEIP) and Property Assessed Clean Energy (PACE) that reduce energy demand which contribute to background levels of regional air emissions and GHG emissions.

Policy ER-5.9 ***Energy Conservation through Land Use.*** The Town shall promote the creation of a land use pattern that reduces operational energy requirements, especially for transportation purposes, by:

a. Avoiding land use configurations and siting decisions that result in single-purpose automobile trips, and instead encouraging patterns that result in multi-purpose trips

b. Promoting land use patterns that may be easily served by local transit and linked with regional transit

c. Promoting land use patterns that provide employment opportunities for Windsor residents

Policy ER-5.10 ***Energy Performance Standards.*** The Town shall require new construction to meet targeted energy performance standards to advance Town greenhouse gas reduction and other sustainability goals and policies identified in the General Plan. The Town will allow new development to select from a range of options to achieve a minimum energy performance standard, including but not limited to:

- Solar easements to guarantee access to increased renewable energy generation;
- Installation of EV charging stations in homes and in commercial development to increase the ability for the public to use zero-emission vehicles;
- Passive heating and cooling building design;
- Solar roof and carport panels;
- Cool roofs;
- Smart appliances;
- Wind generation;
- Installation of energy efficient appliances and fixtures; and
- Other emerging technologies as they become available.

Policy ER-5.11 ***Zero Net Energy Goals.*** The Town shall strive to implement the State goal of zero net energy (ZNE) in all new residential construction by 2020 and ZNE in all new commercial construction by 2030.

Policy ER-5.12 ***Retrofitting Existing Buildings.*** The Town shall actively encourage the retrofitting of existing buildings throughout Windsor in order to align those buildings more closely with the Town's energy performance standards.

Policy ER-5.13 ***Update Energy Policies and Programs.*** The town shall regularly update and strengthen Town energy-related policies and programs for new and existing construction to reflect advances in technologies and practices.

Policy ER-5.14 ***Compliance with Energy Regulations.*** The Town shall continue to enforce State energy regulations governing energy consumption and use of solar and other renewable energy resources in existing and new development.

Transportation and Mobility Element

Goal M1: Multimodal Circulation System. Promote the development of an integrated, multimodal transportation system that balances the circulation and mobility needs of pedestrians, bicyclists, public transit, automobiles, and goods movement.

Policy M-1.1 ***Multimodal Transportation System.*** The Town shall continue to implement a multimodal transportation system that connects residents to activity centers throughout and near town, such as commercial centers and corridors, employment centers, the SMART train stop, the airport, schools, parks, recreation areas, and other attractions.

Policy M-1.2 ***Trip Generation Reduction for Applicable Developments.*** The Town shall consider appropriate reductions to the trip generation for projects with a multimodal system approach that increases transit ridership, biking, and walking, in order to reduce air pollution, energy consumption, and greenhouse gas emissions.

Policy M-1.3 ***Development of Pedestrian, Bicycle, and Transit Facilities.*** The Town shall encourage the development of facilities and services (e.g., secure long-term bicycle parking, street lights, street furniture and trees, transit stop benches and shelters, and street sweeping of bike lanes) that enable bicycling, walking, and transit to become more widely used modes of transportation and recreation.

Policy M-1.4 ***Multimodal System Additions.*** The Town shall require all new development that proposes or is required to construct or extend streets to develop a transportation network that complements and contributes to the town's multimodal system, maximizes connections, and minimizes barriers to connectivity.

Goal M2: Complete Streets. Provide "complete streets" with facilities, and amenities that meet the needs of all users, regardless of their age or ability, or whether they are walking, bicycling, taking transit, or driving.

Policy M-2.1 ***Complete Streets Design Guidelines.*** The Town shall ensure that the concepts and design standards/guidelines in the adopted Complete Street Design Guidelines are considered during review of new development proposals, when constructing new streets, and when modifying existing corridors in order to ensure accessibility for all.

Policy M-2.3 ***Managing Transportation in the Right-of-Way.*** The Town shall balance the needs of all travel modes when planning transportation improvements, including pedestrian and bicycle trails and pathways.

Policy M-2.7 ***Complete Street Priority Areas.*** The Town shall prioritize complete streets improvements (e.g., bicycle, pedestrian, vehicle, and transit facilities) at and along U.S. Highway 101 interchanges, including Shiloh Road, Arata Lane, and Central Windsor.

Policy M-2.10 ***Bicycle and Pedestrian Connectivity.*** The Town shall ensure that commercial and residential development, including affordable housing projects, provides convenient and direct connections to the nearest existing bikeways, pedestrian ways, and public transit facilities.

Goal M4: Walkable and Bikeable Community. Provide a safe, efficient, and accessible bicycle and pedestrian system throughout Town.

Policy M-4.2 ***Trail Network.*** The Town shall expand its network of trails throughout the town, wherever feasible, through public open spaces and easements for recreational enjoyment and for a vehicle-free route to parks, schools, and neighborhoods through walled subdivisions.

Policy M-4.3 ***Trail Accessibility.*** The Town shall require trails to be within a short walk of most residents in order to harbor active lifestyles and offer opportunities to appreciate open space.

Policy M-4.4 ***Pedestrian and Bicycling Gaps.*** The Town shall encourage closing the gaps in the sidewalk and bicycling network to ensure continuous pedestrian and cycling access within town, particularly the gaps in connection due to the bisecting of U.S. Highway 101.

Goal M5: Public Transit. Provide opportunities for a reliable and integrated transit system for Windsor residents, visitors, and employees to circulate about Town and connect to the broader region without reliance on the automobile.

Policy M-5.1 ***Transit Oriented Development.*** The Town shall encourage higher density mixed land uses within walking distances of existing and future transit stops.

Policy M-5.2 ***Expansion of Bus Service.*** The Town shall support expansion of local bus service through Sonoma County Transit, consistent with funding resources, to link residences with key local destinations, such as employment centers and the airport, and shall support the continuation of paratransit service to satisfy needs of qualified users.

Policy M-4.4 ***Pedestrian and Bicycling Gaps.*** The Town shall encourage closing the gaps in the sidewalk and bicycling network to ensure continuous pedestrian and cycling access within the town, particularly the gaps in connection due to the bisecting of U.S. Highway 101.

The proposed 2040 General Plan policies above would limit development through reduction in vehicle trips and emissions by providing alternate modes of transportation and reducing energy use in the Town. Development proposed by the General Plan would be designed to promote active transportation in the community, further reducing vehicle emissions. Development in the Town facilitated by the 2040 General Plan would be required to be in compliance with the Town's Growth Control Ordinance limiting development to growth control allocations provided in the ordinance. Limiting growth control and thus development would limit the emissions associated with buildout of the 2040 General Plan. Approval of the 2040 General Plan would not result in significant and unavoidable criteria pollutant emissions or other significant air quality impacts because it would be consistent with the goals of the CAP.

Include Applicable CAP Control Measures

The Bay Area 2017 CAP contains 85 control strategies aimed at reducing air pollution and protecting the climate in the Bay Area. For consistency with climate planning efforts at the state level, the control strategies in the CAP are based on the same economic sector framework used by CARB, which encompass stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Table 12 identifies applicable control measures and correlates the measures to specific elements of the 2040 General Plan.

Table 12 2017 Clean Air Plan Control Measures

Control Measures	Consistency
Transportation	
TR2: Trip Reduction Programs. Implement the regional Commuter Benefits Program (Rule 14-1) that requires employers with 50 or more Bay Area employees to provide commuter benefits. Encourage trip reduction policies and programs in local plans, e.g., general and specific plans while providing grants to support trip reduction efforts. Encourage local governments to require mitigation of vehicle travel as part of new development approval, to adopt transit benefits ordinances in order to reduce transit costs to employees, and to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips. Fund various employer-based trip reduction programs.	**Consistent**: The 2040 General Plan would promote compatible, transit-oriented land uses which would reduce vehicle trips and emissions associated with those trips. Part of the vision for the 2040 General Plan is to provide a safe and walkable environment for residents and visitors and to value mobility and accessibility via walking, biking, and high quality public transit. The 2040 General Plan goals and policies would reduce vehicle trips in the Town. Specifically, Goals M1, M2, M4, and M5 of the Transportation and Mobility Element and related policies, listed above, would promote alternative modes of transportation.
TR9: Bicycle and Pedestrian Access and Facilities. Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	**Consistent**: Policies in the 2040 General Plan support an efficient and safe bicycle and pedestrian system that would improve the connectivity and accessibility throughout the Town and thus reduce vehicle trips and emissions associated with those trips. Transportation and Mobility Element policies M-4.2 through M-4.4 listed above as well as policies included below encourage bicycle and pedestrian facilities. ▪ **M-4.1 Bicycle and Pedestrian Mater Plan**. The Town shall regularly update and implement the Windsor Bicycle and Pedestrian Master Plan. ▪ **M-4.5 Bicycle Infrastructure Planning**. The Town shall consider the needs of bicyclists of all types (commuters, recreational riders, children, and families) in planning, developing, and maintaining a bikeway network that is safe and convenient. ▪ **M-4.7 Bicycle Detection at Intersections**. The Town shall require that all signalized intersections include bicycle detection and are properly marked and operational for use by bicyclists. ▪ **M-4.10 Bicycle Parking**. The Town shall continue to require adequate bicycle parking facilities at schools, parks, shopping centers, and places of employment in both commercial and industrial areas.
TR13: Parking Policies. Encourage parking policies and programs in local plans, e.g., reduce minimum parking requirements; limit the supply of off-street parking in transit-oriented areas; unbundle the price of parking spaces; support implementation of demand-based pricing (such as “SF Park”) in high-traffic areas.	**Consistent**: 2040 General Plan Transportation and Mobility Element policies would provide additional parking to accommodate proposed growth. Specifically Policy M-6.1 to provide adequate Town parking and Policy M-6.4 to encourage developers and employers to offer programs to reduce parking demand, such as transit passes or other transit enhancements. Additional, 2040 General Plan Transportation and Mobility Element Policies M-4.10 and M-4.11 would provide additional bicycle parking to reduce the need for vehicle use.

Control Measures	Consistency
Energy	
EN2: Decrease Electricity Demand. Work with local governments to adopt additional energy-efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.	**Consistent**: Part of the Sustainability and Resilience guiding principle for the 2040 General Plan is to promote energy efficiency and the use of renewable energy which would reduce air quality emissions associated with energy use (such as for the production of electricity or combustion of natural gas). The following Public Facilities and Services Element and Environmental Resources Element policies would reduce energy in the Town: **PFS-1.5 Sustainable Practices**. The Town shall serve as a role model to businesses and institutions regarding purchasing decisions that minimize the generation of waste, recycling programs that reduce waste, energy efficiency and conservation practices that reduce water, electricity and natural gas use, and fleet operations that reduce gasoline consumption. **PFS-1.6 Energy Efficient Buildings and Infrastructure**. The Town shall continue to improve energy efficiency of Town buildings and infrastructure through efficiency improvements, equipment upgrades, and installation of clean, renewable energy systems to achieve climate action goals and reduce operating costs. **ER-5.8 Energy Conservation and Efficiency Programs**. The Town shall promote energy conservation/energy efficiency improvement programs for residential and commercial properties such as those offered by Sonoma County Energy Independence Program (SCEIP) and Property Assessed Clean Energy (PACE) that reduce energy demand which contribute to background levels of regional air emissions and GHG emissions. **ER-5.9 Energy Conservation through Land Use**. The Town shall promote the creation of a land use pattern that reduces operational energy requirements, especially for transportation purposes, by: Avoiding land use configurations and siting decisions that result in single-purpose automobile trips, and instead encouraging patterns that result in multi-purpose trips. Promoting land use patterns that may be easily served by local transit and linked with regional transit. Promoting land use patterns that provide employment opportunities for Windsor residents. **ER-5.10 Energy Performance Standards**. The Town shall require new construction to meet targeted energy performance standards to advance Town greenhouse gas reduction and other sustainability goals and policies identified in the General Plan and the 2020 Regional Climate Action Plan. The Town will allow new development to select from a range of options to achieve a minimum energy performance standard, including but not limited to: One of the objectives of the Specific Plan is to create a sustainable urban environment including incorporating green building features, green infrastructure and ecology, and sustainable energy systems. The Specific Plan includes the following building performance standards that would conserve energy: ▪ CalGreen development; ▪ LEED neighborhood development certification for new development over five aces in size; ▪ Solar ready buildings; and

Control Measures	Consistency
	▪ Sustainable roofs for new construction, additions, and alterations. Under State law, development under the 2040 General Plan would be required to comply with all energy standards of Title 24 that are in effect at the time of development. The 2016 Title 24 standards are approximately 28% more efficient than the 2013 standards. The 2013 Title 24 standards are approximately 30% more efficient than the 2008 standards, which in turn are approximately 15% more efficient than the 2005 standards.
Buildings	
BL1: Green Buildings. Collaborate with partners such as KyotoUSA to identify energy-related improvements and opportunities for on-site renewable energy systems in school districts; investigate funding strategies to implement upgrades. Identify barriers to effective local implementation of the CALGreen (Title 24) statewide building energy code; develop solutions to improve implementation/enforcement. Work with ABAG's BayREN program to make additional funding available for energy-related projects in the buildings sector. Engage with additional partners to target reducing emissions from specific types of buildings.	**Consistent**: Implementation of policies in the Public Facilities and Services Element and Environmental Resources Element listed above would promote green building standards. In addition, the 2040 General Plan would be required to comply with all energy standards of Title 24, as part of Policy ER-5.15, that are in effect at the time of development. The 2016 Title 24 standards are approximately 28% more efficient than the 2013 standards. The 2013 Title 24 standards are approximately 30% more efficient than the 2008 standards, which in turn are approximately 15% more efficient than the 2005 standards.
Water Control Measures	
WR2: Support Water Conservation. Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	**Consistent**: Part of the Sustainability and Resilience guiding principle for the 2040 General Plan is to promote water conservation and the use of recycled water. The following Public Facilities and Services Element and Environmental Resources Element policies would support water conservation in the Town: ▪ **PFS-2.1 Water Master Plan**. The Town shall continue to maintain, implement and periodically update the Master Plan to ensure the reliability and efficiency of the Town's water distribution system. ▪ **PFS-2.5 Recycled Water**. The Town shall continue to support the beneficial reuse of recycled water and the joint use of facilities including reservoir, distribution mains, and pumping facilities for the use of recycled water when such joint use benefits the environment. ▪ **PFS-2.6 2020 Water conservation Target**. The Town shall achieve a 20 percent reduction in per-capita water use by 2020 consistent with the State's 20x20x20 Water Conservation Plan. ▪ **PFS-2.7 Water Conservation Enforcement**. The Town shall continue to enforce Town ordinances that prohibit excess water runoff and waste through applicable penalties and fees. ▪ **PFS-2.8 Conservation Efforts**. The Town shall continue to require the use of water-conserving plumbing fixtures, such as low-flow toilets and showerheads, and water-efficient dishwashers and washing machines in all new development. ▪ **ER-3.1 Preservation of Waterways**. Whenever possible, creeks should be conserved in, or restored to, their natural states to carry storm waters, to maintain a natural appearance, and to

Control Measures	Consistency
	protect fisheries. Portions of the channels that have been significantly altered for flood control should still be used for urban open space.

The 2040 General Plan would be consistent with the majority of CAP control measures because the 2040 General Plan would implement similar measures through specific goals and policies that would reduce criteria pollutant emissions. Therefore, the 2040 General Plan would be consistent with the applicable control measures contained in the 2017 CAP for the SFBAAB.

Hinder Implementation of CAP Control Measures

All projects under the 2040 General Plan would be required to be consistent with BAAQMD rules and regulations, including dust and diesel particulate matter reduction measures and would not otherwise cause the disruption, delay or otherwise hinder the implementation of any air quality plan control measure. Table 12 shows that the 2040 General Plan would not disrupt or hinder implementation of any CAP control measures. Buildout of the 2040 General Plan would not preclude any planned transit or bike pathways, and would not otherwise disrupt regional planning efforts to reduce VMT and meet federal and State air quality standards. Therefore the 2040 General Plan would not hinder implementation of any CAP control measures.

General Plan VMT and Population

According to the BAAQMD 2017 *CEQA Air Quality Guidelines,* the threshold for criteria air pollutants and precursors includes an assessment of the rate of increase of plan VMT and population. The 2040 General Plan would increase VMT in the year 2040 by 148,314 miles daily, which is a one percent increase compared to existing conditions (13,890,347 daily VMT) (SCTA 2017). The 2040 General Plan is projected to increase population by 11,067 residents through the year 2040, see Section 4.12, *Population and Housing*. Compared to the existing population in the General Plan Area of 27,371, the 2040 General Plan would increase population by approximately 40 percent. Therefore, the rate of increase of proposed VMT (approximately one percent) from plan buildout would not exceed the rate of increase from the proposed population (approximately 40 percent). Impacts to criteria pollutants would be less than significant.

Mitigation Measure

Impacts would be less than significant; therefore, mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold: Create objectionable odors affecting a substantial number of people.

IMPACT AQ-3 THE 2040 GENERAL PLAN WOULD NOT CREATE OBJECTIONABLE ODORS THAT WOULD AFFECT NEIGHBORING PROPERTIES. IMPACTS RELATED TO ODORS WOULD BE LESS THAN SIGNIFICANT.

Land uses typically producing objectionable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. Buildout of the 2040 General Plan would increase light and heavy industrial land

uses in the Town west of Highway 101 in the southern portion of the General Plan Area. However, new industrial land use would be in an area that is already surrounded by industrial operations and is not adjacent to any residences that would be impacted by odors from industry. As discussed in Section 4.2, Agricultural Resources, agricultural land uses permitted in the General Plan Area would not result in conflicts, including odors, with adjacent land uses. The 2040 General Plan Land Use Map (Figure 4) in Section 2, *Project Description*) would ensure consistency of surrounding land uses with odor producing land uses. Other odors from buildout of the 2040 General Plan include odor emissions that would be limited to odors associated with vehicle and engine exhaust and idling. During construction activities, only short-term, temporary odors from vehicle exhaust and construction equipment engines would occur. Therefore, impacts would be less than significant.

Mitigation Measure

Impacts would be less than significant; therefore, mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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4.4 Biological Resources

This section addresses direct and indirect impacts to the following special-status biological resources: regulated waterways and wetlands, sensitive habitats and mature native trees, sensitive plants and animals, and wildlife movement corridors.

4.4.1 Setting

General Plan Area Vegetation Communities

The Town of Windsor is located in the Russian River Valley and the northern edge of the Santa Rosa Plain. The Russian River Valley is an ecologically diverse area that provides habitat for warm and cool freshwater fish migration and spawning. The Santa Rosa Plain was historically a vast oak savannah grassland, dotted with vernal pools and swales that fill with water during the spring months. Numerous streams and creeks stem from the surrounding mountains to the east and cross the town, and remnant open space areas retain the resource values of the oak savannah. The Russian River, located west of the town, provides specialized habitat for numerous species and is the largest river in the Central California Coast Steelhead trout (*Oncorhynchus mykiss*) distinct population segment. Oak woodlands and riparian vegetation line the creeks and streams, open annual grassland are located along the western edges of the town, and seasonal swales and vernal pools scattered throughout the landscape. These areas provide communities for endemic plants and animals, nesting habitat, and wildlife corridors for numerous special status species (Town of Windsor 2015a). Figure 7 shows the vegetation communities within the town limits and Figure 8 shows natural communities and special-status species in the project vicinity.

Wildlife habitats are classified in general terms with an emphasis on vegetation structure, vegetation species composition, soil structure, and water availability. Habitat types within the town include: coast live oak woodland, north coast black cottonwood riparian forest, annual grassland, wetlands and water features including vernal pools, and urban developed/disturbed including ornamental landscape. The habitat types known to occur within the Town, as classified in Holland (1986) and/or Sawyer and Keeler-Wolf (1995), are listed and briefly described below.

Coast Live Oak Woodland

Coast live oak woodland is typically dominated by one tree species, coast live oak (*Quercus agrifolia*), which is evergreen and reaches 33 to 83 feet. The shrub layer may include toyon (*Heteromeles arbutifolia*), gooseberry (*Ribes* spp.), and blue elderberry (*Sambucus nigra* ssp. *caerulea*). This community integrates with coastal scrub and mixed chaparral communities on drier sites and with other oak and evergreen forests on moister sites. This habitat provides foraging, nesting, and shelter habitat for a wide variety of birds, amphibians, reptiles, and mammals.

North Coast Black Cottonwood Riparian Forest

This habitat is located on bottomlands, floodplains, gravel bars, and perennial stream banks. The overstory is generally dominated by black cottonwood (*Populus trichocarpa*), willows (*Salix* spp.), and red alder (*Alnus rubra*). Understory plants can include twinberry (*Lonicerainvolucrata*), western sword fern (*Polystichum munitum*), snowberry (*Symphoricarpos mollis*), and salmonberry (*Rubus spectabilis*). North Coast black cottonwood riparian forest provides a wide range of resources to

Figure 7 Vegetation Communities

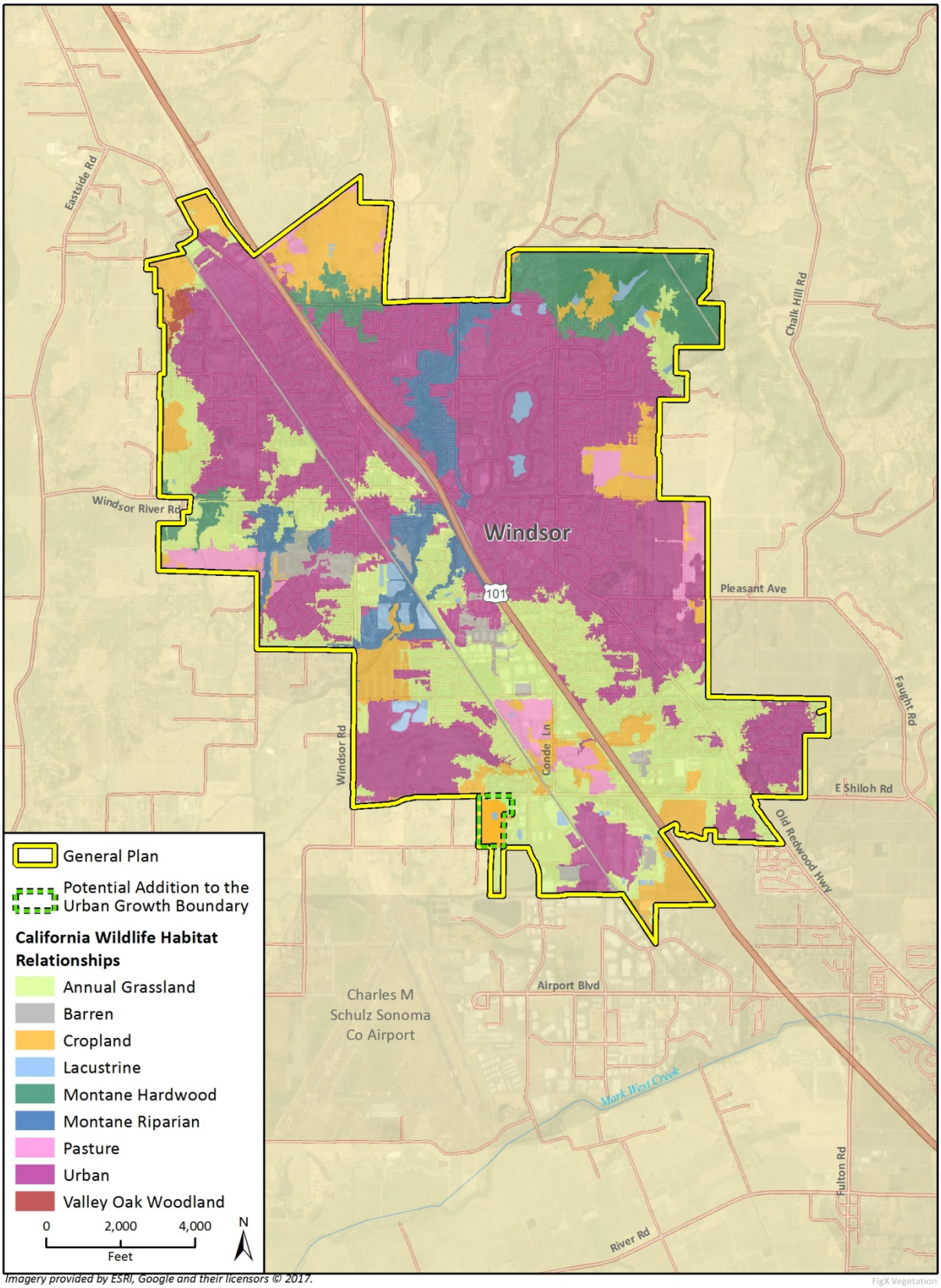
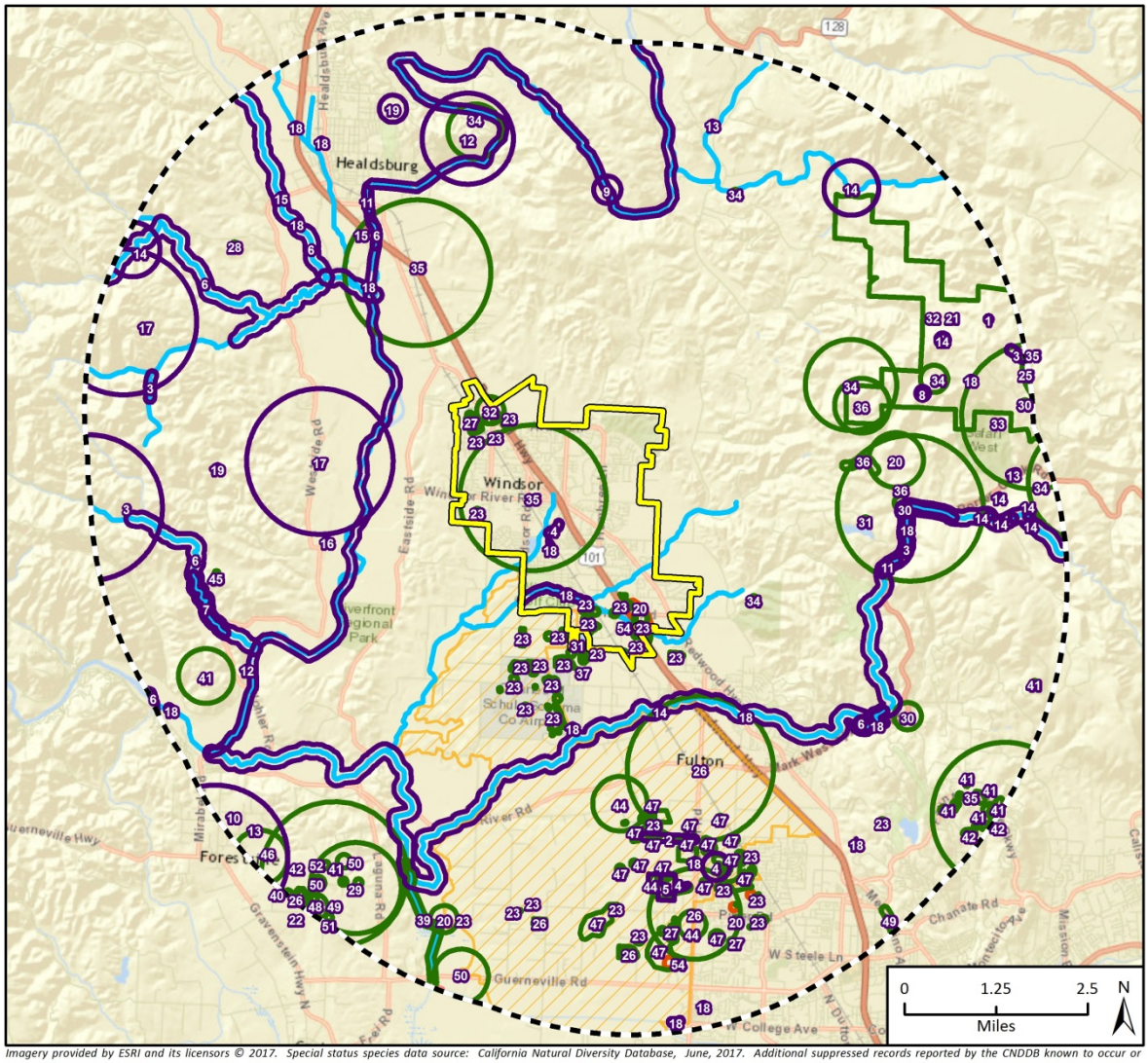


Figure 8 Special-status Species and Natural Communities Reported by the California Natural Diversity Database



Imagery provided by ESRI and its licensors © 2017. Special status species data source: California Natural Diversity Database, June, 2017. Additional suppressed records reported by the CNDDB known to occur or potentially occur within this search radius include: Pitkin Marsh Lily. For more information please contact the Department of Fish and Game. Critical habitat data source: U.S. Fish and Wildlife Service, May, 2017. Final critical habitat acquired via the USFWS Critical Habitat Portal. It is only a general representation of the data and does not include all designated critical habitat. Contact USFWS for more specific data.

General Plan Area
5-Mile Buffer

CNDDB

Animals
Plants
Natural Communities

Critical Habitat

California tiger Salamander (Sonoma)
Chinook salmon
Steelhead

1 - American badger
2 - Blennosperma vernal pool andrenid bee
3 - California giant salamander
4 - California linderiella
5 - California tiger salamander
6 - coho salmon - central California coast ESU
7 - foothill yellow-legged frog
8 - fringed myotis
9 - great blue heron
10 - hoary bat
11 - Navarro roach
12 - osprey
13 - pallid bat
14 - red-bellied newt
15 - Russian River tule perch
16 - steelhead - central California coast DPS
17 - Townsend's big-eared bat
18 - western pond turtle
19 - white-tailed kite
20 - Baker's navarretia
21 - Boggs Lake hedge-hyssop
22 - brownish beaked-rush
23 - Burke's goldfields
24 - California beaked-rush
25 - Cobb Mountain lupine
26 - congested-headed hayfield tarplant
27 - dwarf downingia
28 - fragrant fritillary
29 - holly-leaved ceanothus
30 - Jepson's leptosiphon
31 - many-flowered navarretia
32 - marsh microseris
33 - Mt. Saint Helena morning-glory
34 - Napa false indigo
35 - narrow-anthered brodiaea
36 - oval-leaved viburnum
37 - pappose tarplant
38 - Pennell's bird's-beak
39 - Peruvian dodder
40 - Pitkin Marsh paintbrush
41 - Rincon Ridge ceanothus
42 - Rincon Ridge manzanita
43 - round-headed beaked-rush
44 - Sebastopol meadowfoam
45 - serpentine daisy
46 - Sonoma alopecurus
47 - Sonoma sunshine
48 - thin-lobed horkelia
49 - two-fork clover
50 - Vine Hill ceanothus
51 - Vine Hill clarkia
52 - Vine Hill manzanita
54 - Northern Hardpan Vernal Pool

Fig CNDDB_5miBuffer

wildlife, such as movement and migration corridors, cover (nesting, resting, thermal, etc.), water, and a variety of foraging opportunities.

Annual Grassland

This community is found on fine-textured, usually clay soils, which may range from moist, possibly even waterlogged during the rainy season, to very dry during the dry season. Annual grassland is primarily composed of non-native annual grasses although native annual forbs (wildflowers) may also be present during years of favorable precipitation. Many grassland species also occur as understory plants in oak woodland and other habitats. Characteristic species include wild oats (*Avena* spp.), bromes (*Bromus* spp.), Italian ryegrass (*Lolium multiflorum*), California poppy (*Eschscholzia californica*), lupine (*Lupinus* spp.), Italian thistle (*Carduus pycnocephalus*), English plantain (*Plantago lanceolata*), and common vetch (*Vicia sativa*). Grasslands provide foraging and nesting habitat for a wide variety of wildlife species including raptors, seed eating birds, small mammals, amphibians, and reptiles.

Wetlands and Water Features

Wetlands and water features include freshwater sloughs, swamps, vernal pools, wet meadows, wet pastures, springs and seeps, portions of lakes, ponds, rivers and streams, and all other areas which are periodically or permanently covered by shallow water, or dominated by hydrophic vegetation, or in which the soils are predominantly hydric in nature. Seasonal wetlands, including the aquatic environments of the floor of flood control channels, are often formed when ditches and depressions are excavated. Seasonal wetlands can be populated by plants species such as semaphore grass (*Pleuropogon californicus*), spike rush (*Eleocharis macrostachya*), water knotweed (*Polygonum lapathifolium*), water evening primrose (*Ludwigia peploides*), pennyroyal (*Mentha pulegium*), rabbits foot grass (*Polypogon monspeliensis*), barnyard grass (*Echinochloa crus galli*), and eragrostoid sedge (*Cyperus eragrostis*). These species are either low-growing, tenacious perennials that tolerate the annual maintenance activities being carried out in the channels and ditches, or are annuals that tolerate seasonal wetness and mowing, but later produce seed for the next season. The edges of such wetlands are often dominated by non-native annual weeds including annual ryegrass, alkali mallow (*Malvella leprosa*), peppergrass (*Lepidiumlati folium*), and bristly ox-tongue (*Picris echioides*). Vernal pools, seasonal water features found in small depressions with a hardpan soil layer, support downingia, meadow foam (*Limnanthes alba*), and other species. Water habitats typically support fish species and also provide foraging, cover, and breeding habitat for other aquatic species.

Urban Developed/Disturbed

The urban landscape consists of developed land, the golf course, and urban parks. Wildlife species that use urban habitat vary depending on the density of development, the surrounding land use, and the types and availability of vegetation and other habitat features available for foraging, nesting, and cover. In general, wildlife habitat in urban areas consists of landscaped areas with a mix of both native and exotic ornamental plant species. Species using these areas are conditioned to a greater level of human activity than those in natural and less developed areas. Generally, the more developed an urban area is, the less diverse the species will be.

Special Status Resources

The term special-status biological resources includes those plants, animals, vegetation communities, jurisdictional drainages and other sensitive biological resources that are governed under federal, state, and local laws and regulations. Information regarding the occurrences of special-status species in the vicinity of the General Plan Area was obtained from searching the CDFW Natural Diversity Data Base (CNDDB) (January 2017), U.S. Fish and Wildlife Service (USFWS) Information for Planning and Conservation (IPaC) (date), and California Native Plant Society's (CNPS) Electronic Inventory (January 2017) for the U. S. Geological Survey (USGS) *Healdsburg* and eight surrounding 7.5-minute quadrangles. These databases contain records of reported occurrences of federal- or state-listed endangered, threatened, rare, or proposed endangered or threatened species, federal species of concern, state species of special concern, or otherwise sensitive species or habitat that may occur within a five-mile radius of the General Plan Area. Lists from the USFWS and CDFW were also reviewed, and lists of common and sensitive wildlife and plant species potentially occurring within the General Plan Area were created. This search range encompasses a sufficient distance to accommodate for regional habitat diversity and to overcome the limitations of the CNDDB (the CNDDB is based on reports of actual occurrences and does not constitute an exhaustive inventory of every resource). See Appendix C for detailed species lists. Figure 8 shows special-status species in the project vicinity.

Listed Species

Federal, State, and local authorities under a variety of legislative acts share regulatory authority over biological resources. The CDFW has direct jurisdiction under law for biological resources through the State Fish and Game Code and under the California Endangered Species Act (CESA). The federal Endangered Species Act (FESA) also provides direct regulatory authority over specially designated organisms and their habitats to the USFWS. These acts specifically regulate listed and candidate endangered and threatened species, which are defined as:

- **Endangered Species**: any species that is in danger of extinction throughout all or a significant portion of its range
- **Threatened Species:** any species that is likely to become an endangered species within the foreseeable future throughout all or a significant part of its range

Special-Status Wildlife

Reptile and invertebrate species of concern are known or possibly found in the General Plan, based on a search of the CNDDB. Table 1 of Appendix C identifies animal species with the potential to occur in the project vicinity based on a search of the CNDDB and USFWS IPaC, five of which have federal and/or State listing status. These include the Federally Endangered and State Endangered California freshwater shrimp (*Syncaris pacifica*), Coho salmon central California coast (*Oncorhynchus kisutch*); Federally Threatened and State Threatened California tiger salamander (*Ambystoma californiense*); and Federally Threatened California red-legged frog (*Ambystoma californiense*) and Steelhead central California coast (*Oncorhynchus mykiss irideus*). The foothill yellow-legged frog (*Rana boylii*), which occurs in the vicinity of the General Plan Area, is currently (October 2017) being considered for listing by the California Fish and Game Commission as a threatened species. As a candidate species defined by Section 2068 of the Fish and Game Code, the Department will publish a written report with the official findings of candidacy within one year (June 2018) (California Fish and Game Commission 2017). Figure 8 identifies the general locations of sensitive wildlife species

identified by the CNDDB surrounding the General Plan Area (February 2017). While Figure 8 shows only two of these species, California tiger salamander and Coho salmon, occurring within the General Plan Area, the others occur within the 7.5-minute quadrangles surrounding region, and thus could potentially also occur within the General Plan Area. State or federally listed species are accorded the highest protection status.

Special-Status Plants

Special-status plant species are either listed as endangered or threatened under the CESA or FESA, or rare under the California Native Plant Protection Act, or considered to be rare (but not formally listed) by resource agencies and the scientific community. CDFW and local governmental agencies may also recognize special listings developed by focal groups (i.e. Audubon Society Blue List; CNPS Rare and Endangered Plants; U.S. Forest Service regional lists). Table 2 of Appendix C shows 99 special-status plant species that have the potential to occur within the General Plan Area and eight surrounding 7.5-minute quadrangles, 17 which have State and/or federal listing status. These include the Federal and State Endangered Sonoma sunshine (*Blennosperma bakeri*), Sonoma spineflower (*Chorizanthe valida*), vine hill clarkia (*Clarkia imbricate*), Baker's larkspur (*Delphinium bakeri*), Burke's goldfields (*Lasthenia burkei*), Pitkin Marsh lily (*Lilum pardalnum* ssp. *pitkinense*), Sebastopol meadowfoam (*Limnanthes vinculans*), many-flowered navarretia (*Navarretia leucocephala* ssp. *plieantha*), and Kenwood Marsh checkerbloom (*Sidalcea oregana* ssp. *valida*); Federal Endangered Sonoma alopecurus (*Alopecurus aequalis* var. *sonomensis*), Pennell's bird's-beak (*Cordylanthus brunneus* ssp. *capillaris*), Golden larkspur (*Delphinium luteum*), and Two-fork clover (*Trifolium amoenum*); State Endangered vine hill manzanita (*Arctostaphylos densilflora*), Pitkin marsh paintbrush (*Castilleja uliginosa*), and Boggs Lake hedge-hyssop (*Gratiola hterosepala*); and State Threatened North Coast semaphore grass (*Pleuropogon hooverianus*) (CNPS 2017). Figure 8 illustrates the general locations of special-status plant species documented within the General Plan Area by the CNDDB (February 2017).

Special-Status Habitats

Special-status habitats are vegetation types, associations, or sub-associations that support concentrations of special-status plant or wildlife species, are of relatively limited distribution, or are of particular value to wildlife. Although special-status habitats are not afforded legal protection unless they support special-status species, potential impacts on them may increase concerns and trigger mitigation suggestions by resources agencies for those habitats considered sensitive by federal, State, and local agencies due to their rarity or value in providing habitat for vegetation, fish, and wildlife.

Sensitive habitats are special-status plant communities considered sensitive by federal, State, and local agencies due to their rarity or value in providing habitat for vegetation, fish, and wildlife. Sensitive habitats present within the General Plan Area include: vernal pool, wetland, and north coast black cottonwood riparian forest.

The General Plan Area contains some natural, semi-natural drainages (see Impact discussion BIO-3), and other natural, undeveloped areas, the following special-status habitats may be present within the plan area:

- Drainages, wetlands and associated riparian vegetation under the jurisdiction of CDFW as waters of the State or U.S. Army Corps of Engineers (USACE) as waters of the U.S. Wildlife Linkages and Corridors

Wildlife Corridors

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. North Coast black cottonwood riparian habitat in the Town provides a movement and migration corridor for a wide range of wildlife species.

Regulatory Setting

The following is a summary of the regulatory context under which biological resources are managed at the federal, state, and local level. Agencies with responsibility for protection of biological resources within the General Plan Area include:

- U.S. Fish and Wildlife Service (federally listed species and migratory birds)
- U.S. Army Corps of Engineers (USACE; wetlands and other waters of the United States)
- California Department Fish and Wildlife (waters of the State, state listed and fully protected species, and other sensitive plants and wildlife)
- San Francisco Bay Regional Water Quality Control Board (RWQCB; waters of the State)
- Town of Windsor (Municipal Code and 1996 General Plan)

The following discussion provides a summary of those laws that are most relevant to biological resources in the vicinity of the General Plan Area.

U.S. Fish and Wildlife Service

The USFWS implements the Migratory Bird Treaty Act (MBTA; 16 USC Section 703-711) and the Bald and Golden Eagle Protection Act (16 United States Code (USC) Section 668). USFWS and the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (also called NOAA Fisheries) share responsibility for implementing the FESA (16 USC § 153 *et seq*). USFWS generally implements the FESA for land and freshwater species, while NOAA Fisheries implements the FESA for marine and anadromous species. Projects that would result in take of any federally listed threatened or endangered species are required to obtain permits from the USFWS or NOAA Fisheries through either Section 7 (interagency consultation with a federal nexus) or Section 10 (Habitat Conservation Plan) of FESA, depending on the involvement by the federal government in permitting or funding the project. The permitting process is used to determine if a project would jeopardize the continued existence of a listed species and what mitigation measures would be required to avoid jeopardizing the species.

The FESA also prohibits any activity that kills or injures fish or wildlife, and emphasizes that such activities may include significant habitat modification or degradation that significantly impairs essential behavioral patterns of fish or wildlife. Take under federal definition means to harass, harm (which includes habitat modification), pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Proposed or candidate species do not have the full protection of FESA; however, the USFWS and NOAA Fisheries advise project applicants that they could be elevated to listed status at any time.

The MBTA, as amended in 1972, protects nesting migratory birds by making it unlawful to "take" (kill, harm, harass, etc.) any migratory bird listed in 50 CFR 10, including their nests, eggs, or products. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many other species. It is possible that other state or federal sensitive or special-status avian species may also be adversely affected by new development in the Town.

U.S. Army Corps of Engineers

Under Section 404 of the Clean Water Act and section 10 of the Rivers and Harbors Act, the USACE has authority to regulate activity that could discharge fill or dredge material or otherwise adversely modify wetlands or other waters of the United States. Perennial and intermittent creeks and adjacent wetlands are considered waters of the United States and are within the regulatory jurisdiction of the USACE. The USACE implements the federal policy embodied in Executive Order 11990, which, when implemented, is intended to result in no net loss of wetland values or acres. In achieving the goals of the Clean Water Act, the Corps seeks to avoid adverse impacts and to offset unavoidable adverse impacts on existing aquatic resources. Any fill or adverse modification of waters of the U.S., wetlands would require a permit from the Corps prior to the start of work. Typically, permits issued by the Corps are a condition of a project as mitigation to offset unavoidable impacts on wetlands and other waters of the U.S. in a manner that achieves the goal of no net loss of wetland acres or values.

California Department of Fish and Wildlife

CDFW derives its authority from the Fish and Game Code of California Species listed under the CESA (Fish and Game Code Section 2050 *et seq*.), which prohibits take of listed threatened or endangered species. A "take" is defined under CESA as to hunt, pursue, catch, capture, or kill a protected species, or to make an attempt at these actions.

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

Species of Special Concern (SSC) is a category used by CDFW for those species considered to be indicators of regional habitat changes or considered to be potential future protected species. SSC do not have any special legal status except that afforded by the Fish and Game Code. The SSC category is intended by the CDFW for use as a management tool to include these species into special consideration when decisions are made concerning the development of natural lands.

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

Perennial and intermittent streams also fall under the jurisdiction of CDFW. Sections 1600 *et. seq*. of the Fish and Game Code (Streambed Alteration Agreements) gives CDFW regulatory authority over work within the stream zone (which could extend to the 100-year flood plain) consisting of, but not limited to, the diversion or obstruction of the natural flow or changes in the channel, bed, or bank of any river, stream or lake.

Regional Water Quality Control Board

The protection of water quality in the watercourses of the Town of Windsor is under the jurisdiction of the North Coast Regional Water Quality Control Board (RWQCB). The RWQCB is responsible for the development, adoption, and implementation of the Water Quality Control Plan (Basin Plan) for the North Coast Region. The Basin Plan is the master policy document that contains descriptions of the legal, technical, and programmatic bases of water quality regulation in the North Coast Region. The Basin Plan identifies beneficial uses of surface waters and groundwater within its region and specifies water quality objectives to maintain the continued beneficial uses of these waters.

Town of Windsor

Municipal Code

Chapter 27.36 of the Town of Windsor's Zoning Ordinance, the Tree Preservation and Protection Ordinance (the Ordinance), regulates protection, preservation, maintenance, and removal of protected trees. The intent of the Ordinance is to avoid a reduction in tree canopy cover by requiring replacement trees for all protected trees that are approved for removal. Protected trees under the Ordinance include: trees with a diameter at breast height (dbh) of six inches or more of the species black oak (*Quercus kelloggii*), blue oak (*Quercus douglasii*), coast live oak, interior live oak (*Quercus wislizenii*), oracle oak (*Quercus morehus*), Oregon oak (*Quercus garryana*), valley oak (*Quercus lobata*), chase oak (*Quercus chaseii*); and trees with a dbh of 12 inches or more of the species California buckeye (*Aesculus californica*) and California bay (*Umbellularia californica*); heritage or landmark trees as identified by Council resolution; significant groves or stands of trees; mature trees located on a parcel of one acre or more; and any tree required, to be planted or preserved, as environmental mitigation for a discretionary permit. Section 27.36.061, Tree Mitigation, is an amendment to the Ordinance. The amendment will "generally replace a smaller quantity of larger trees by replanting a larger quantity of smaller trees, with the goal of restoring the original canopy area and volume after ten years." The amendment also states that to obtain a tree removal permit, an arborist report is required for all development projects with protected trees. The arborist will make recommendations on the removal as well as on the mitigation to offset the loss of the tree(s).

4.4.2 Impact Analysis

Methodology and Significance Thresholds

Methodology

The impact analysis is based on available literature regarding the existing biological resources within the General Plan Area. Environmental impacts relative to biological resources may be assessed using impact significance criteria from federal, State, and local regulations. Project impacts to flora and fauna may be determined to be significant even if they do not directly affect rare, threatened, or endangered species.

CEQA, Chapter 1, Section 21001 (c) states that it is the policy of the State of California to "prevent the elimination of fish and wildlife species due to man's activities, ensure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities." Environmental impacts relative to biological

resources may be assessed using impact significance criteria encompassing CEQA guidelines and federal, State and local plans, regulations, and ordinances.

Significance Thresholds

Appendix G of the *State CEQA Guidelines* provides the following general statements to determine that significant impacts to biological resources could occur if a project action would:

1 Have a substantial adverse effect (i.e. significantly reduce species population, reduce species habitat, restrict reproductive capacity), either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, regulations, or by CDFW or USFWS;

2 Have a substantial adverse effect (i.e. direct/indirect reduction) on any riparian habitat or other sensitive natural community identified in local or regional plans, policies regulations, or by the CDFW or USFWS;

3 Have a substantial adverse effect (i.e. direct/indirect reduction) 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, or hydrological interruption, or other means;

4 Interfere substantially (i.e. direct/indirect reduction) with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and

6 Conflict with the provisions of an adopted Habitat Preservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Project Impacts and Mitigation Measures

Threshold:	Have a substantial adverse effect (i.e. significantly reduce species population, reduce species habitat, restrict reproductive capacity), either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, regulations, or by CDFW or USFWS; or have a substantial adverse effect (i.e. direct/indirect reduction) on any riparian habitat or other sensitive natural community identified in local or regional plans, policies regulations, or by the CDFW or USFWS.

IMPACT BIO-1 WITH IMPLEMENTATION OF THE GOALS AND POLICIES IN THE 2040 GENERAL PLAN AND MITIGATION MEASURE AES-1 TO REDUCE LIGHT AND GLARE, DIRECT AND INDIRECT IMPACTS TO LISTED SPECIAL-STATUS SPECIES AND SENSITIVE HABITATS WOULD BE AVOIDED. IMPACTS WOULD THEREFORE BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

As indicated in Subsection 4.4.1, *Setting*, a variety of wildlife species are present throughout the Town, including various bird and mammal species. Areas that may provide habitat for special-status species in the Town are primarily located in the open space areas throughout the Town.

As shown in Figure 8, special-status State or federally listed species with the potential to occur in the Town include coho salmon and California tiger salamander. State or federally listed special-status plant species with the potential to occur in the Town include Burke's goldfields, many-

flowered navarretia, and Sonoma sunshine. As shown in Figure 7, the majority of special-status plant communities occur along creeks and streams in the middle of the Town. Special-status plant communities within Windsor include vernal pool, wetland, and north coast black cottonwood riparian forest.

The goals and policies of the 2040 General Plan support growth within the Town limits. New development would occur where existing roads, water, and sewer are in place and in a manner that minimizes the impacts of development on existing infrastructure and services and respects natural resources. One of the guiding principles of the 2040 General Plan is to ensure that the Town's development standards encourage sensitive site design to preserve and enhance natural resources. In addition, all development under the 2040 General Plan would be subject to the provisions of the various federal and State natural resources regulations (discussed in Subsection 4.4.1, *Setting*) and their respective permitting processes. Further, the 2040 General Plan goals and policies shown below would encourage the conservation and protection of public open space and natural resources within the Town, thus protecting special-species.

Land Use Element Policies

Policy LU-2.7 *Clustering Residential Development*. The Town shall allow for the clustering of residential uses and the use of creative site planning techniques when environmentally-sensitive areas are present on a site.

Policy LU-2.8 *Reduced Density in Environmentally-Sensitive Areas*. The Town shall allow residential development below the minimum density when the established density standards are infeasible due to the presence of environmentally-sensitive areas on a site

Environmental Resources Element Goals and Policies

Goal ER-1: Open Space. Preserve open space land for the continuation of commercial agricultural and productive uses, the protection and use of natural resources, the enjoyment of scenic beauty and recreation, and the protection from natural hazards.

Policy ER-1.1 *Open Space Preservation*. The Town shall seek to preserve open space resources (i.e., productive farmlands, outdoor recreation areas, biological habitats, visually prominent landforms, Alquist-Priolo Special Study Zones, and flood hazard areas) through avoidance of development in these areas.

Policy ER-1.2 *Sensitive Habitat Preservation*. The Town shall encourage the preservation of sensitive environmental habitat areas, such as oak woodlands, productive farmlands, riparian (creekside) corridors, through measures such as clustering development and conservation easements.

Policy ER-1.7 *Open Space Protection Techniques*. The Town shall employ a variety of techniques to protect open space resources, including land acquisition, conservation easements, dedications and property owner/developer exactions, and impact mitigations. Expenditure of public funds should be considered only when the primary intent of the open space is for a public land use that will benefit the entire community and where future development may preclude the use of large areas deemed appropriate for recreational opportunities.

Goal ER-3: Water Resources. Protect, manage, and improve natural creek habitats and the quality of the Town's surface water and groundwater resources.

Policy ER-3.1 ***Preservation of Waterways*****.** Whenever possible, creeks should be conserved in, or restored to, their natural states to carry storm waters, to maintain a natural appearance, and to protect fisheries. Portions of the channels that have been significantly altered for flood control should still be used for urban open space.

Policy ER-3.2 ***Development Along Creeks*****.** The Town shall protect, preserve, and improve creeks by requiring that development activities along creeks be conducted using Low Impact Development (LID) principles, appropriate creek setbacks, and Best Management Practices that seek to minimize the discharge of sediments and urban pollutants into the waterways and that are consistent with the NPDES permit.

Policy ER-3.3 ***Creek Maintenance*****.** The Town shall manage and improve Windsor's natural creek system as an important natural, fishery, and visual resource by maintaining the creeks in their natural state, encouraging their incorporation into a trail system, and keeping them free and clear of debris, refuse and other man-made pollutants.

Goal ER-6: Biological Resources. Protect unique and sensitive biotic features such as rare and endangered plant and animal species, dense oak woodlands, and vernal pools, and encourage sensitive design in these areas.

Policy ER-6.1 ***Protection of Biological and Ecological Resources*****.** The Town shall protect significant biological and ecological resources in Windsor, including:

a. Wetlands, in particular, high value wetlands
b. Rare, threatened, or endangered species
c. Vulnerable habitats
d. Vernal pools
e. Oak groves and woodlands
f. Riparian woodlands
g. Heritage trees

Policy ER-6.2 ***Sensitive Resources Inventory for New Development*****.** The Town shall require a detailed inventory of sensitive resources conducted by an independent, professionally qualified biologist, plant ecologist, arborist, or appropriately qualified specialist for development proposals in sensitive and vulnerable habitats. If sensitive resources are identified on the project site, proposals to protect them shall conform with applicable State and Federal regulations regarding their protection and may include avoidance of the resource, installing vegetative buffers, providing setbacks, clustering development onto less sensitive areas, preparing restoration plans, and off-site mitigation.

Policy ER-6.3 ***Biological Studies for Undeveloped Areas*****.** The Town shall require project applicants to provide a biological assessment for projects on undeveloped parcels, unless a biological assessment has previously been prepared for the specific site. The purpose of these assessments is to identify appropriate mitigation measures to avoid or minimize harm to these resources and to incorporate the recommended measures as conditions of approval.

Policy ER-6.5 ***Applicant Mitigation Obligation*****.** The Town shall ensure the protection or restoration of sensitive biological resources that is required as a condition or mitigation of a development project is closely monitored at the cost of the project applicant to determine compliance with the condition or mitigation and to evaluate the effectiveness of the measure.

Land Use policies LU-2.7 and LU-2.8 would minimize impacts from potential direct effects to special-status species because the policies would allow clustered development and development below the minimum density in areas with environmentally sensitive resources. These policies would result in less development in environmentally sensitive areas, thus protecting sensitive species. Environmental Resources policies under Goals 1, 3, and 6 would minimize impacts from potential direct effects to sensitive special-status species. Specifically, Policy ER-6.3, would require a biological assessment for development on undeveloped parcels and Policy ER-6.2 would require an inventory of sensitive resources for development proposals in sensitive and vulnerable habitat areas. The preparation of biological assessments and inventories of sensitive resources prior to development would ensure that potential special-status species that could be impacted by future development would be identified and potential impacts would be reduced or avoided. Therefore, implementation of these policies would avoid potential direct impacts to sensitive species.

However, there remains the potential for new development to result in indirect effects, such as effects that may result from lighting or dust on sensitive habitat and special-status species in areas adjacent to or near proposed development. Mitigation contained in Section 4.1 *Aesthetics*, would reduce potential impacts related to lighting. Furthermore, the 2040 General Plan focuses the majority of potential future development in areas with existing services to minimize impacts of development on natural resources, including indirect effects to sensitive species. For these reasons, impacts would be less than significant with mitigation incorporated.

Mitigation Measures

Mitigation Measures AES-1 would require lighting shielding and/or lighting directed downward to limit overspill and glare.

Significance After Mitigation

Impacts to special-status species and habitats would be less than significant.

Threshold:	Have a substantial adverse effect (i.e. significantly reduce species population, reduce species habitat, restrict reproductive capacity), either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, regulations, or by CDFW or USFWS.

IMPACT BIO-2 IMPLEMENTATION OF THE 2040 GENERAL PLAN WOULD NOT RESULT IN A REDUCTION IN NESTING OPPORTUNITIES FOR RESIDENT AND MIGRATORY AVIAN SPECIES OF SPECIAL CONCERN BECAUSE OF CONSERVATION AND PRESERVATION POLICIES WITHIN THE 2040 GENERAL PLAN AND COMPLIANCE WITH THE MIGRATORY BIRD TREATY ACT. HOWEVER, NEW DEVELOPMENT UNDER THE 2040 GENERAL PLAN MAY IMPACT SPECIAL-STATUS NESTING BIRDS; IMPACTS WOULD BE SIGNIFICANT BUT MITIGABLE.

As with most urbanized environments, landscape features within the Town, such as trees, shrubs, herbaceous plants, and parklands, could serve as temporary habitats or foraging grounds for wildlife. As discussed in Subsection 4.4.1, *Setting*, migratory avian species that may use portions of the Town for nesting during the breeding season are protected under the MBTA. Construction-related activities such as building demolition and/or relocation, grading, materials laydown, access and infrastructure improvements, and building construction, could result in the disturbance of nesting migratory species covered under the MBTA. The most identifiable potential direct impact to migratory species would involve the removal of vegetation, particularly trees that may serve as perching or nesting sites for migratory birds. This could occur in the existing landscape vegetation

and natural areas throughout the Town. Potential direct impacts related to the removal of trees would be limited by the 2040 General Plan and the Town of Windsor Ordinance Code.

Chapter 27.36, Tree Preservation and Protection Ordinance was developed to regulate protection, preservation, maintenance and removal of protected trees. The Chapter requires replacement of protected trees and a tree removal permit. Impacts related to the removal of vegetation not covered under the ordinance could have adverse effects on nesting migratory species. However, 2040 General Plan goals and policies listed below, as well as Policies ER-1.1, -1.2, -1.7 and -6.1 listed above, would help to offset the potential impacts to trees by preserving and enhancing natural areas and promoting tree protection and replacement.

Environmental Resources Element Goals and Policies

Goal ER-6: Biological Resources. Protect unique and sensitive biotic features such as rare and endangered plant and animal species, dense oak woodlands, and vernal pools, and encourage sensitive design in these areas.

> **Policy ER-6.7** ***Preservation of Oak Woodlands*****.** The Town shall encourage the preservation of oak woodlands and significant stands of oaks and heritage trees. Development plans should indicate preservation of these resources to the fullest extent feasible and restrict pavement and other encroachments within the root zones of oak trees to ensure their long-term survival. Should removal be necessary, the project applicant shall be required to plant replacement trees or removal can be done through the payment of an in-lieu fee.
>
> **Policy ER-6.8** ***Tree Protection During Construction*****.** The Town shall require proper measures be implemented to ensure the long-term survival of trees designated in the Tree Preservation and Protection Ordinance during construction activities. Fencing around individual trees or groups of trees shall be required to protect them from compaction and mechanical injury.
>
> **Policy ER-6.11** ***Natural Area Acquisition*****.** The Town shall support Sonoma County and other open space organizations in efforts to acquire valuable ecological lands.

Under provisions of the federal MBTA, it is unlawful "by any means or manner to pursue, hunt, take, capture, (or) kill" any migratory birds except as permitted by regulations issued by the USFWS. The term "take" is defined by USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture, or collect" any migratory bird or any part, nest or egg of any migratory bird covered by the conventions, or to attempt those activities. Migratory birds include all native birds in the Unites States, except those non-migratory species such as quail and turkey that are managed by individual states. Compliance with the MBTA, 2014 General Plan policies, and the Windsor Ordinance Code would prevent take of migratory bird species and ensure protection of trees during buildout of the 2040 General Plan, but would not provide protection specific to nesting birds during new development. Impacts would be potentially significant.

Mitigation Measures

The following mitigation measure is required to reduce impacts from development on nesting birds.

BIO-1 Nesting Bird Protection ~~Policy~~

~~The following policy shall be added to the 2040 General Plan Environmental Resources Element as Policy ER-6.12:~~

The Town shall require project applicants to retain the services of a qualified biologist(s) to conduct a pre-construction nesting bird survey during the nesting season (February 1 through August 31) prior to all new development that may remove any trees or vegetation that may provide suitable nesting habitat for migratory birds or other special-status bird species. If nests are found the qualified biologist(s) shall identify appropriate avoidance measures.

Significance After Mitigation

Impacts would be less than significant with implementation of Mitigation Measure BIO-1 to ~~add a policy to the General Plan to~~ conduct pre-construction nesting bird surveys and implement avoidance measures if appropriate.

Threshold:	Have a substantial adverse effect (i.e. direct/indirect reduction) 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, or hydrological interruption, or other means.

IMPACT BIO-3 WHILE THE 2040 GENERAL PLAN WOULD NOT FACILITATE DEVELOPMENT THAT WOULD DIRECTLY IMPACT RIPARIAN AND WETLAND HABITS, THERE WOULD BE POTENTIAL FOR ADVERSE INDIRECT IMPACTS FROM SUCH DEVELOPMENT ON WETLANDS AND AREAS UNDER THE JURISDICTION OF THE CDFW AND USACE. HOWEVER, COMPLIANCE WITH EXISTING REGULATIONS, AND IMPLEMENTATION OF 2040 GENERAL PLAN POLICIES WOULD REDUCE POTENTIAL IMPACTS TO A LESS THAN SIGNIFICANT LEVEL.

Wetlands in the Windsor vicinity include freshwater sloughs, swamps, vernal pools, wet meadows and pastures, springs and seeps, and seasonal wetlands. The National Wetlands Inventory (NWI) (2016) shows the extent of major wetland habitat types in the Windsor vicinity mapped, which consists of a range of characteristic wetland types, together with streams mapped by Sonoma County. These wetland habitats include riverine wetlands along creeks, freshwater emergent wetlands, major creeks and channels, and freshwater forested scrub/wetland. In the vicinity of Windsor there are several streams and creeks including Windsor Creek, East Windsor Creek, Pool Creek, Starr Creek, and Pruitt Creek. Some wetland features, such as freshwater seeps and springs, are generally not identified as part of the NWI because of the general scale of the mapping effort. Detailed wetland delineations would be needed to determine the extent of any jurisdictional wetlands and other waters at specific locations and the USACE is responsible responsibility for making a final determination on the extent of jurisdictional waters for a particular site.

Wetland and waterway areas may be subject to USACE jurisdiction. Compliance with the requirements of the Clean Water Act would be required for any project proposed under the 2040 General Plan. In addition, the following goals and policies from the Environmental Resources Element of the 2040 General Plan listed below and Policies ER-1.1, -1.2, -1.7, -3.1 through -3.3, and -6.1 through -6.5 listed above, would reduce impacts to federally protected wetlands and riparian habitat through preservation and enhancement of wetland and riparian habitats.

Environmental Resources Element Goals and Policies

Goal ER-6: Biological Resources. Protect unique and sensitive biotic features such as rare and endangered plant and animal species, dense oak woodlands, and vernal pools, and encourage sensitive design in these areas.

Policy ER-6.6 ***Prohibition of Certain Activities in Riparian Habitats*****.** The Town shall prohibit dumping or disposal of refuse; confinement of livestock; and structural improvements except

necessary water supply projects, flood control projects, fish and wildlife enhancement projects, trail projects, road and bridge projects, and utility projects in significant riparian areas.

The policies listed above contained within Environmental Resources Goals 1, 3, and 6 would require detailed inventory of sensitive habitats including wetlands and riparian habitat prior to new development and protection of sensitive habitats that have been inventoried. Additionally, 2040 General Plan goals and policies would require preservation of wetland and riparian habitat, compliance with State and federal wetland regulations, and prohibition of specific development near riparian corridors. Therefore, impacts to riparian and wetland habitats would be less than significant.

Mitigation Measures

No mitigation measures required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Interfere substantially (i.e. direct/indirect reduction) with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

IMPACT BIO-4 DEVELOPMENT CARRIED OUT UNDER THE 2040 GENERAL PLAN WOULD LARGELY AVOID IMPACTS TO WILDLIFE MOVEMENT CORRIDORS BY CONSERVATION OF NATURAL AREAS CONTAINED IN POLICIES OF THE 2040 GENERAL PLAN. HOWEVER, THERE ARE NO SPECIFIC POLICIES PRESERVING WILDLIFE MOVEMENT CORRIDORS AND IMPACTS WOULD BE SIGNIFICANT BUT MITIGABLE.

Windsor supports a diversity of wildlife and creek channels that serve as wildlife movement corridors. Open space areas within the Town, such as Foothill Regional Park, provide discontinuous habitat blocks and patches, facilitating wildlife movement.

New growth and development under the 2040 General Plan would recognize the Town's natural resources and would occur where existing roads, water, and sewer are in place thus avoiding development in large open space areas that are used as wildlife corridors. The level of change that would result from the 2040 General Plan would not develop large open spaces within the Town that may be used as wildlife corridors because the 2040 General Plan focuses on infill development. In addition, the 2040 General Plan would preserve riparian corridors utilized by wildlife through specific goals and policies. The 2040 General Plan goals and policies, listed below, and Policies ER-1.1, -1.2, -1.7, -3.1, -3.2, -6.1, and -6.6 listed above would help to preserve natural habitat within the Town thus protecting wildlife corridors.

Environmental Resources Element Goals and Policies

Goal ER-1: Open Space. Preserve open space land for the continuation of commercial agricultural and productive uses, the protection and use of natural resources, the enjoyment of scenic beauty and recreation, and the protection from natural hazards.

Policy ER-1.4 *Open Space Regional Coordination*. The Town shall continue to encourage and coordinate with Sonoma County, the Sonoma County Agricultural Preservation and Open Space

District, and the Sonoma Land Trust in the preservation of open space resources outside the Town.

Implementation of the 2040 General Plan would preserve open space within the Town and protect sensitive habitats, thus preserving existing corridors used by wildlife through the policies ER-1.1, -1.2,-1.4, -1.7, -3.1, -3.2, -6.1, and -6.6. In addition, under Policy ER-1.4 the Town would coordinate with nearby jurisdictions to preserve habitat thus preserving not only local but regional wildlife movement corridors. Although the 2040 General Plan policies would preserve open space and protect sensitive habitats resulting in the protection of wildlife movement corridors, wildlife movement corridor protection is not a stated goal in the 2040 General Plan.

Mitigation Measures

The following mitigation measure is required.

BIO-2 Wildlife Movement Corridors Protection Policy

The 2040 General Plan Environmental Resources Element Policy ER-1.2 shall be updated to read:

> **Policy ER-1.2 *Sensitive Habitat Preservation*.** The Town shall encourage the preservation of sensitive environmental habitat areas, such as oak woodlands, productive farmlands, ~~and~~ riparian (creekside) corridors, and important wildlife movement corridors through measures such as clustering development and conservation easements.

Significance After Mitigation

Impacts would be less than significant with implementation of 2040 General Plan policies and Mitigation Measure BIO-2 to specify preservation of wildlife movement corridors in Policy ER-1.2.

Threshold:	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

IMPACT BIO-5 DEVELOPMENT PROPOSED BY THE 2040 GENERAL PLAN WOULD CONFORM WITH APPLICABLE LOCAL POLICIES PROTECTING BIOLOGICAL RESOURCES AND UNDERSCORE THEIR IMPORTANCE WITH STRENGTHENED POLICY STATEMENTS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Implementation of the 2040 General Plan would be subject to all applicable local policies and regulations related to the protection of important biological resources. Specifically, development under the 2040 General Plan would be required to comply with the Code of the Town of Windsor Chapter 27.36 – Tree Preservation and Protection. The ordinance provides standards for the preservation, protection, and maintenance of native oak trees and trees of significance, groves and stands of mature trees, and mature trees in general. The ordinance requires a tree removal permit and replacement plantings for any protected tree to be removed during project construction. In addition to requiring tree removal permits, the ordinance also requires measures to protect existing trees during project construction. The following 2040 General Plan policies from the Environmental Resources Element would help to protect the Town's trees in compliance with the Town's Ordinance Code: ER-1.2, -6.1, -6.2, -6.3, - 6.7, and -6.8.

The policies in the 2040 General Plan would preserve oak woodlands by restricting encroachments within the root zones of oak trees and requiring replacement if trees must be removed (Policy ER-6.7). In addition, trees would be protected during project construction by fencing the areas around

trees (Policy ER-6.8). Therefore, the 2040 General Plan would comply with applicable local regulations and impacts would be less than significant.

Mitigation Measures

No mitigation required.

Significance After Mitigation

Impacts to biological resources would be less than significant without mitigation.

Threshold:	Conflict with the provisions of an adopted Habitat Preservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

IMPACT BIO-6 WINDSOR IS LOCATED IN THE SANTA ROSA CONSERVATION STRATEGY PLANNING AREA THAT IDENTIFIES AREAS IN WINDSOR FOR PLANT CONSERVATION. IMPACTS TO AREAS IDENTIFIED IN THE SANTA ROSA CONSERVATION STRATEGY WOULD BE PROTECTED BY CONSERVATION STRATEGIES CONTAINED IN GOALS AND POLICIES OF THE 2040 GENERAL PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The General Plan Area is located within the planning area for the Santa Rosa Conservation Strategy (Conservation Strategy), which is overseen by the USFWS. The Conservation Strategy creates a long-term conservation program sufficient to mitigate potential adverse effects on listed species due to future development on the Santa Rosa Plain. Figure 13 of the Conservation Strategy designates Windsor Plant Conservation Areas in and around Windsor. The only plant conservation area identified in the General Plan Area is in the northwest portion of the Town (USFWS 2005). Figure 3 of the Conservation Strategy designates areas in the southern portion of the General Plan Area as having the potential for the presence of the California tiger salamander and listed plants. The figure also identifies several parcels in the eastern portion of the Town designated as not likely to contain California tiger salamander or listed plants. The 2040 General Plan prioritizes infill development in already urbanized areas of the Town. Therefore, areas of potential preservation as outlined in Figure 13 and Figure 3 of the Conservation Strategy are unlikely be developed. In addition, Goals ER-1, ER-3, and ER-6 and Policies ER-1.1, -1.2, -3.1, -3.2, -6.1, 6-.7, and -6.8 in the 2040 General Plan listed above promote conservation and protection of valuable habitat and sensitive resources. Therefore, conflicts with the Conservation Strategy would be less than significant.

Mitigation Measures

No mitigation is required.

Significance After Mitigation

Impacts to biological resources would be less than significant without mitigation.

4.5 Cultural Resources

The analysis in this section has been prepared in accordance with CEQA Guidelines Section 15064.5 and considers potential impacts to archaeological, historic, and paleontological resources. This section includes a brief summary of cultural resources background information and a review of known archaeological, paleontological, and built environment resources as well as the General Plan's potential impacts on these resources. Potential impacts to tribal resources are addressed in Section 4.16, *Tribal Cultural Resources*.

4.5.1 Setting

Regulatory Setting

Cultural resources, including built environment and archaeological resources, may be designated as historic by National, State or local authorities. In order for a resource to qualify for listing in the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR) or as a locally significant resource, it must meet one or more identified criteria of significance. The resource must also retain sufficient historic integrity, defined in *National Register Bulletin 15* as the "ability of a property to convey its significance" (National Park Service [NPS] 1990). An explanation of these designations follows.

California Environmental Quality Act

CEQA requires a lead agency to analyze whether historic and/or archaeological resources may be adversely impacted by a proposed project. Under CEQA, a "project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment" (California PRC Section 21084.1). Answering this question is a two-part process: first, the determination must be made as to whether or not the proposed project involves cultural resources; second, if cultural resources are present, the proposed project must be analyzed for a potential "substantial adverse change in the significance" of the resource.

With regards to paleontological resources, the *State CEQA Guidelines* (Article 1, §15002(a)(3)) state that CEQA is intended to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible. If paleontological resources are identified during the Preliminary Environmental Analysis Report, or other initial project scoping studies (e.g., Preliminary Environmental Study), as being within the proposed project area, the lead agency must take those resources into consideration when evaluating project effects. The level of consideration may vary with the importance of the resource.

California Register of Historical Resources

The California Register of Historical Resources (California Register) is a guide to cultural resources that must be considered when a government agency undertakes a discretionary action subject to CEQA. The California Register helps government agencies identify, evaluate, and protect California's historical resources, and indicates which properties are to be protected from substantial adverse change (Pub. Resources Code, Section 5024.1(a)). The California Register is administered through the State Office of Historic Preservation (SHPO) that is part of the California State Parks system.

A cultural resource is evaluated under four California Register criteria to determine its historical significance. A resource must be significant at the local, state, or national level in accordance with one or more of the following criteria set forth in the CEQA Guidelines Section 15064.5(a)(3):

1 It is associated with events that have made a significant contribution to the broad pattern of California's history and cultural heritage;

2 It is associated with the lives of persons important in our past;

3 It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

4 It has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of the above criteria, the California Register requires that sufficient time must have passed to allow a "scholarly perspective on the events or individuals associated with the resource." Fifty years is used as a general estimate of the time needed to understand the historical importance of a resource according to SHPO publications. The California Register also requires a resource to possess integrity, which is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association." Archaeological resources can sometimes qualify as "historical resources" (CEQA Guidelines, Section 15064.5(c)(1)).

According to CEQA, all buildings constructed over 50 years ago and that possess architectural or historical significance may be considered potential historical resources. Most resources must meet the 50-year threshold for historic significance; however, resources less than 50 years in age may be eligible for listing on the CRHR if it can be demonstrated that sufficient time has passed to understand their historical importance.

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

PRC, Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1 Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; or

2 Has a special and particular quality such as being the oldest of its type or the best available example of its type; or

3 Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Two other programs are administered by the state: California Historical Landmarks and California "Points of Historical Interest." California Historical Landmarks are buildings, sites, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value. California Points of Historical Interest are buildings, sites, features, or events that are of local (city or county)

significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value.

Impacts to significant cultural resources that affect the characteristics of any resource that qualify it for the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (CEQA Guidelines Section 15064.5 [b][1], 2000). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register… (CEQA Guidelines Section 15064.5[b][2][A]).

Codes Governing Human Remains

CEQA Guidelines Section 15064.5 also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. The disposition of human remains is governed by Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98, and falls within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified within 48 hours and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

Senate Bill 18

Enacted on March 1, 2005, Senate Bill 18 (SB18) (California Government Code Sections 65352.3 and 65352.4) requires cities and counties to notify and consult with California Native American tribal groups and individuals regarding proposed local land use planning decisions for the purpose of protecting traditional tribal cultural places (sacred sites), prior to adopting or amending a General Plan or designating land as open space. Tribal groups or individuals have 90 days to request consultation following the initial contact.

Assembly Bill 52

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, “tribal cultural resources.” Assembly Bill 52 establishes that “A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment” (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” and meets either of the following criteria:

a) 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

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of 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.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies consult with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if the tribe has requested notice of projects proposed within the jurisdiction of the lead agency.

Local Regulations

The Town of Windsor has a Historic Overlay zoning district (OH) that is applied to protect historic structures, sites, and areas that have special historic, architectural, or aesthetic interest or value. Any land use normally allowed in the primary zone may be allowed in the OH overlay, provided it is in compliance with the development standards for the historic overlay. Development standards in the overlay include: incorporation of the existing use into new development; encouraged reuse of architectural or historical buildings; compliance with Historic Conservation and Preservation Standards; and possible development proposal review and recommendations from the Northwest Information Center of the California Archaeological Inventory, Sonoma State University (section 27.16.050 of the Town Zoning Ordinance).

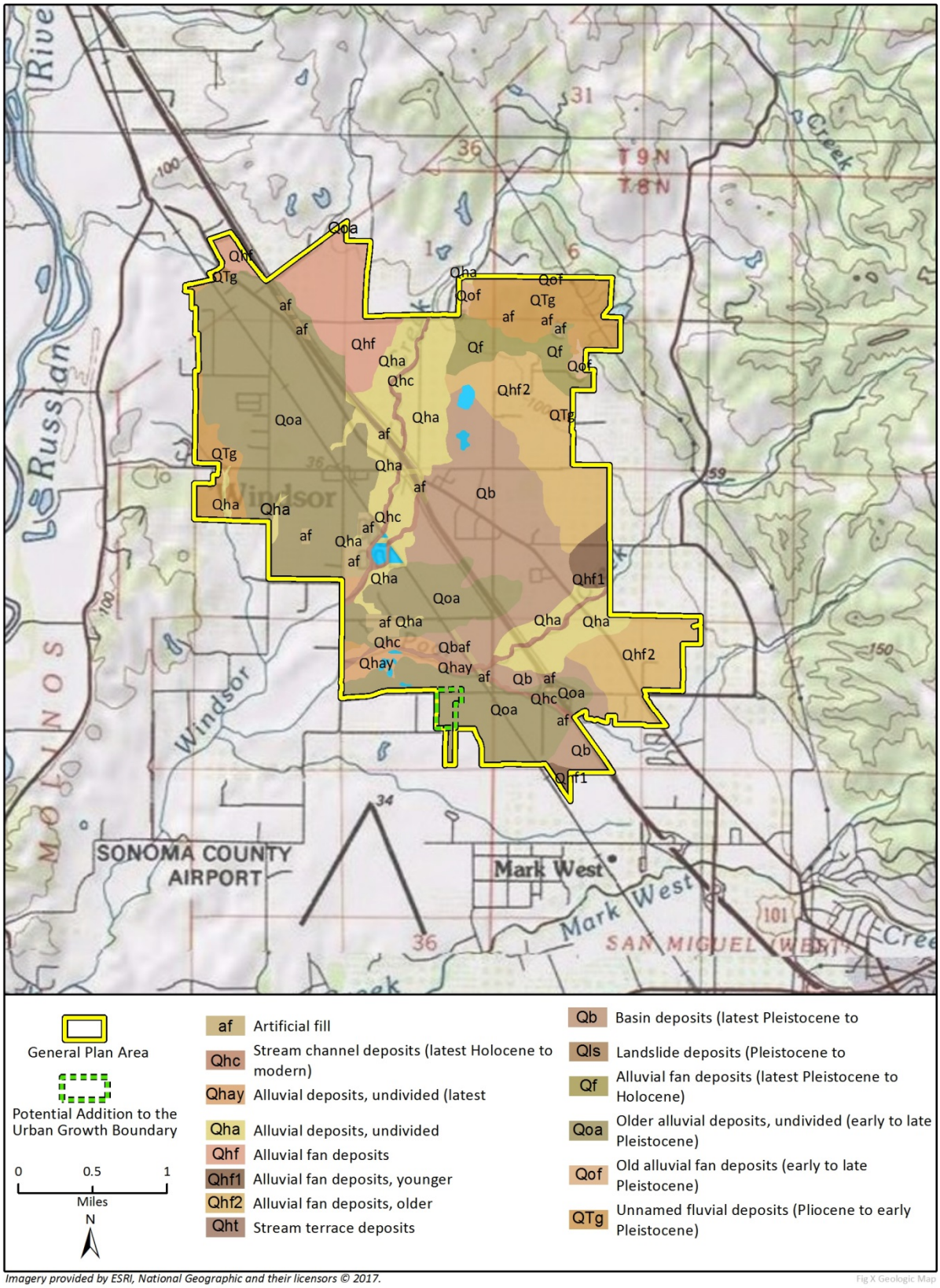
Paleontological Setting

Regional and Local Geology

The Santa Rosa Plain (the "Plain") is a large series of flat-lying areas and basins within Sonoma County (Valin and McLaughlin 2005). The Plain developed as a result of faulting and folding generated by transpression and rotation along the Pacific-North American plate margin, in relation to the northward migration of the Mendocino Triple Junction (Graymer et al. 2006; Lock et al. 2006). This plain is a northwest-southeast trending structural trough bounded by the Sebastopol Fault to the west and the Rodgers Creek and Healdsburg faults to the east. Surficial sediments in the Plain comprise mostly Quaternary alluvials and Quaternary to Pliocene gravels of the Glen Ellen Formation (Graymer et al. 2006; Sweetkind et al. 2010).

The Town of Windsor lies within a major sub-basin of the Santa Rosa Plain, the Windsor basin. The Windsor basin is underlain by Miocene to Recent, mostly terrestrial sediments, representing approximately the last 5 million years of geologic time (see Figure 9). Most of the subsurface of the Windsor basin consists of the Miocene to Pliocene marine, fossil-bearing Petaluma and Wilson Grove Formations (Wagner et al. 2011). As shown in Figure 9, neither of these formations crop out within the General Plan Area and are not considered further in this EIR (Delattre 2011; Delattre et al. 2008; Powell et al. 2004). The majority of surficial sediments in the Town of Windsor consist of Pleistocene to recent alluvium and alluvial fan deposits.

Figure 9 Geologic Map of the General Plan Area



Imagery provided by ESRI, National Geographic and their licensors © 2017.
Additional data provided by Delattre (2011); Delattre et al. (2008).

Fig X Geologic Map

Cultural Setting

Regional Prehistory

During the twentieth century, many archaeologists developed chronological sequences to explain prehistoric cultural changes within all or portions of northern California (c.f., Jones and Klar 2007:308-312; Moratto 1984:248-250). The Town of Windsor lies in the North Coast archaeological region (Moratto 1984: Figure 1). Following Milliken et al. (2007:101-103), the prehistoric cultural chronology for the North Coast can be generally divided into five periods: the Early Holocene (8,000-3,500 B.C.), Early Period (3,500-500 B.C.), Lower Middle Period (500 B.C. to A.D. 430), the Upper Middle Period (A.D. 430-1050), and the Late Period (A.D. 1050-European contact).

It is presumed that early Paleoindian groups lived in the area prior to 8,000 B.C. However, no evidence for that period has been discovered in the North Coast to date (Milliken et al. 2007:114). Because sea level was much lower prior to 8,000 B.C., it is likely that any such sites may now be underwater. For this reason, the terminal Pleistocene to earliest Holocene Period (ca. 11,700-8,000 B.C.) is not discussed here.

Early Holocene (8,000-3,500 B.C.)

The Early Holocene in the North Coast is characterized by a mobile forager pattern and the presence of millingslabs, handstones, and a variety of leaf-shaped projectile points, though evidence for this period is limited. It is likely that Holocene alluvial deposits buried many prehistoric sites in the area (Ragir 1972).

Early Period (3,500-600 B.C.)

The Early Period saw increased sedentism from the Early Holocene as indicated by new ground stone technologies (introduction of the mortar and pestle), an increase in regional trade, and the earliest cut-bead horizon. By 1,500 B.C., mortars and pestles had almost completely replaced millingslabs and handstones. A shift to a sedentary or semi-sedentary lifestyle is marked by the prevalence of mortars and pestles, ornamental grave associations, and shell mounds. The earliest cut bead horizon, dating to this period, is represented by rectangular *Haliotis* (abalone) and *Olivella* (snail) beads from several sites (Milliken et al. 2007:114-115). The advent of the mortar and pestle indicate a greater reliance on processing nuts such as acorns. Faunal evidence from various sites indicates a diverse diet based on mussel and other shellfish, marine mammals, terrestrial mammals, and birds (D'Oro 2009).

Lower Middle Period (500 B.C.-A.D. 430)

The Lower Middle Period saw numerous changes from the previous period. Rectangular shell beads, common during the Early Period, disappear completely and are replaced by split-beveled and saucer *Olivella* beads. In addition to the changes in beads, *Haliotis* ornaments, bone tools and ornaments, and basketry awls indicating coiled basketry manufacture appeared. Mortars and pestles continued to be the dominant grinding tool (Milliken et al. 2007:115).

Upper Middle Period (A.D. 430-1050)

Around A.D. 430, *Olivella* saucer bead trade networks established during earlier periods collapsed and over half of known sites occupied during the Lower Middle Period were abandoned. *Olivella* saucer beads were replaced with *Olivella* saddle beads. New items appear at sites, including

elaborate, decorative blades, fishtail charmstones, new *Haliotis* ornament forms, and mica ornaments. Sea otter bones became more frequent from earlier periods (Milliken et al. 2007:116). Subsistence analysis at various sites dating to this period indicate a diverse diet that included various species of fish, mammal species, bird species, shellfish, and plant resources that varied by location (Hylkema 2002).

Late Period (A.D. 1050-contact)

The Late Period saw an increase in social complexity, indicated by differences in burials, and an increased level of sedentism relative to preceding periods. Small, finely worked projectile points associated with bow and arrow technology appear around A.D. 1250. *Olivella* shell beads disappeared and were replaced with clamshell disk beads. The toggle harpoon, hopper mortar, and magnesite tube beads also appeared during this period (Milliken et al. 2007:116-117). This period saw an increase in the intensity of resource exploitation that correlates with an increase in population. Many of the sites occupied in earlier periods were abandoned, possibly due to fluctuating climate and drought that occurred throughout the Late Period (Lightfoot and Luby 2002).

Ethnographic Background

The General Plan Area was historically occupied by the Pomo, who were semi-sedentary, with a settlement system characterized by both permanent villages and seasonal specialized camps (Bean and Theodoratus 1978:289). The Pomo organized socially around tribelets, which were composed of extended kin groups, each with a headman or minor chief (Bean and Theodoratus 1978:293).

Pomo subsistence was based on hunting, gathering, and fishing, with acorns, buckeyes, and kelp especially used (Bean and Theodoratus 1978:290). Terrestrial mammals were also important; bears, elk, and were hunted by the men. Like the rest of California, the acorn was an important staple and was prepared by leaching acorn meal both in openwork baskets and in holes dug into the sand.

One Franciscan mission was built within Pomo territory in 1823; the last mission in California, San Francisco de Solano. Much of the Southern Pomo population had already declined by the time of this final mission, either from prior missionization, Mexican slave raiding, disease, and the increasing appearance of European settlers (McLendon and Oswalt 1978:279). In 1976, only a handful of remaining Pomo could speak a Pomoan language, and most of these originated north of Healdsburg (i.e., north of the Town of Windsor) (McLendon and Oswalt 1978:279).

Regional History

Spanish Period (1769-1822)

For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta (upper) California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968:16-56; Rolle 2003:20-39). In 1579, Francis Drake landed in what was most likely San Francisco Bay. In 1595, Sebastian Cermeño landed in Drake's Bay before returning south (Bean 1968:22).

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

began his expedition, reaching the San Francisco Bay Area and exploring the region in 1772 (Bean 1968)

In 1770, the mission and presidio at Monterey were founded and three years later Juan Bautista de Anza proposed to open a land route from Sonora to Monterey. The viceroy at the time, Antonio de Bucareli, sanctioned Anza's expedition and proposed he extend it to form a settlement at the bay of San Francisco. Anza's first expedition traveled from Mexico City to Monterey. During this time, various sea expeditions from Monterey discovered Nootka Sound, the Columbia River, and the Golden Gate. Anza's second expedition began in 1775 leading to the establishment of the presidio and mission at San Francisco, Mission Dolores, approximately 60 miles south of the Town of Windsor (Bean 1968:43-44). Spanish colonial activity in the Bay Area concentrated on Mission Dolores and the presidio. Mission San Francisco Solano, the mission nearest the Town of Windsor, approximately 25 miles to the south, was founded in in the following Mexican Period in 1823 (California Mission Resource Center 2016).

Mexican Period (1822-1848)

The Mexican Period commenced when news of the success of the Mexican Revolution (1810-1821) against the Spanish crown reached California in 1822. This period saw the privatization of mission lands in California with the passage of the Secularization Act of 1833. This Act enabled Mexican governors in California to distribute mission lands to individuals in the form of land grants. Successive Mexican governors made more than 700 land grants between 1822 and 1846, putting most of the state's lands into private ownership for the first time (Shumway 2006). Ranch Sotoyome includes the northwestern corner of the Town and was granted to Henry D. Fitch in 1841.

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

American Period (1848-Present)

The American Period officially began with the signing of the Treaty of Guadalupe Hidalgo in 1848, in which the United States agreed to pay Mexico $15 million for the conquered territory, which included California, Nevada, Utah, and parts of Colorado, Arizona, New Mexico, and Wyoming. Settlement of California continued to increase during the early American Period. Many ranchos in the county were sold or otherwise acquired by Americans, and most were subdivided into agricultural parcels or towns. Rancho El Molino, which includes the western edge of the Town, was granted to John B. R. Cooper in 1858.

The discovery of gold in northern California in 1848 led to the California Gold Rush (Guinn 1977; Workman 1936:26) and California's population grew exponentially. During this time, San Francisco became California's first true city, growing from a population of 812 to 25,000 in only a few years (Rolle 2003:113).

Town of Windsor

Settlement of the region that would become the Town of Windsor began around 1851, with the arrival of residents relocating from the eastern United States and Europe. One of the region's

earliest prominent residents, Henry Bell, arrived in 1852 and purchased 160 acres of land in the area, on which Windsor later developed (Town of Windsor n.d.). The town was said to have been given its name in 1855 by Hiram Lewis, who compared the area's pastoral beauty to the grounds surrounding Windsor Castle in his native country of England. That year, a post office was established in the town, and Lewis became the first acting postmaster (Town of Windsor n.d.).

The commercial core of the town was first located on the east side of the main road between Santa Rosa and Healdsburg. In 1856 the town center consisted of blacksmiths' shops, a dry goods store, a grocery and meat market, a saloon, a hotel and barroom, a boarding house, confectionary shops, and a shoe shop. The railroad arrived in the area in 1872, passing through the west end of town. Local farmers benefitted from the new mode of transportation and new markets opened to them, thus increasing the amount of crops cultivated (Town of Windsor n.d.). However, the arrival of the railroad also created a schism in the community as some of the townspeople wanted to relocate the town center to the west to be near the railroad line, while others wanted it to remain on the east side. The community split into East Windsor and West Windsor, and it would be many years before the community reunited (Town of Windsor n.d.).

Early in the 20th century, some of Windsor's buildings were damaged or lost in two separate disasters: a fire in 1905, followed by the San Francisco earthquake the next year. A telephone system and electricity were brought to the town by 1911. The Old Redwood Highway, one of the area's dirt roads, was paved in 1915 using horse-drawn equipment and teams of laborers, who camped in Windsor (The Town of Windsor, n.d.)

In 1942 the United States Army took over a property on which Sonoma County had developed a runway and expanded it to become the Santa Rosa Army Airfield, which was used primarily to train fighter groups and squadrons. At its peak, 300 to 500 aircraft and 10,000 personnel were based at the army airfield. The property converted back to a civil facility with the county resuming its operation in 1946 (Charles M. Schulz Sonoma County Airport 2011). Also during World War II, a prisoner-of-war (POW) camp was established west of downtown Windsor and was reported to hold German POWs captured from submarine crews and members of the Africa Corp. The POWs were put to work on local farms and were under lax surveillance, as the men were known to venture into local bars and towns such as Santa Rosa for the day. The camp closed shortly after the war ended (The Town of Windsor, n.d.).

The Town of Windsor remained mostly agricultural until approximately 1980 when it experienced dramatic economic and population growth, as well as increased residential development. The Town of Windsor formally incorporated in 1992 (The Town of Windsor, n.d.). Today, the Town of Windsor has approximately 27,000 residents and encompasses approximately 7.3 square miles of land (United States Census Bureau, 2016).

Previously Identified Cultural and Paleontological Resources

Cultural Resources

According to the Office of Historic Preservation, no resources listed on the California Register of Historical Resources, the California Historical Landmarks, or the California Points of Historical Interest are located within the Town of Windsor (OHP 2017). One resource, the James H. and Frances E. Laughlin House, is listed on the National Register of Historic Places. As shown in Table 13, the Town of Windsor Historical Register lists nine cultural resources.

Table 13 Town of Windsor Historical Register Listings

Resource Name	Location
Masonic Hall	371 Windsor River Road
Gutchell House/Residence	321 Windsor River Road
Hembree House	9225 Foxwood Drive
Cunningham House	9229 Foxwood Drive
Bell Ranch House	294 Windsor River Road
Heritage Bay Tree	Foothill Drive/Cerrada Court
Shiloh Cemetery	7100 Windsor Road
David H. Duvander House	295 Windsor River Road
Odd Fellows Hall	337 Windsor River Road

Source: Town of Windsor Historic Register, 2017

Paleontological Resources

Paleontological resources (fossils) are the remains and/or traces of prehistoric life. Fossils are typically preserved in layered sedimentary rocks and the distribution of fossils is a result of the sedimentary history of the geologic units within which they occur. Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on a number of factors. Although it is not possible to determine whether a fossil will occur in any specific location, it is possible to evaluate the potential for geologic units to contain scientifically significant paleontological resources, and therefore evaluate the potential for impacts to those resources, and provide mitigation for paleontological resources if they do occur during construction.

The Town of Windsor is underlain by Miocene to Recent, mostly terrestrial sediments, representing approximately the last 5 million years of geologic time (see Table 14 and Figure 9). No formal museum searches were conducted for this project, but online fossil collections data from the University of California Museum of Paleontology (UCMP) and the Neogene Mammal Mapping Portal (NEOMAP) were accessed. These database searches revealed 556 fossil localities within Sonoma County, 26 of which contain vertebrates. Most of these vertebrate localities (N=15) derive from the Petaluma, Merced, Glen Ellen, and Wilson Grove formations, none of which are mapped within the General Plan Area. The remaining localities (N=13) derive from various locations in Sonoma County, but not within the General Plan Area (Parkman 2006). Because the Town of Windsor apparently has no records of fossil discoveries within its boundaries, paleontological sensitivities of geologic units presented here follow standard conventions as outlined by the Society of Vertebrate Paleontology (2010).

According to the Sonoma County General Plan EIR, paleontological remains are fairly common in Sonoma County and have been most often recovered from three geologic formations: the Franciscan complex, the Wilson Grove Formation, and the Sonoma Volcanics (Blake et al. 2002; Delattre et al. 2008; Delattre 2011). None of these occur within the Town of Windsor General Plan Area (Figure 9). However, given the prevalence of Pleistocene and older sediments within Town

boundaries and the statewide productivity of Pleistocene and older sediments in general, any sediments of this age should be considered to have high potential to yield fossils wherever they occur.

Table 14 Geologic Units within the Plan Area

Geologic Unit*	Age	Notes	Paleontological Sensitivity (SVP)
Artificial fill (af)	Modern (historical)	Human made fill materials	No
Stream channel deposits (Qhc)	Latest Holocene to modern	Terrestrial sediments	No
Undivided, young alluvium (Qhay)	Latest Holocene	Terrestrial sediments	No
Undivided alluvium (Qha)	Holocene	Terrestrial sediments	Low
Younger alluvial fan deposits (Qhf: Qhf1, Qhf2)	Holocene	Terrestrial sediments	Low
Stream terrace deposits (Qht)	Holocene	Terrestrial sediments	Low
Basin deposits (Qb)	Latest Pleistocene to Holocene	Terrestrial sediments	High
Landslide deposits (Qls)	Pleistocene to historical	Terrestrial sediments	Low
Older alluvial fan deposits (Qf)	Latest Pleistocene to Holocene	Terrestrial sediments	High
Older alluvial deposits, undivided (Qoa)	Early to late Pleistocene	Terrestrial sediments	High
Old alluvial fan deposits (Qof)	Early to late Pleistocene	Terrestrial sediments	High
Unnamed fluvial deposits (QTg)	Pliocene to early Pleistocene	Terrestrial sediments	High

*Source: Delattre (2011); Delattre et al. (2008).

4.5.2 Impact Analysis

Methodology and Significance Thresholds

Cultural Resources

Under CEQA, any project that may cause a substantial adverse change in the significance of a historical resource would also have a significant effect on the environment. According to Appendix G of the *State CEQA Guidelines*, impacts related to cultural resources from the proposed project would be significant if the project would:

1 Cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5

2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5

3 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature of paleontological or cultural value

4 Disturb any human remains, including those interred outside of dedicated cemeteries

The significance of a cultural resource and subsequently the significance of any impact is determined by among other things, consideration of whether or not that resource can increase our knowledge of the past. The determining factors are site content and degree of preservation. A finding of archaeological significance follows the criteria established in the *State CEQA Guidelines*.

CEQA Guidelines Section 15064.5 (Determining the Significance of Impacts to Archaeological Resources) states:

> (3) […] Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852).
>
> (4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.
>
> (b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Historical resources are "significantly" affected if there is demolition, destruction, relocation, or alteration of the resource or its surroundings. Generally, impacts to historical resources can be mitigated to below a level of significance by following the Secretary of the Interior's Guidelines for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings [Guidelines § 15064.6(b)]. In some circumstances, documentation of an historical resource by way of historic narrative photographs or architectural drawings will not mitigate the impact of demolition below the level of significance [Guidelines § 15126.4(b)(2)]. Preservation in place is the preferred form of mitigation for archaeological resources as it retains the relationship between artifact and context, and may avoid conflicts with groups associated with the site [Guidelines § 15126.4 (b)(3)(A)]. If an archaeological resource does not meet either the historic resource or the more specific "unique archaeological resource" definition, impacts do not need to be mitigated [Guidelines § 15064.5(e)]. Where the significance of a site is unknown, it is presumed to be significant for the purpose of the EIR investigation.

Paleontological Resources

Paleontological sensitivity refers to the potential for a geologic unit to produce scientifically significant fossils. Direct impacts to paleontological resources occur when earthwork activities, such as grading or trenching, cut into the geologic deposits (formations) within which fossils are buried and physically destroy the fossils. Since fossils are the remains of prehistoric animal and plant life, they are considered to be nonrenewable. Such impacts have the potential to be significant and, under the California Environmental Quality Act (CEQA) guidelines, may require mitigation. Sensitivity is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological sensitivity is derived from the known fossil data collected from the entire geologic unit, not just from a specific survey.

The discovery of a vertebrate fossil locality is of greater significance than that of an invertebrate fossil locality, especially if it contains a microvertebrate assemblage. The recognition of new vertebrate fossil locations could provide important information on the geographical range of the taxa, their radiometric age, evolutionary characteristics, depositional environment, and other important scientific research questions. Vertebrate fossils are almost always significant because they occur more rarely than invertebrates or plants. Thus, geological rock units having the potential to contain vertebrate fossils are considered the most sensitive.

The Society of Vertebrate Paleontology (SVP) outlines in their Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP 2010) guidelines for categorizing paleontological sensitivity of geologic units within a project area. The SVP (2010) describes sedimentary rock units as having a high, low, undetermined, or no potential for containing significant nonrenewable paleontological resources. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. Significant paleontological resources are fossils or assemblages of fossils, which are unique, unusual, rare, uncommon, diagnostically or stratigraphically important, and those which add to an existing body of knowledge in specific areas, stratigraphically, taxonomically, or regionally. While these standards were specifically written to protect vertebrate paleontological resources, all fields of paleontology have adopted these guidelines. Rincon has evaluated the paleontological sensitivity of the Plan Area according to the following SVP (2010) categories; the results are discussed below:

High Potential (Sensitivity)

Rock units from which significant vertebrate or significant invertebrate fossils or significant suites of plant fossils have been recovered are considered to have a high potential for containing significant non-renewable fossiliferous resources. These units include but are not limited to: sedimentary formations and some volcanic formations which contain significant nonrenewable paleontological resources anywhere within their geographical extent and sedimentary rock units temporally or lithologically suitable for the preservation of fossils. Sensitivity comprises both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, or botanical and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, ecologic, or stratigraphic data. Areas which contain potentially datable organic remains older than Recent, including deposits associated with nests or middens, and areas which may contain new vertebrate deposits, traces, or trackways are also classified as significant.

Low Potential (Sensitivity)

Sedimentary rock units that are potentially fossiliferous, but have not yielded fossils in the past or contain common and/or widespread invertebrate fossils of well documented and understood taphonomic, phylogenetic species and habitat ecology. Reports in the paleontological literature or field surveys by a qualified vertebrate paleontologist may allow determination that some areas or units have low potentials for yielding significant fossils prior to the start of construction. Generally, these units will be poorly represented by specimens in institutional collections and will not require protection or salvage operations. However, as excavation for construction gets underway it is possible that significant and unanticipated paleontological resources might be encountered and would require a change of classification from Low to High Potential and, thus, require monitoring and mitigation if the resources are found to be significant.

Undetermined Potential (Sensitivity)

Specific areas underlain by sedimentary rock units for which little information is available are considered to have undetermined fossiliferous potentials. Field surveys by a qualified vertebrate paleontologist to specifically determine the potentials of the rock units are required before programs of impact mitigation for such areas may be developed.

No Potential

Rock units of metamorphic or igneous origin are commonly classified as having no potential for containing significant paleontological resources.

In general terms, for geologic units with high sensitivity, full-time monitoring typically is recommended during any project-related ground disturbance. For geologic units with low sensitivity, protection or salvage efforts typically are not required. For geologic units with undetermined sensitivity, field surveys by a qualified paleontologist are usually recommended to specifically determine the paleontological potential of the rock units present within the study area. For geologic units with no sensitivity, a paleontological monitor is not required.

Paleontological Sensitivity of Geologic Units within the Plan Area

As mentioned above, the Town of Windsor is underlain by Miocene to Holocene, mostly terrestrial sediments, representing approximately the last 5 million years of geologic time (Figure 9). There is also a fair amount of artificial fill. The artificial fill is entirely human-introduced and has no paleontological potential. Late Holocene deposits are too young to contain fossils and so have no paleontological potential (SVP 2010). However, these sediments likely overlie older, paleontologically sensitive sediments, but at unknown depths. The undifferentiated Holocene and Pleistocene to historical landslide deposits have some potential to contain fossils, but are generally considered to have low potential, because of their highly disturbed context.

The Town contains large areas of Pleistocene, or older, alluvium. Pleistocene alluvium represents terrestrial stream-laid deposits of undivided gravel, sand, and silt deposited before the end of the last Ice Age (ca. 11,700 years ago) and has a record of abundant and diverse vertebrate fauna throughout California, including northern California (Agenbroad 2003; Bell et al. 2004; Jefferson 1985, 1991; Maguire and Holroyd 2016; Merriam 1911; Reynolds et al. 1991; Savage et al. 1954; Scott and Cox 2008; Springer et al. 2009; Tomiya et al. 2011; Wilkerson et al. 2011; Winters 1954) and is generally considered to have high paleontological sensitivity wherever it occurs as shown in Figure 10.

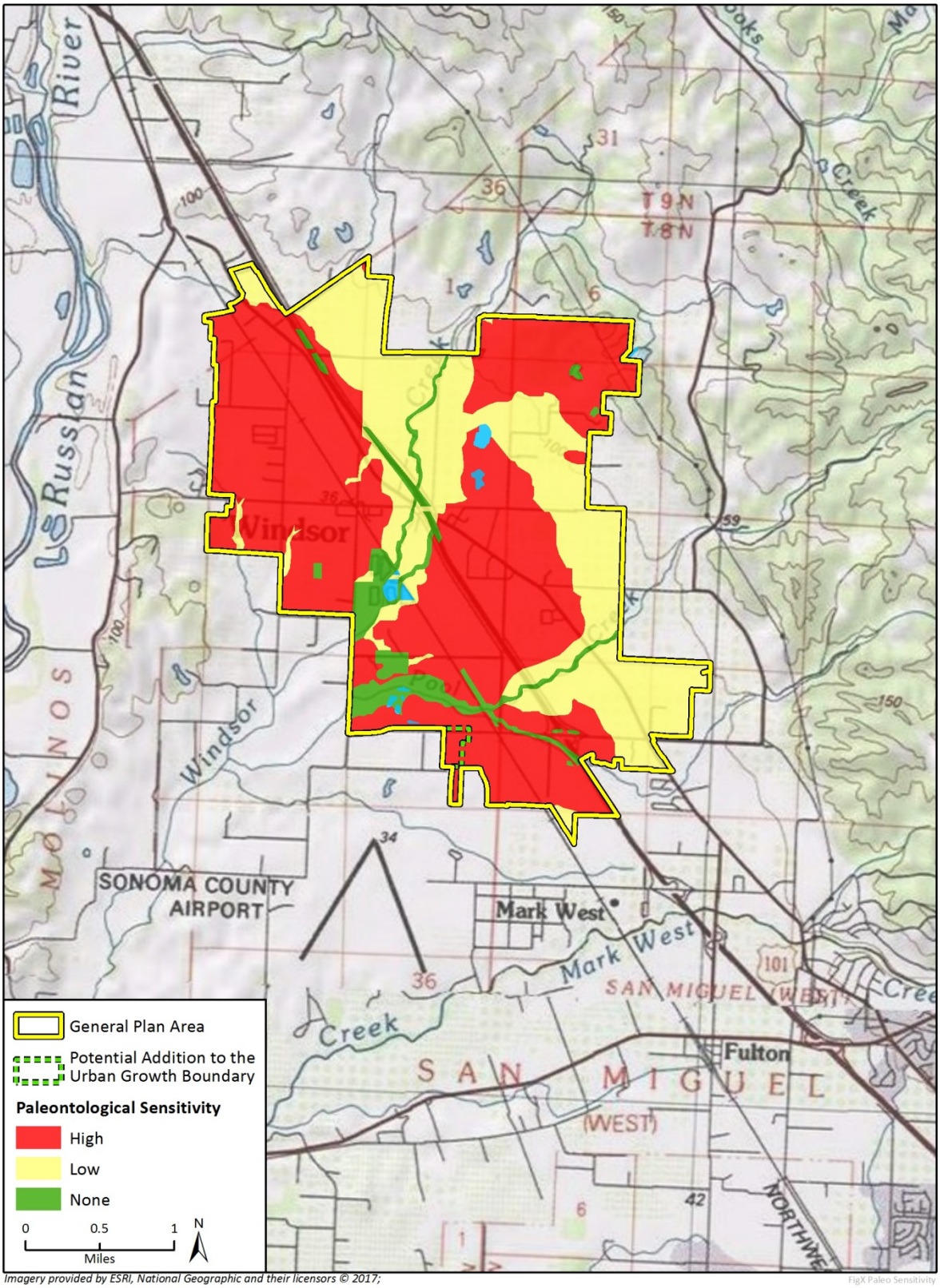
Project Impacts and Mitigation Measures

Threshold:	Cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5 or cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

IMPACT CR-1 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN HAS THE POTENTIAL TO IMPACT HISTORICAL AND UNIQUE ARCHAEOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Based on CEQA Guidelines Section 15064.5, the 2040 General Plan– and future development activities facilitated by the plan – would have a significant impact on historical resources if it would cause a substantial adverse change in the significance of a historical resource. Historical resources include properties eligible for listing on the National Register of Historic Places, the California Register of Historic Resources, or the local register of historical resources. In addition, as explained in Section 15064.5, "[s]ubstantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

Figure 10 Paleontological Sensitivity of Geologic Units within the General Plan Area



Although there are no specific development projects associated with the General Plan, implementation of the plan would guide development in the General Plan Area though the year 2040. Development under the proposed General Plan could affect known or unknown historic resources. Mitigation Measure CR-1 require the addition of an implementation program outlining the specific steps required to identify and address impacts to historic resources to the 2040 General Plan.

Effects on archaeological resources are only knowable once a specific project has been proposed because the effects are highly dependent on both the individual project site conditions and the characteristics of the proposed ground-disturbing activity. Ground-disturbing activities associated with development facilitated by the 2040 General Plan, particularly in areas that have not previously been developed with urban uses, have not been studied through a cultural resources investigation, or when excavation depths exceed those previously attained, have the potential to damage or destroy previously-unknown historic or prehistoric archaeological resources that may be present on or below the ground surface. Consequently, damage to or destruction of previously-unknown sub-surface cultural resources could occur as a result of development under the proposed General Plan. In order to ensure that development within the Town of Windsor does not have a detrimental effect on archaeological resources, each project will need to be assessed as it is proposed.

The General Plan includes policies and implementation programs to protect cultural resources, including requiring avoidance where feasible (Policy ER-7.2, Implementation Program ER-13). The General Plan further requires that all discretionary proposals consider the potential to disturb significant cultural resources and that where such resources may exist that further survey and evaluation be performed by a qualified professional (Policy ER-7.10).

Environmental Resources Element Goals, Policies, and Implementation Programs

Goal ER-7: Cultural Resources. Identify and preserve significant cultural or historical sites or structures by promoting public awareness of and support for historic preservation.

> **Policy ER-7.2** ***Protection of Archeological and Historical Resources*****.** The Town shall strive to ensure that significant archaeological and historical resources are adequately identified and protected from destruction, through avoidance where feasible. Where resources are encountered after development begins, the developer shall prepare an assessment of appropriate actions to preserve or remove the resources, subject to review and approval of the actions by the Town. Where such resources are Native American, the developer shall prepare the assessment in consultation with appropriate Native America tribe(s).
>
> **Policy ER-7.10** ***Historic and Cultural Development Review*****.** The Town shall require all discretionary proposals to consider the potential to disturb significant prehistoric and historic resources. If the preliminary reconnaissance suggests that significant resources or tribal cultural resources may exist, further survey and evaluation will be performed by a qualified professional. Where such resources are Native American, the appropriate Native American tribe(s) will participate with the qualified professional. Mitigation measures shall be required for any significant impacts identified for important cultural resources. Where tribal resources are involved, further consultation with the appropriate tribe(s) is required under AB52. These measures shall comply with the California Environmental Quality Act.
>
> **Implementation Program ER-13** ***Preservation of Resources and Artifact and Data Recovery***. The Town shall establish policies and procedures which would support preservation in

place/avoidance as the preferred method of mitigation for impacted cultural resources. Where such preservation and avoidance is not possible, the Town shall require that any artifacts collected or recovered as a result of cultural resources investigations be catalogued, that the Native American tribe with which the artifact is associated be consulted, and that the artifact be preserved at the direction of both the Native American tribe and the lead agency heading the investigation per Senate Bill 18 (SB18) and Assembly Bill 52 (AB52).

Mitigation Measure CR-1 requires the addition of an implementation program that outlines specific steps to identify cultural resources on a project-by-project basis, which would further reduce potential impacts to cultural resources.

Mitigation Measures

The following Mitigation Measures are ~~is~~ required.

CR-1 Cultural Resources Study Implementation Program

The following Implementation Program shall be added to the 2040 General Plan:

If the preliminary reconnaissance required under Policy ER-7.10 suggests that significant historic resources, cultural resources, or tribal cultural resources may exist or for any other project requiring discretionary approval where there will be substantial ground disturbance by the project, the applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in archaeology and/or an architectural historian meeting the SOI PQS standards in architectural history to complete a Phase 1 cultural resources inventory of the project site (NPS 1983). A Phase 1 cultural resources inventory should include a pedestrian survey of the project site and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC). The technical report documenting the Phase 1 cultural resources inventory shall include recommendations to avoid or reduce impacts to cultural resources.

CR-2 Tribal Cultural Resource Consultation

Mitigation Measure CR-1 shall apply to all discretionary projects. Where potential tribal cultural resources are encountered or revealed through the Phase 1 Survey, the Town will consult with applicable tribe(s) to determine appropriate measures for addressing the resources.

Significance After Mitigation

The implementation of Mitigation Measure CR-1 would reduce impacts to historical and unique archeological resources to a less than significant level by including an implementation program requiring cultural resource studies for projects within the Town and implementation of further requirements to avoid or reduce impacts to such resources on a project-by-project basis. In addition Mitigation Measure CR-2 would further reduce impacts to cultural resources by requiring tribal consultation for all discretionary projects.

Threshold:	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature of paleontological or cultural value.

IMPACT CR-2 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN HAS THE POTENTIAL TO IMPACT PALEONTOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Paleontological resources may be present in fossil-bearing sediments and geologic units either at or below the ground surface. Ground-disturbing activities in geologic units with high paleontological sensitivity have the potential to damage or destroy paleontological resources that may be present. Therefore, activities resulting from implementation of the proposed General Plan, including construction-related and earth-disturbing actions, could damage or destroy fossils in these geologic units resulting in a significant impact.

As with cultural resources, effects on paleontological resources are only knowable once a specific project has been proposed because the effects are highly dependent on both the individual project site conditions (in this case, the geologic setting) and the characteristics of the proposed ground-disturbing activity. Ground-disturbing activities associated with development facilitated by the 2040 General Plan, particularly in areas that have not previously been developed with urban uses, have not been studied through a paleontological resources investigation, or when excavation depths exceed those previously attained, have the potential to damage or destroy paleontological resources that may be present on or below the ground surface, especially in areas mapped as high paleontological sensitivity (Figure 10). Consequently, damage to or destruction of fossils could occur as a result of development under the proposed General Plan. In order to ensure that development within the Town of Windsor does not have a detrimental effect on fossils, each project will need to be assessed as it is proposed.

There are currently no policies within the 2040 General Plan to protect paleontological resources. Therefore, impacts to paleontological resources associated with implementation of the 2040 General Plan are potentially significant.

Mitigation Measures

The following Mitigation Measures is required.

CR-~~2~~3 Paleontological Resource Studies

The following Implementation Program shall be added to the 2040 General Plan:

> For any development in Windsor that occurs within high sensitivity geologic units, whether they are mapped at the surface or hypothesized to occur in the subsurface, the Town shall require a paleontological assessment, and avoidance and/or mitigation for potential impacts to paleontological resources. The Town shall require the following specific requirements for projects that could disturb geologic units with high paleontological sensitivity, whether they are mapped at the surface or hypothesized to occur in the subsurface.
>
> 1. **Retain a Qualified Paleontologist**. Prior to initial ground disturbance within highly sensitive geologic units, the applicant shall retain a project paleontologist, defined as a paleontologist who meets the SVP (2010) standards for Qualified Professional Paleontologist, to direct all mitigation measures related to paleontological resources. A qualified paleontologist (Principal Paleontologist) is defined by the SVP standards as an individual with an M.S. or

Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least one year.

2. **Paleontological Mitigation and Monitoring Program.** Prior to construction activity a qualified paleontologist should prepare a Paleontological Mitigation and Monitoring Program to be implemented during ground disturbance activity for the proposed project. This program should outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological staff qualifications.
3. **Paleontological Worker Environmental Awareness Program (WEAP).** Prior to the start of construction, the project paleontologist or his or her designee, shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be fulfilled at the time of a preconstruction meeting at which a qualified paleontologist shall attend. In the event of a fossil discovery by construction personnel, all work in the immediate vicinity of the find shall cease and a qualified paleontologist shall be contacted to evaluate the find before restarting work in the area. If it is determined that the fossil(s) is(are) scientifically significant, the qualified paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources.
4. **Paleontological Monitoring.** Ground disturbing construction activities (including grading, trenching, foundation work and other excavations) at the surface in areas mapped as high paleontological sensitivity and exceeding 5 feet in depth in areas overlying potentially high paleontological sensitivity units should be monitored on a full-time basis by a qualified paleontological monitor during initial ground disturbance. The Paleontological Mitigation and Monitoring Program shall be supervised by the project paleontologist. Monitoring should be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources. The duration and timing of the monitoring will be determined by the project paleontologist. If the project paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring would be reinstated if any new or unforeseen deeper ground disturbances are required and reduction or suspension would need to be reconsidered by the Supervising Paleontologist. Ground disturbing activity that does not occur in areas mapped as high sensitivity or that do not exceed 5 feet in depth in areas overlying potentially high sensitivity units would not require paleontological monitoring.
5. **Salvage of Fossils.** If significant fossils are discovered, the project paleontologist or paleontological monitor should recover them. Typically fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist should have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Work may continue outside of a buffer zone around the fossil, usually 50-100 feet (specific distance may be determined by the project paleontologist).

6. **Preparation and Curation of Recovered Fossils. Once** salvaged, significant fossils should be identified to the lowest possible taxonomic level, prepared to a curation-ready condition and curated in a scientific institution with a permanent paleontological collection (such as the University of California Museum of Paleontology), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist.
7. **Final Paleontological Mitigation Report.** Upon completion of ground disturbing activity (and curation of fossils if necessary) the qualified paleontologist should prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report should include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.

Significance After Mitigation

The implementation of Mitigation Measure CR-2 would reduce impacts to paleontological resources to a less than significant level by including an implementation program requiring paleontological resource studies for projects in high sensitivity geological units within the Town and implementation of further requirements to avoid or reduce impacts to such resources on a project-by-project basis.

Threshold:	Disturb any human remains, including those interred outside of dedicated cemeteries.

IMPACT CR-3 GROUND-DISTURBING ACTIVITIES ASSOCIATED WITH DEVELOPMENT UNDER THE PROPOSED 2040 GENERAL PLAN COULD RESULT IN DAMAGE TO OR DESTRUCTION OF HUMAN BURIALS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Human burials outside of formal cemeteries often occur in prehistoric archeological contexts. Although much of the Town is built out, the potential still exists for these resources to be present. Excavation during construction activities in the Town would have the potential to disturb these resources, including Native American burials.

Human burials, in addition to being potential archaeological resources, have specific provisions for treatment in Section 5097 of the California Public Resources Code. The California Health and Safety Code (Sections 7050.5, 7051, and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains, and protects them from disturbance, vandalism, or destruction, and established procedures to be implemented if Native American skeletal remains are discovered. Public Resources Code §5097.98 also addresses the disposition of Native American burials, protects such remains, and established the NAHC to resolve any related disputes.

The Genera Plan requires compliance with existing regulations relating to the treatment of human remains in Policy ER-7.4, stated below, thus no mitigation is required.

Environmental Resources Element Policies

Policy ER-7.4 ***Treatment of Remains*****.** ~~Consistent with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98, if human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. The remains shall be left in place and free from disturbance until~~

~~a final decision as to the treatment and disposition has been made. If the Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains.~~ If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines that remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

Implementation of this policy would help ensure that development carried out under the proposed 2040 General Plan would have a less than significant impact from potential disturbance of human remains, including those interred outside of formal cemeteries.

Mitigation Measures

Impacts would remain less than significant with implementation of applicable goals and policies from the 2040 General Plan. However the following measure is recommended to further reduce impacts to human remains. ~~No mitigation measures are required.~~

CR-4 Human Remains

If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be list in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines that remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

Significance After Mitigation

Impacts to human burials would be less than significant without mitigation~~.~~, however implementation of recommended Mitigation Measure CR-4 would further reduce impacts.

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4.6 Geology and Soils

This section of the EIR analyzes the potential physical environmental effects related to seismic hazards, underlying soil characteristics, slope stability, and erosion, within the Town of Windsor from implementation of the proposed 2040 General Plan.

4.6.1 Setting

Regional Geology

The Town of Windsor is located in the Russian River Valley approximately seven miles northwest of the City of Santa Rosa and five miles southeast of the City of Healdsburg. The Town lies within the Coast Range Geomorphic Province. This province is characterized by parallel northwest trending mountain ranges formed over the past 10 million years or less by active uplift related to complex tectonics of the San Andreas fault/plate boundary system (California Geological Survey [CGS] 2002). The province is bordered on the west by the Pacific Ocean, and the coastline is uplifted, terraced, and wave-cut (CGS 2002). The Coast Ranges are composed of thick Mesozoic and Cenozoic sedimentary strata, and north of the San Francisco Bay are dominated by irregular, knobby, landslide-topography of the Franciscan Complex (CGS 2002). The Russian River Valley is bordered by the Mayacama Mountains and Napa Valley to the east and coastal foothills to the west (USGS 2017). Alexander Valley is located north of Windsor and Petaluma Valley and the Sonoma Mountains are located to the southeast (USGS 2017).

During the historic period, four major earthquakes have occurred within or near the Sonoma County region that have affected Windsor residents. The 1906 San Francisco earthquake was a magnitude 8.3 earthquake on the northern segment of the San Andreas Fault that caused 65 deaths in the nearby City of Santa Rosa and damaged several buildings in Windsor. The 1969 Santa Rosa earthquake was a twin seismic event with magnitudes of 5.6 and 5.7 centered approximately two miles north of Santa Rosa. This earthquake resulted in no loss of life and only minor damage to structures in Windsor. The 1989 Loma Prieta earthquake occurred along the San Andreas Fault, centered approximately 10 miles northeast of the City of Santa Cruz. That 6.9 magnitude earthquake caused 63 deaths in the Bay Area but resulted in no loss of life or damage in Windsor. The Napa Valley earthquake occurred in 2014 near American Canyon, approximately 40 miles southeast of Windsor. This 6.0-magnitude earthquake caused light to moderate ground shaking in Windsor but no loss of life or major property damage (Town of Windsor 2015a).

Local Geologic Setting

The elevation in the Town of Windsor ranges from approximately 120 feet in the plain to approximately 430 feet in the foothills on the eastern edge of the Town. The Russian River and Dry Creek valleys merge north of Windsor and combine to form a large alluvial plain known as the Santa Rosa Plain (Town of Windsor 2015a). Windsor is located on the northern boundary of the Santa Rosa Plain, which is generally flat with a gentle slope to the southwest (USGS 2017). This plain is composed of Mesozoic basement rocks of the Franciscan Complex, Coast Range ophiolite, and Great Valley Sequence that are overlain by volcanics and Miocene fluvial and estuarine sedimentary rocks; Pliocene fluvial, estuarine, and marine littoral and shelf sediments; and Quaternary and Late Pliocene alluvial fan and basin deposits (McPhee et al. 2007). The majority of surficial sediments in the Town of Windsor consist of Pleistocene to recent alluvium and alluvial fan deposits (CGS 2011).

The most abundant soil group in Windsor is Huichica loam. This fine-loamy soil is typically found on hills and terraces and is moderately well drained with a moderate potential for erosion and a high to very high runoff classification. The north-central portion of Windsor contains Cole clay loam and Yolo silt loam. Yolo silt loam is also present along the eastern border of the Town. Cole clay loam has a fine particle size and is typically found on alluvial fans and in river valleys. This soil is somewhat poorly drained with a slight potential for erosion and a medium runoff classification. Yolo silt loam has a fine-silty particle size and is typically found on alluvial fans and in river valleys. This soil is well drained with a slight potential for erosion and a low runoff classification. The northeastern portion of the Town contains Felta very gravelly loam, which has a loamy-skeletal particle size and is typically found on hills and terraces. This soil is well drained, with a potential for severe erosion and a high runoff classification. The southeastern portion of the Town contains Clear Lake clay, which has a fine particle size and is typically found on basin floors and in river valleys. This soil is poorly drained, with a slight potential for erosion and a high runoff classification (NRCS 2015).

Seismic Hazards

Northern California is a region of high seismic activity. Similar to most cities in the region, Windsor is subject to risks associated with potentially destructive earthquakes. A small area of the northeast portion of the Town is located within an Earthquake Fault Zone defined by the Alquist-Priolo Earthquake Hazards Act of 1972 (Division of Mines and Geology 1978). The type and magnitude of seismic hazards with the potential to affect the Town are dependent on the distance to the epicenter of the earthquake, the nature of the fault, on which the earthquake is located, and the intensity and magnitude of the seismic event.

Faults

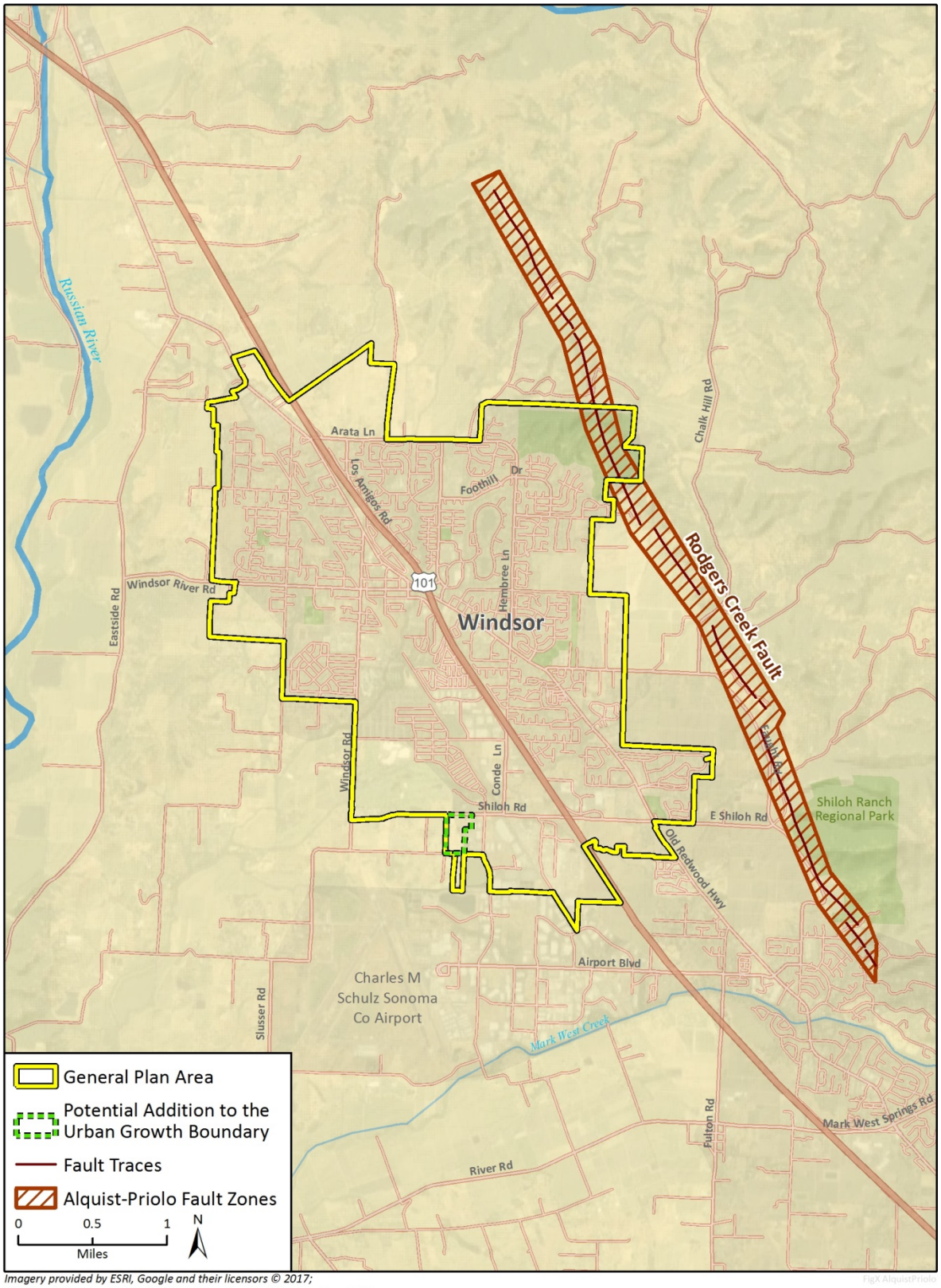
The CGS establishes criteria for classification of faults as active, potentially active, or inactive. Active faults are those that show evidence of surface displacement within the last 11,700 years (Holocene period). Potentially active faults are those that demonstrate displacement within the past 1.6 million years (Quaternary period). Faults showing no evidence of displacement within the last 1.6 million years are considered inactive.

The most significant active regional faults include the Maacama, San Andreas, and Rodgers Creek Faults. The south section of the Maacama Fault runs southeast to northwest, parallel to the Alexander Valley, and is located approximately 3.5 miles northeast of the Town at the nearest point (CGS 2010). The North Coast section of the San Andreas Fault runs southeast to northwest along the coastline of the Pacific Ocean and is located approximately 18 miles southwest of the Town at the nearest point (CGS 2010).

The Rodgers Creek Fault runs southeast to northwest from San Pablo Bay to just north of Windsor where it meets the Healdsburg Fault (CGS 2010). As shown in Figure 11, the Rodgers Creek Fault runs beneath the northeastern corner of Windsor, within the Foothill Regional Park (CGS 2010). This fault trace and adjacent lands are mapped as an Alquist-Priolo Earthquake Fault Zone (CGS 1983).

The Healdsburg Fault also runs through the northeastern corner of the Town, parallel to and west of the Rodgers Creek Fault (CGS 2010). However, the Healdsburg Fault is not considered an active fault and is not associated with an Alquist-Priolo Earthquake Fault Zone (CGS 2010).Displacement along each of these faults has occurred during the Holocene period (during the past 11,700 years), and displacement along the San Andreas Fault has occurred during the historic period of the past 200 years (CGS 2010). Although two large earthquakes (magnitude 5.6 and 5.7) occurred in 1969 near

Figure 11 Alquist-Priolo Earthquake Fault Zones



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Additional data provided by California Department of Conservation, 1983.

the City of Santa Rosa between the Rodgers Creek Fault and the Healdsburg Fault, neither of those faults is considered active during the historic period because the epicentral area of the two earthquakes coincides with a one kilometer right step-over from the northwest-striking Rodgers Creek Fault to the Healdsburg Fault zone and a six kilometer right step-over to the Maacama Fault (Wong and Bott 1994).

Ground Shaking and Surface Rupture

In general terms, an earthquake is caused when strain energy in rocks is suddenly released by movement along a plane of weakness. Faults generally produce damage in two ways: ground shaking and surface rupture. Seismically-induced ground shaking covers a wide area and is greatly influenced by the magnitude of the earthquake, the distance to the fault displacement, soil and bedrock conditions, and depth to groundwater. The energy released during an earthquake propagates in the form of seismic waves. The resulting strong ground motion from the seismic wave propagation can cause substantial damage to structures. Intensity is usually greater in areas underlain by unconsolidated material than in areas underlain by more competent rock. Earthquakes are characterized by moment magnitude, which is a quantitative measure of the strength of the earthquake based on strain energy released during the event. Most of the Town would be subject to violent ground shaking during a strong earthquake along either the Rodgers Creek or Maacama Fault. The western portion of the town would be subject to very strong ground shaking during a strong earthquake along any of the major active faults in the region.

In some cases, fault movement propagates upward through subsurface materials and causes displacement at the ground surface as a result of differential movement. Surface rupture is limited to areas very near the fault. Surface rupture usually occurs along traces of known or potentially active faults, although many historic events have occurred on faults not previously known to be active. The potential for surface rupture within the Town most likely is limited to the Rodgers Creek Alquist-Priolo Earthquake Fault Zone that runs through the Foothill Regional Park.

Secondary Seismic Effects

Potential hazards resulting from the secondary effects of ground-shaking include: liquefaction, subsidence, and earthquake-induced landslides. Soil-disturbing activities such as grading, soil compaction, and cut and fill activities can create or exacerbate conditions that increase the chance of such effects during or independent of seismic activity.

Liquefaction

Soil liquefaction results from the temporary buildup of excess pore pressures, which can result in a condition of near zero effective stress and temporary loss of strength. Several factors influence a soil's potential for liquefaction during an earthquake. These factors include: magnitude and proximity of the earthquake; duration of shaking; soil types; grain size distribution; clay fraction content; density; angularity; effective overburden; location of groundwater table; cyclic loading; and soil stress history. Liquefaction is more likely in poorly-graded, saturated, low-density sands. With increasing overburden, density and increasing clay-content, the likelihood of liquefaction decreases. The CGS does not map Earthquake Zones of Required Investigation, which are areas of identified seismic hazard, associated with liquefaction within or near Windsor. However, the USGS does provide information on the potential for liquefaction within the Town. Areas of high susceptibility to liquefaction within the Town are closely associated with stream channels such as Windsor Creek and Pool Creek (USGS 2006). The potential for liquefaction quickly decreases with distance from the

steam alignments. However, substantial areas of moderate liquefaction potential exist in the northern and eastern portions of the Town, generally parallel to and west of the foothills to the east (USGS 2006).

Subsidence

Subsidence is the sinking of the ground surface caused by the compression of soil layers. This compression is caused by deep-seated settlement of these soil layers, which in turn is caused by human activities or natural effects such as extraction of groundwater, oil and gas withdrawal, oxidation of organics, and the placement of additional fill over compressible layers. Seismically-induced subsidence occurs in loose to medium density unconsolidated soils above groundwater. These can compress when subject to seismic shaking, causing subsidence. This subsidence is exacerbated by increased loading, such as from the construction of structures onsite. This hazard can be mitigated prior to development through removal and re-compaction of loose soils.

Landslides and Slope Instability

Seismic ground shaking can also result in landslides and other slope instability. Landslides occur when slopes become unstable and masses of earth material move downslope. Landslides are usually rapid events, often triggered during periods of rainfall or by earthquakes. Mudslides and slumps are a more shallow type of slope failure. They typically affect the upper soil horizons rather than bedrock features. Usually mudslides and slumps occur during or soon after periods of rainfall, but they can be triggered by seismic shaking. The CGS does not map Earthquake Zones of Required Investigation, which are areas of identified seismic hazard, associated with landslides within or near Windsor. However, the USGS does provide information on the potential for landslides within the Town. Windsor is generally flat and is not subject to substantial risk from landslides. The greatest potential for landslide within the Town is in the northeast where the topography becomes steeper along the edge of the foothills to the east (USGS 1997).

Soil Hazards

Some of the soil hazards discussed above, such as subsidence, landslides and slope instability, can be triggered by or occur independently of seismic events. Others, such as expansive soils and erosion, occur independently of seismic events.

Expansive Soils

Expansive soils swell or heave with increases in moisture content and shrink with decreases in moisture content. These soils usually contain high clay content. Common soils with moderate to high clay content (over 30 percent) in Windsor include Clear Lake clay, Cole, and Huichica loam (Town of Windsor 2015a). Foundations for structures constructed on expansive soils require special design considerations. Because expansive soils can expand when wet and shrink when dry, they can cause foundations, basement walls and floors to crack, causing substantial structural damage. As such, structural failure due to expansive soils near the ground surface is a potential hazard.

Soil Erosion

Erosion refers to the removal of soil by water or wind. Factors that influence erosion potential include the amount of rainfall and wind, the length and steepness of the slope, and the amount and type of vegetative cover. The generalized distribution of erosion potential in Windsor can be

estimated by evaluating the soil characteristics described in the Sonoma County Soils Report. The majority of areas throughout Windsor have low potential for soil erosion due to the town's generally flat topography (Town of Windsor 2015a). However, soil erosion is dependent on individual site locations and conditions onsite.

Regulatory Setting

Federal

Clean Water Act

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

Individual projects within the Town that disturb more than one acre would be required to obtain NPDES coverage under the California General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) describing Best Management Practices (BMPs) the discharger would use to prevent and retain storm water runoff and to prevent soil erosion.

State

California Building Code

The CBC, Title 24, Part 2 provides building codes and standards for the design and construction of structures in California. The 2016 California Building Code is based on the 2015 International Building Code with the addition of more extensive structural seismic provisions. Chapter 16 of the California Building Code contains definitions of seismic sources and the procedure used to calculate seismic forces on structures.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 was passed into law following the destructive February 9, 1971 M6.6 San Fernando earthquake. The Act provides a mechanism for reducing losses from surface fault rupture on a statewide basis. The intent of the Act is to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. This Act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age faults are considered potentially active, and pre-Quaternary age faults are considered inactive.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (the Act) of 1990 was passed into law following the destructive October 17, 1989 M6.9 Loma Prieta earthquake. The Act directs the CGS to delineate Seismic Hazard Zones. The purpose of the Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The Act requires that site-specific geotechnical investigations be performed prior to permitting most urban development projects within seismic hazard zones.

Local

Code of the Town of Windsor

The Code of the Town of Windsor (Title VII, Chapter 2, Article 3) adopts by reference the 2016 California Building Code with no amendments related to earthquake hazards. The Code of the Town of Windsor (Title IX, Chapter 4, Article 3) also contains restrictions and Best Management Practices to reduce and/or prevent soil erosion. Grading is prohibited on slopes of 10 percent or greater between October 1 and April 30, unless an exemption is granted. For construction sites that disturb less than one acre of land, the Town requires an erosion and sediment control plan that contains the design and implementation plans for BMPs such as vegetation preservation, silt fencing, fiber rolls, sand bag barriers, gravel bag berms, and stockpile management. For construction sites that disturb more than one acre, in addition to BMPs similar to those listed above the developer must prepare a SWPPP in accordance with the requirements of the Construction General Permit.

Town of Windsor Local Hazard Mitigation Plan

The Town of Windsor Local Hazard Mitigation Plan (LHMP) establishes the Town's strategy to reduce the impacts of natural hazards, including groundshaking, liquefaction, and landslides. The LHMP focuses on mitigating hazards by establishing strategies to prevent future disasters and/or minimize their impacts. Natural hazards that may impact the Town are discussed and assessed in the LHMP to determine the probability of occurrence and social vulnerability for each hazard (Town of Windsor 2017b).

4.6.2 Impact Analysis

Methodology and Thresholds of Significance

Methodology

This section describes the potential environmental impacts of the proposed project relevant to geology and soils. The impact analysis is based on an assessment of baseline conditions for the proposed project area, including topography, geologic and soil conditions, and seismic hazards, as described above under the Subsection 4.6.1, *Setting*. This analysis identifies potential impacts based on the predicted interaction between the affected environment and construction, operation, and maintenance activities related to development predicted to occur under the proposed project. This section describes impacts in terms of location, context, duration, and intensity, and recommends mitigation measures, when necessary, to avoid or minimize impacts.

Significance Thresholds

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. For the purposes of this EIR, implementation of the proposed project may have a significant adverse impact if it would do any of the following:

1 Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

   a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault

   b. Strong seismic ground shaking

   c. Seismic-related ground failure, including liquefaction

   d. Landslides

2 Result in substantial soil erosion or the loss of topsoil

3 Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse

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

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

Threshold:	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, or landslides; or, be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

IMPACT GEO-1 CONSTRUCTION AND OCCUPANCY OF NEW BUILDINGS UNDER THE 2040 GENERAL PLAN COULD RESULT IN EXPOSURE OF PEOPLE OR STRUCTURES TO A RISK OF LOSS, INJURY, OR DEATH FROM SEISMIC EVENTS. ADHERENCE TO THE REQUIREMENTS OF THE CALIFORNIA BUILDING CODE AND IMPLEMENTATION OF THE GOALS AND POLICIES OF THE 2040 GENERAL PLAN WOULD MINIMIZE THE POTENTIAL FOR LOSS, INJURY, OR DEATH FOLLOWING A SEISMIC EVENT AND WOULD REDUCE THIS IMPACT TO A LESS-THAN-SIGNIFICANT LEVEL.

As discussed above in Subsection 4.6.1, *Setting*, an Alquist-Priolo Earthquake Fault Zone associated with the Rodgers Creek Fault runs through Foothill Regional Park in the northeast corner of the Town. The eastern portion of the town would be subject to violent ground shaking during a large earthquake along either the Rodgers Creek or Maacama Fault, and the remainder of the Town would be subject to very strong ground shaking during a strong earthquake along any of the major active faults in the region. Although there are no Earthquake Zones of Required Investigation associated with liquefaction or earthquake-induced landslide within or near Windsor, most of the

eastern portion of the Town is subject to a moderate risk of liquefaction and small areas in the foothills on the eastern edge of the Town are subject to a risk of landslides.

Development under the 2040 General Plan would result in additional residential and nonresidential development within the Town. As such, additional residents and employees would be potentially exposed to the effects of fault rupture, seismic groundshaking, liquefaction, and landslides from local and regional earthquakes. Structures that would be built on steep slopes could be exposed to an existing risk of landslide or if improperly constructed could exacerbate existing landslide conditions. New structures built under the 2040 General Plan could also experience substantial damage during seismic groundshaking events. Fault rupture is unlikely to affect new or existing structures in the Town because the only Alquist-Priolo Earthquake Fault Zone is located in the undeveloped Foothill Regional Park. The 2040 General Plan would encourage infill development, which would in many cases replace older buildings subject to seismic damage with newer structures built to current seismic standards that could better withstand the adverse effects of strong ground shaking. Potential structural damage and the exposure of people to the risk of injury or death from structural failure would be minimized by compliance with California Building Code engineering design and construction measures. Foundations and other structural support features would be designed to resist or absorb damaging forces from strong ground shaking and liquefaction.

In addition to compliance with mandatory California Building Code requirements, implementation of several 2040 General Plan goals and policies would further reduce the potential for loss, injury, or death following a seismic event. Implementation of the following 2040 General Plan goals and policies would help to avoid seismic hazards, resist the adverse effects of seismic events and unstable geologic units, maintain adequate resources to respond to a seismic event, and educate the public about the dangers of and appropriate response to a seismic event:

Public Facilities and Services Goals and Policies

Goal PFS-7: Fire Protection and Emergency Services. Provide high quality fire and emergency response to prevent the loss of life, injury, and property.

> **Policy PFS-7.8 *Emergency Center Siting*.** The Town shall ensure critical facilities such as fire, police, and emergency response facilities, not be sited in areas subject to ground rupture and severe groundshaking from earthquakes, and flooding during a 100-year storm, unless there are no practicable alternative sites.

Environmental Resources Goals and Policies

Goal ER-1: Open Space. Preserve open space land for the continuation of commercial agricultural and productive uses, the protection and use of natural resources, the enjoyment of scenic beauty and recreation, and the protection from natural hazards.

> **Policy ER-1.3 *Reducing Development in Significant Threat Areas*.** The Town shall ensure that areas that pose significant threats to public health and safety, such as steep slopes, regulatory floodways, and the Alquist-Priolo Special Study Zone, are pre-dominantly maintained as open space.

Public Health and Safety Goals and Policies

Goal PHS-1: Emergency Response and Preparedness. Maintain a high level of emergency preparedness to respond to natural or human-caused disasters.

Policy PHS-1.1 *Hazard Mitigation Plan*. In accordance with Government Code Section 65302(g)(4), the Town will continue to maintain a Local Hazard Mitigation Plan that identifies the hazards, risks, and vulnerabilities to natural disasters and strategies on how to prevent, prepare, and mitigate potential impacts. This plan shall address climate change and adaptation strategies as required under this government code section.

Policy PHS-1.2 *Locating Emergency Response Facilities and Infrastructure.* The Town shall ensure that emergency response facilities and infrastructure are located to avoid hazardous areas (e.g., seismically prone areas and FEMA 100-year flood zone), and designed to remain functional following a major natural or human-made disaster. When the location of emergency facilities and infrastructure in such areas cannot be avoided, effective measures should be implemented to minimize potential damage and public inconvenience.

Goal PHS-2: Seismic and Geologic Hazards. Minimize the risk to lives and property due to geologic and seismic hazards.

Policy PHS-2.1 *Maintain Open Space in Hazardous Areas*. The Town shall encourage the County to maintain the existing low intensity, rural land use designations and zoning in the following areas to limit exposure of people and structures to hazards:

a. The northeastern portion of the Planning Area, and to the west in the transition area from the Santa Rosa Plain to the Russian River floodplain, where there is moderate or high potential for landslides.

b. The Alquist-Priolo Special Study Zone established for the Healdsburg-Rodgers Creek fault, where there is potential for ground rupture.

Policy PHS-2.2 *Development on Steep Slopes*. The Town shall discourage development in areas with slopes of 20 percent or greater to reduce the potential impacts of erosion and slope instability. New development proposed on slopes of 20 percent or greater shall provide an assessment of the site slope stability, susceptibility to landslide, and erodibility prepared by a certified engineering geologist. The Town shall require mitigation measures as necessary based on the site assessment.

Policy PHS-2.3 *Development Review for Hazards*. The Town shall consider the potential danger to health, safety, and welfare of Windsor residents and businesses in its review of development applications and seek to have hazardous conditions mitigated to an acceptable level. When development is proposed in or near a known hazard area, a technical analysis (e.g., geotechnical report, flood analysis, structural engineering report) shall be completed.

Policy PHS-2.4 *Building Code Compliance*. The Town shall continue to comply with the prevailing version of the California Code of Regulation.

Policy PHS-2.5 *Placement of County Infrastructure in Hazard Areas*. The Town shall discourage the County from siting any facilities necessary for emergency services, major utility lines and facilities, manufacturing plants using or storing hazardous materials, high occupancy structures (such as multifamily residences and large public assembly facilities), or facilities housing dependent populations (such as schools and convalescent centers) within the Alquist-Priolo Special Studies Zone.

Policy PHS-2.6 *Emergency Facilities Operation During an Earthqu*ake. The Town shall require that facilities necessary for emergency services be capable of withstanding a maximum credible

earthquake from any of the three active faults in the region and remaining operational to provide emergency response.

Policy PHS-2.7 *Geotechnical Hazards Report*. For parcels that partially lie within seismically active areas that are designated with the extreme or heavy ground shaking intensity areas shown in Figure PHS-1 or that are susceptible to liquefaction shown in Figure PHS-2, the Town shall require a geotechnical hazards report, prepared by a certified engineering geologist, or geotechnical engineer, to identify the most appropriate building areas and corrective measures to minimize potential hazards. Recommendations from these investigations, or equivalent measures deemed acceptable by the Town, shall be incorporated as conditions of any project approval.

Policy PHS-2.8 *Earthquake Hazard Awareness*. The Town shall educate the general public on how to prepare and plan for a seismic event.

Implementation of these goals and policies would result in the avoidance of siting critical facilities or other structures within areas susceptible to fault rupture (Policies PFS-7.8, ER-1.3, PHS-1.2, PHS-2.1, PHS-2.3, and PHS-2.5), would require more detailed review of design and construction plans and incorporation of additional structural safety features as necessary for structures that would be located on steep slopes or in areas subject to seismic hazards such as extreme ground shaking or liquefaction (Policies ER-1.3, PHS-2.2, PHS-2.3, and PHS-2.7), would ensure that adequate emergency response is available during an earthquake (Policy PHS-2.6), and would educate the public on earthquake preparedness (Policy PHS-2.8). Implementation of these goals and policies, in addition to compliance with applicable laws and regulations, would minimize the potential for loss, injury, or death following a seismic event and would reduce this potential impact to a less-than-significant level.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Result in substantial soil erosion or the loss of topsoil.

IMPACT GEO-2 CONSTRUCTION OF NEW DEVELOPMENT UNDER THE 2040 GENERAL PLAN WOULD INCLUDE GROUND DISTURBANCE SUCH AS EXCAVATION AND GRADING THAT WOULD RESULT IN LOOSE OR EXPOSED SOIL. THIS DISTURBED SOIL COULD BE ERODED BY WIND OR DURING A STORM EVENT, WHICH WOULD RESULT IN THE LOSS OF TOPSOIL. COMPLIANCE WITH APPLICABLE REGULATIONS, INCLUDING THE CLEAN WATER ACT, AND IMPLEMENTATION OF THE GOALS AND POLICIES OF THE 2040 GENERAL PLAN WOULD MINIMIZE THE POTENTIAL FOR EROSION AND LOSS OF TOPSOIL AND WOULD REDUCE THIS POTENTIAL IMPACT TO A LESS-THAN-SIGNIFICANT LEVEL.

Windsor's topography is relatively flat with a gentle slope to the southwest, except for the foothills on the eastern edge of the Town. The majority of soil groups in the Town have a moderate to low susceptibility erosion (NRCS 2015). Thus, the potential for soil erosion over a large part of the Town is low. Along the eastern edge of the Town where the slopes are more severe within the foothills, the potential for soil erosion increases. Soils with smaller grain size and lower cohesion, such as sandy silt, have moderate erosion potential. The Felta very gravely loam soil group in the

northeastern portion of the Town is highly susceptible to erosion, mainly due to its location on steep slopes. Development under the 2040 General Plan would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water.

Construction activities that disturb one or more acres of land surface are subject to the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) adopted by the State Water Resources Control Board (SWRCB). Compliance with the permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit conditions require development of a storm water pollution prevention plan (SWPPP), which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-storm water management controls. Inspection of construction sites before and after storms is also required to identify storm water discharge from the construction activity and to identify and implement erosion controls, where necessary. Compliance with the Construction General Permit is reinforced through the Code of the Town of Windsor, which requires the development of an erosion and sediment control plan that is equivalent to the required SWPPP.

The Code of the Town of Windsor also requires an erosion and sediment control plan for construction sites that disturb less than one acre. The erosion and sediment control plan must contain BMPs to reduce or prevent erosion, such as vegetation preservation, silt fencing, fiber rolls, sand bag barriers, gravel bag berms, and stockpile management. Grading on slopes greater than 10 percent is prohibited between October 1 and April 30, unless an exemption is granted. Adherence to the requirements of the Code of the Town of Windsor would reduce the potential for new construction under the 2040 General Plan to cause erosion or the loss of topsoil by ensuring proper management of loose and disturbed soil.

In addition to compliance with mandatory Clean Water Act and Code of Town of Windsor requirements, implementation of 2040 General Plan goals and policies would further reduce the potential erosion and loss of topsoil from construction-related soil disturbance. Implementation of the following 2040 General Plan goals and policies would help to ensure proper soil management and would minimize the potential for erosion:

Public Facilities and Services Goals and Policies

Goal PFS-4: Storm water Drainage. Improve the Town's storm water drainage system to reduce excess runoff, reduce impacts to water quality, and protect environmentally sensitive areas.

> **Policy PFS-4.3 *Low Impact Development*.** The Town shall provide Low Impact Development (LID) requirements for new development and reconstruction projects to reduce pollutants in storm water. The Town shall implement LID in conjunction with the policies specified by the State Water Resources Control Board (SWRCB) and National Pollutant Discharge Elimination System (NPDES) Permit regarding storm water runoff, treatment and collection.
>
> **Policy PFS-4.5 *Construction Activities and Grading Effects on Water Quality*.** The Town shall develop and implement policies that support erosion control and reduce water quality impacts resulting from grading and construction activities.

Public Health and Safety Goals and Policies

Goal PHS-2: Seismic and Geologic Hazards. Minimize the risk to lives and property due to geologic and seismic hazards.

> **Policy PHS-2.2 *Development on Steep Slopes*.** The Town shall discourage development in areas with slopes of 20 percent or greater to reduce the potential impacts of erosion and slope instability. New development proposed on slopes of 20 percent or greater shall provide an assessment of the site slope stability, susceptibility to landslide, and erodibility prepared by a certified engineering geologist. The Town shall require mitigation measures as necessary based on the site assessment.

Implementation of these goals and policies would ensure that the Town continues to develop policies that support erosion control and that new development on steep slopes is properly designed and constructed to minimize erosion. Implementation of these goals and policies, in addition to compliance with applicable laws and regulations, would minimize the potential for erosion and loss of topsoil and would reduce this potential impact to a less-than-significant level.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

IMPACT GEO-3 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN MAY RESULT IN THE CONSTRUCTION OF STRUCTURES ON EXPANSIVE SOILS, WHICH COULD CREATE A SUBSTANTIAL RISK TO LIFE OR PROPERTY. HOWEVER, ALL NEW DEVELOPMENT WOULD BE REQUIRED TO COMPLY WITH THE STANDARDS OF THE CALIFORNIA BUILDING CODE, WHICH WOULD ENSURE THAT EXPANSIVE SOILS ARE REMEDIATED OR THAT FOUNDATIONS AND STRUCTURES ARE ENGINEERED TO WITHSTAND THE FORCES OF EXPANSIVE SOIL. COMPLIANCE WITH THE REQUIREMENTS OF THE CALIFORNIA BUILDING CODE WOULD REDUCE THIS IMPACT TO A LESS-THAN-SIGNIFICANT LEVEL.

New development that is constructed on expansive soils could be subject to damage or could become unstable when the underlying soil shrinks or swells. Soils with high clay content have the highest potential for shrink-swell. Common soils with moderate to high clay content (over 30 percent) in Windsor include Clear Lake clay, Cole, and Huichica loam. The California Building Code includes requirements to address soil-related hazards. Typical measures to treat hazardous soil conditions involve removal, proper fill selection, and compaction. In cases where soil remediation is not feasible, the California Building Code requires structural reinforcement of foundations to resist the forces of expansive soils. Compliance with the requirements of the California Building Code would reduce impacts related to expansive soils to a less-than-significant level.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

IMPACT GEO-4 NEW DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN WILL OCCUR PRIMARILY WHERE EXISTING SEWER SYSTEMS ARE IN PLACE. HOWEVER, RURAL RESIDENTIAL IS AN ALLOWED LAND USE UNDER THE 2040 GENERAL PLAN. THIS TYPE OF DEVELOPMENT TYPICALLY DOES NOT HAVE URBAN SERVICES SUCH AS SANITARY SEWER SYSTEMS. NEW RURAL RESIDENTIAL DEVELOPMENT UNDER THE 2040 GENERAL PLAN MAY REQUIRE THE USE OF SEPTIC SYSTEMS OR ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS. WITHOUT PROPER SITE INVESTIGATION, THESE SYSTEMS MAY BE CONSTRUCTED ON SOILS INCAPABLE OF ADEQUATELY SUPPORTING THEIR USE. IMPLEMENTATION OF MITIGATION TO REQUIRE A SOIL INVESTIGATION PRIOR TO THE CONSTRUCTION OF A NEW SEPTIC TANK OR ALTERNATIVE WASTEWATER DISPOSAL SYSTEM WOULD REDUCE THIS IMPACT TO A LESS-THAN-SIGNIFICANT LEVEL.

The 2040 General Plan encourages growth management and development within the town limits. Under the 2040 General Plan, the location and timing of growth in Windsor will be planned, taking into consideration infrastructure capacity, public service availability, and fiscal impacts. In general, new development under the 2040 General Plan would occur where existing roads, water, and sewer systems are in place and in a manner that minimizes the impact of development on existing infrastructure and services. However, Rural Residential is an allowable land use under the 2040 General Plan and this type of development may not have urban services such as sanitary sewer systems. If septic tanks or alternative wastewater disposal systems are installed to support this new development without first performing a soil investigation to determine the adequacy of the underlying soils to support such systems, adverse effects related to improper wastewater disposal could occur. This could result in adverse effects to environmental or human health. Impacts would be potentially significant.

Mitigation Measures

The following mitigation measure is required.

GEO-1 Soil Investigations for Septic Systems Policy

The following policy shall be added to the Public Facilities and Services Element under Goal PFS-3, Wastewater and Water Reclamation System:

> **Policy PFS-3.12 *Soil Investigations for Septic Systems*.** For new Rural Residential (RR) development or other residential development projects not connected to the sewer system and requiring the use of septic tanks or alternative wastewater disposal systems, the Town shall require that a soil investigation be submitted for review and approval that demonstrates the capability of the underlying soils to support the use of septic tanks or alternative wastewater disposal systems.

Significance After Mitigation

Adherence to Policy LU-2.8 would ensure that new septic tanks or alternative wastewater disposal systems are constructed on soils that are capable of supporting such systems. The Town would

review the results of the required soil investigation and would deny construction permit applications for new development not connected to the sanitary sewer system in locations that do not have soils capable of supporting septic tanks or alternative wastewater disposal systems. Impacts would be less than significant with incorporation of mitigation.

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4.7 Greenhouse Gas Emissions

This section discusses the 2040 General Plan's potential impacts related to emissions of greenhouse gases (GHG) and climate change. Traffic projections used in emissions estimates are based on the traffic modeling and analysis prepared by Sonoma County Transportation Authority and W-Trans dated June 2017 (Appendix D).

4.7.1 Setting

Climate Change and Greenhouse Gases

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills.

Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF6 (California Environmental Protection Agency [CalEPA] 2006). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2e), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane CH4 has a GWP of 25, meaning its global warming effect is 25 times greater than carbon dioxide on a molecule per molecule basis (IPCC 2007).

Greenhouse Gas Emissions Inventory

California Emissions Inventory

Based on the California Air Resources Board (CARB) California Greenhouse Gas Inventory for 2000-2014, California produced 441.5 MMT CO_2e in 2014 (CARB 2016). The largest single source of GHG in California is transportation, contributing 37 percent of the state's total GHG emissions. Industrial sources are the second largest source of the state's GHG emissions, contributing 24 percent of the state's GHG emissions (CARB 2016). California emissions are due in part to its large size and large population compared to other states. However, the state's mild climate reduces California's per capita fuel use and GHG emissions as compared to other states. CARB has projected statewide unregulated GHG emissions for the year 2020 will be 509.4 MMT CO_2e (CARB 2016). These projections represent the emissions that would be expected to occur in the absence of any GHG reduction actions.

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Long-term trends have found that each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The global combined land and ocean temperature data show an increase of about 0.89°C (0.69°C–1.08°C) over the period 1901–2012 and about 0.72°C (0.49°C–0.89°C) over the period 1951–2012 when described by a linear trend. Several independently analyzed data records of global and regional Land-Surface Air Temperature (LSAT) obtained from station observations are in agreement that LSAT as well as sea surface temperatures have increased. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades (IPCC 2014).

Potential impacts of climate change in California may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (CalEPA 2010). Below is a summary of some of the potential effects that could be experienced in California as a result of climate change.

Air Quality

Higher temperatures, which are conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thereby ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (California Energy Commission [CEC] 2009).

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future water supplies in California. However, the average early spring snowpack in the Sierra Nevada decreased by about 10 percent during the last century, a loss of 1.5 million acre-feet of snowpack storage. During the same period, sea level rose eight inches along California's coast. California's temperature has risen 1°F, mostly at night and during the winter, with higher elevations experiencing the highest increase. Many California cities have experienced their lowest recorded annual precipitation twice within the past decade. In a span of only two years, Los Angeles experienced both its driest and wettest years on record (California Department of Water Resources [DWR] 2008; CCCC 2009).

This uncertainty complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The Sierra

snowpack provides the majority of California's water supply by accumulating snow during the state's wet winters and releasing it slowly during the state's dry springs and summers. Based on historical data and modeling DWR projects that the Sierra snowpack will experience a 25 to 40 percent reduction from its historic average by 2050. Climate change is also anticipated to bring warmer storms that result in less snowfall at lower elevations, reducing the total snowpack (DWR 2008).

Hydrology and Sea Level Rise

As discussed above, climate change could potentially affect: the amount of snowfall, rainfall, and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. According to The Impacts of Sea-Level Rise on the California Coast, prepared by the California Climate Change Center (CCCC) (CCCC 2009), climate change has the potential to induce substantial sea level rise in the coming century. The rising sea level increases the likelihood and risk of flooding. The rate of increase of global mean sea levels over the 2001-2010 decade, as observed by satellites, ocean buoys and land gauges, was approximately 3.2 mm per year, which is double the observed 20th century trend of 1.6 mm per year (World Meteorological Organization [WMO] 2013). As a result, sea levels averaged over the last decade were about 8 inches higher than those of 1880 (WMO 2013). Sea levels are rising faster now than in the previous two millennia, and the rise is expected to accelerate, even with robust GHG emission control measures. The most recent IPCC report (2013) predicts a mean sea–level rise of 11-38 inches by 2100. This prediction is more than 50 percent higher than earlier projections of 7-23 inches, when comparing the same emissions scenarios and time periods. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply due to salt water intrusion. In addition, increased CO2 emissions can cause oceans to acidify due to the carbonic acid it forms. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California has a $30 billion annual agricultural industry that produces half of the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater air pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality (CCCC 2006).

Ecosystems and Wildlife

Climate change and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists project that the average global surface temperature could rise by 1.0-4.5°F (0.6-2.5°C) in the next 50 years, and 2.2-10°F (1.4-5.8°C) in the next century, with substantial regional variation. Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes, such as carbon cycling and storage (Parmesan 2006).

Regulatory Setting

Federal Regulations

The U.S. Supreme Court in M*assachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 05-1120) held that the U.S. EPA has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act. The U.S. EPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines, and requires annual reporting of emissions. In 2012 the U.S. EPA issued a Final Rule that establishes the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration (PSD) and Title V Operating Permit programs are required for new and existing industrial facilities.

In 2014, the U.S. Supreme Court in *Utility Air Regulatory Group v. EPA* (134 S. Ct. 2427 [2014]) held that U.S. EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. The Court also held that PSD permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of Best Available Control Technology (BACT).

California Regulations

CARB is responsible for the coordination and oversight of State and local air pollution control programs in California. California has numerous regulations aimed at reducing the state's GHG emissions. These initiatives are summarized below.

California Advanced Clean Cars Program

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as "Pavley"), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, U.S. EPA granted the waiver of Clean Air Act preemption to California for its greenhouse gas emission standards for motor vehicles beginning with the 2009 model year. Pavley I regulates model years from 2009 to 2016 and Pavley II, which is now referred to as "LEV (Low Emission Vehicle) III GHG" regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the Low Emissions Vehicles (LEV), Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs, and would provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011).

Executive Order S-3-05

In 2005, former Governor Schwarzenegger issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets. EO S-3-05 provides that by 2010, emissions shall be reduced to 2000 levels; by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80 percent below 1990 levels (CalEPA 2006). In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report") (CalEPA 2006). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-

05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, etc.

Assembly Bill 32

California's major initiative for reducing GHG emissions is outlined in Assembly Bill 32 (AB 32), the "California Global Warming Solutions Act of 2006," signed into law in 2006. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020, and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO_2e. The Scoping Plan was approved by CARB on December 11, 2008, and included measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan. The 2013 Scoping Plan update defines CARB's climate change priorities for the next five years and sets the groundwork to reach post-2020 statewide goals. The update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluates how to align the State's longer-term GHG reduction strategies with other State policy priorities, such as for water, waste, natural resources, clean energy and transportation, and land use (CARB 2014).

Executive Order B-30-15

EO B-30-15 established a Statewide mid-term GHG reduction target of 40 percent below 1990 levels by 2030. Targets set beyond 2020 provide market certainty to foster investment and growth in industries like clean energy.

Senate Bill 97

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in CEQA documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHG and climate change impacts.

Senate Bill 375

Senate Bill (SB) 375, signed in August 2008, enhances the state's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger vehicles for 2020 and 2035. In addition, SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On September 23, 2010, CARB adopted final regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035.

The Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC) were assigned targets of a seven percent reduction in GHGs from transportation sources by 2020 and a 15 percent reduction by 2035. In 2013 ABAG and MTC adopted a RTP/SCS, called Plan Bay Area, which, when implemented, would meet the assigned targets by achieving a 10 percent per capita GHG emissions reduction in 2020 and a 16 percent reduction in 2035. Plan Bay Area is currently undergoing the next updated, Plan Bay Area 2040.

Senate Bill 32

Senate Bill 32 (SB 32) became effective on January 1, 2017 and requires CARB to develop technologically feasible and cost effective regulations to achieve the targeted 40 percent GHG emission reduction set in EO B-30-15. CARB is currently working to update the Scoping Plan to provide a framework for achieving the 2030 target. The Scoping Plan Update is expected to be completed and adopted by CARB in 2017. The Scoping Plan Update calls for emissions reductions at the State level that meet or exceed the Statewide GHG target, and notes that additional effort will be needed to maintain and continue GHG reductions to meet the mid- (2030) and long-term (2050) targets. Programs included in the Scoping Plan Update that would reduce emissions associated with local projects in Windsor include:

- Cap and Trade regulation
- Short lived climate pollutants (SLCP) reduction strategy
- Mobile Sources Cleaner Fuel Technology (CFT) and Freight providing a transition to cleaner fuels
- Behind-the-meter solar PV
- Increased energy efficiency
- Increased Renewables Portfolio Standard (RPS)
- Low Carbon Fuel Standard increased stringency
- Increased demand response and flexible loads

Additionally, the Scoping Plan Update recognizes the need to reach beyond Statewide policy and engage local jurisdictions to develop plans to address local conditions and provide a “fair share” contribution towards the achievement of the State’s GHG reduction targets. To assist local planning efforts with developing strategies to meet these targets, the Scoping Plan includes annual community-wide goals of no more than six metric tons CO_2e per capita by 2030 and no more than two metric tons CO_2e per capita by 2050 (ARB 2017c); as stated in the Proposed Scoping Plan, these goals are appropriate for plan level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the State.

California Environmental Quality Act

Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted CEQA Guidelines provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. To date, a variety of air districts have adopted quantitative significance thresholds for GHGs.

BAAQMD

In 2013, the BAAQMD adopted a resolution that builds on state and regional climate protection efforts by:

- Setting a goal for the Bay Area region to reduce GHG emissions by 2050 to 80 percent below 1990 levels.
- Developing a Regional Climate Protection Strategy to make progress towards the 2050 goal, using BAAQMD's Clean Air Plan to initiate the process.
- Developing a 10-point work program to guide the BAAQMD's climate protection activities in the near-term.

The BAAQMD is currently developing the Regional Climate Protection Strategy, but has outlined the 10-point work program, which includes policy approaches, assistance to local governments, and technical programs that will help the region make progress toward the 2050 GHG emissions goal.

Local Reductions

As noted above, because the majority of Windsor is located within the San Francisco Bay Area Air Basin (SFBAAB), the BAAQMD is responsible for enforcing standards and regulating stationary sources in their jurisdiction. The BAAQMD regulates GHG emissions through specific rules and regulations as well as project and plan level emissions thresholds for GHGs to ensure that the Bay Area contributes to its fair share of emissions reductions.

4.7.2 Impact Analysis

Methodology and Significance Thresholds

Significance Thresholds for GHG Emissions

Based on Appendix G of the *CEQA Guidelines*, impacts related to GHG emissions from the 2040 General Plan would be significant if the project would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The vast majority of individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence to climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]). The May 2017 *BAAQMD CEQA Air Quality Guidelines* contain two thresholds for determining significance of GHGs. The two approaches are as follows:

1. Consistency with a qualified GHG reduction plan
2. Meets the efficiency plan threshold of 6.6 MT CO_2e per service population per year

As discussed under Section 4.1, *Air Quality*, the BAAQMD developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether a proposed project could result in potentially significant GHG impacts. For this EIR, the Town of Windsor as the lead agency has determined that the significance thresholds in the BAAQMD's May 2017 *CEQA Air Quality Guidelines* for plan operations within the SFBAAB are the most appropriate threshold to use to determine the GHG impacts of the 2040 General Plan because they are supported by substantial evidence to be valid for use in the CEQA review process. The BAAQMD *CEQA Air Quality Guidelines* recommend that the 6.6 MT CO_2e per service population per year threshold be used for General Plans. According to the BAAQMD *Air Quality Guidelines*, a qualified GHG reduction strategy is one that includes the following elements:

1. Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area
2. Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable
3. Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area
4. Specify measures or a group of measures, including performance standards that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level
5. Monitor the plan's progress
6. Adopt the GHG Reduction Strategy in a public process following environmental review

The Town of Windsor adopted a Greenhouse Gas Emissions Reduction Action Plan (RAP) in 2008 and updated it in 2012. As it currently stands, the RAP describes 11 implementation measures that would be implemented in the Town in 2012-2015 to reduce the GHG emissions from Town-controlled sources in order to reach statewide goals to keep the Town on the trajectory to reach a goal of 26.2 percent GHG reduction below the baseline year of 2000. The RAP focuses on Town-controlled sources of emissions and does not include analysis of Townwide emissions. Therefore, the RAP is not a qualified GHG Reduction Strategy. In addition, the Town's RAP extends to 2020, while the horizon year of the General Plan is 2040. Therefore, the first BAAQMD GHG significance threshold cannot be applied to the 2040 General Plan.

Given the recent legislative attention and judicial action regarding post-2020 goals and the scientific evidence that additional GHG reductions are needed beyond the year 2020, the Association of Environmental Professionals' (AEP) Climate Change Committee published a white paper in 2016 recommending that CEQA analyses for most land use development projects can continue to rely on current thresholds for the immediate future, but that long term projects should consider post 2020 emissions demonstrating substantial progress toward the reduction trajectory that meets the 2050 statewide target (AEP, *Beyond 2020: The Challenges of Greenhouse Gas Reduction Planning by Local Governments in California 2016*). AEP also recommends that the significance determination should be based on demonstrating substantial progress along a post 2020 trajectory. Thus for a conservative approach, a year 2040 GHG efficiency threshold could be calculated to represent the rate of emissions reduction necessary for the 2040 General Plan to achieve a fair share of statewide GHG reductions necessary to meet SB 32 targets. However, a project-level CEQA significance threshold utilized for projects with a horizon year beyond 2020 should be updated to address the adopted 2030 target in SB 32 once the Scoping Plan Update for 2030 is adopted (AEP, *Beyond 2020:*

The Challenges of Greenhouse Gas Reduction Planning by Local Governments in California 2016). The ARB Scoping Plan Update has not yet been adopted and the Board Hearing for the 2030 Draft Scoping Plan was originally scheduled for June 22, 2017 but has been postponed indefinitely. Without adoption of the 2030 Scoping Plan Update it would be the responsibility of the 2040 General Plan to reduce emissions along the emissions reduction trajectory. This is an unrealistic scenario because the Scoping Plan Update is intended to integrate and build upon current State efforts to reduce GHG emissions with policies that include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade Program. These state reduction measures provide the majority of emissions reductions making it difficult for individual projects to solely achieve the necessary reductions. Therefore, because the ARB Scoping Plan Update has not yet been adopted, this EIR does not apply the GHG efficiency threshold approach for the 2040 General Plan.

Rather, for this EIR, the Town of Windsor has determined that the significance thresholds in the BAAQMD's May 2017 *CEQA Air Quality Guidelines* for project operations within the SFBAAB are the most appropriate thresholds for use to determine the GHG impacts of the 2040 General Plan. Therefore, the BAAQMD GHG efficiency threshold of 6.6 MT CO_2e per person per year is applied to the 2040 General Plan. Emissions greater than 6.6 MT CO_2e per person per year may conflict with substantial progress toward GHG reduction targets, and the project's cumulative contribution of emissions would be considered significant.

Methodology for Estimating GHG Emissions

The focus of this analysis and the estimate of net new GHG emissions are limited to only those potential emissions that would result from the buildout of the 2040 General Plan. While emissions generated in the Town and the region (such as those emissions generated by businesses or individual operations) may contribute to GHG emissions globally, only those emissions that may change compared to existing conditions as a result of the implementation of the 2040 General Plan are included in this EIR as a reasonable approach to estimate GHG/Climate Change impacts for the project (the 2040 General Plan). Emissions not directly a result of buildout of the 2040 General Plan are considered outside the scope of this CEQA analysis as it would be speculative to analyze impacts not directly related to the 2040 General Plan.

Buildout associated with the 2040 General Plan would include 11,067 new residents and 2,860 jobs, which is consistent with the 2040 General Plan Land Use Element and the traffic analysis prepared for the project, see Section 4.14, *Transportation and Traffic*. Commercial, residential, and industrial development associated with buildout of the 2040 General Plan would accommodate the estimated number of new residents and jobs in Windsor. The California Emissions Estimator Model (CalEEMod version 2016.3.1) was used to estimate GHG emissions associated with the 2040 General Plan. The analysis focuses on CO_2, CH_4, and N_2O because these make up 98.9 percent of all GHG emissions by volume (IPCC 2007) and are the GHG emissions that the 2040 General Plan would emit in the largest quantities. Fluorinated gases, such as HFCs, PFCs, and SF_6, were also considered for the analysis. Emissions of all GHGs are converted into their equivalent weight in CO_2 (CO_2e). Minimal amounts of other main GHGs (such as chlorofluorocarbons [CFCs]) would be emitted; however, these other GHG emissions would not substantially add to the calculated CO_2e amounts. Calculations are based on the methodologies discussed in the California Air Pollution Control Officers Association (CAPCOA) CEQA and Climate Change white paper (January 2008) and included the use of the California Climate Action Registry (CCAR) General Reporting Protocol (January 2009).

Construction Emissions

Construction inputs in CalEEMod included buildout of the 2040 General Plan. Average daily emissions from construction under the 2040 General Plan were calculated, including both on-site and off-site activities. On-site activities would consist of the operation of off-road construction equipment, as well as on-site truck travel (e.g., haul trucks, water trucks, dump trucks, and concrete trucks), whereas off-site sources would be emissions from construction vehicle trips. Pollutant emissions associated with buildout of the 2040 General Plan were estimated to begin in January 2018 and end with buildout of the 2040 General Plan.

Operational Emissions

CalEEMod calculates operational emissions from energy use (electricity and natural gas use) based on the California Energy Commission (CEC) sponsored California Commercial End Use Survey (CEUS) for residential and non-residential land uses. Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating are calculated based on standard emission rates from the CARB, U.S. EPA, and district supplied emission factor values. Emissions from waste generation are based on the IPCC's methods for quantifying GHG emissions from solid waste using the degradable organic content of waste. Waste disposal rates by land use and overall composition of municipal solid waste in California are primarily based on data provided by the California Department of Resources Recycling and Recovery (CalRecycle). Emissions from water and wastewater usage calculated in CalEEMod are based on the default electricity intensity from the CEC's 2006 Refining Estimates of Water-Related Energy Use in California using the average values for Northern California (CAPCOA 2016).

Transportation Emissions

Emissions of CO_2 and CH_4 from transportation sources for the 2040 General Plan were quantified using CalEEMod. Because CalEEMod does not calculate N_2O emissions from mobile sources, N_2O emissions were quantified in accordance with the California Climate Action Registry General Reporting Protocol (January 2009) based on the vehicle mix output generated by CalEEMod and EMFAC N_2O emission factors for different vehicle classes. The N_2O emissions were then added to the mobile emissions from CalEEMod. The estimate of total daily trips associated with the 2040 General Plan is based on vehicle trip data provided in Section 4.14, *Transportation and Traffic*. The overall vehicle fleet mix used in the analysis is the default fleet mix provided in the CalEEMod software.

A limitation of the quantitative analysis of emissions from mobile combustion is that emission models, such as CalEEMod, evaluate aggregate emissions, meaning that all vehicle trips and related emissions assigned to a project are assumed to be new trips and emissions generated by the project itself. Such models do not demonstrate, with respect to a regional air quality impact, what proportion of these emissions are actually "new" emissions, specifically attributable to the project in question. For most projects, the main contributor to regional emissions is from motor vehicles; however, the quantity of vehicle trips appropriately characterized as "new" is usually uncertain as traffic associated with a project may be relocated trips from other locales. In other words, vehicle trips associated with the 2040 General Plan may include trips relocated from other existing locations, as people begin to use a proposed project instead of similar existing land uses. Therefore, because the proportion of "new" versus relocated trips is unknown, the vehicle trips estimate generated by CalEEMod is used as a conservative, "worst-case" estimate.

Project Impacts and Mitigation Measures

Threshold:	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

IMPACT GHG-1 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN WOULD GENERATE GHG EMISSIONS THAT WOULD NOT EXCEED THE BAAQMD RECOMMENDED THRESHOLD OF 6.6 MT CO_2E. IN ADDITION, POLICIES CONTAINED IN THE 2040 GENERAL PLAN WOULD ENSURE THAT DEVELOPMENT UNDER THE 2040 GENERAL PLAN WOULD FOLLOW A REDUCTION TRAJECTORY THAT MEETS THE 2050 STATEWIDE EMISSIONS TARGET. IMPACTS WOULD THEREFORE BE LESS THAN SIGNIFICANT.

Construction Emissions

Construction activities associated with buildout of the 2040 General Plan would generate temporary short-term GHG emissions primarily due to the operation of construction equipment and truck trips. Construction-related emissions are speculative at the plan level because such emissions are dependent on the characteristics of individual projects. However, GHG emissions would be emitted from travel to and from the worksite and the operation of construction equipment such as graders, backhoes, and generators. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. Construction activity under the 2040 General Plan is assumed to occur until General Plan buildout in 2040. As shown in Table 15, construction activity for the 2040 General Plan would generate approximately 213,123 MT of CO_2e for buildout of the entire plan. Amortized over a 30-year period (the assumed lifetime of the General Plan), construction of the 2040 General Plan would generate an estimated 7,104 MT of CO_2e per year.

Table 15 Estimated Greenhouse Gas Construction Emissions

Emission Source (Phase)	Estimated Annual Emissions (Approximate)[1] (MT CO_2e)
Total Construction Emissions	213,123
Amortized over 30 years	7,104

[1] See Appendix B for calculations and for GHG emission factor assumptions.
MT = metric tons
CO_2e = carbon dioxide equivalent

Operational Emissions

Estimated operational emissions from buildout of the 2040 General Plan (through the year 2040) are shown in Table 16. Estimated GHG emissions associated with the 2040 General Plan would be approximately 81,550 MT CO_2e per year or 5.85 MT CO_2e per person per year. Therefore, the 2040 General Plan would not exceed the efficiency threshold of 6.6 MT CO_2e per person per year.

Table 16 Estimated 2040 General Plan Emissions

Emission Source	Annual Emissions (MT CO_2e)
Construction (Amortized)	7,104
Stationary	
Area	48
Energy	17,694
Solid Waste	2,735
Water	1,726
Mobile (during operations)	
CO_2 and CH_4	49,100
N_2O	3,143
Total	81,550
Service Population	13,925 persons*
Total / Service Population	**5.85 MT CO_2e / service population / year**
Threshold	6.6 MT CO_2e / service population / year
Threshold Exceeded?	No

*See Section 4.12, *Population and Housing,* for estimated population and employment projections from the 2040 General Plan

Sources: See Appendix B for calculations and for GHG emission factor assumptions.

The Draft 2017 Scoping Plan recommends that local governments aim to achieve a community-wide goal of no more than 6 MT CO_2e per capita by 2030 and no more than 2 MT CO_2e per capita by 2050. This goal is consistent with the statewide emissions limits established in AB 32, SB 32, SB 391, and Executive Orders S-3-05 and B-30-15 (CARB 2017). Based on 2020 emissions (127,720 MT CO_2e [Sonoma County 2016]) and emissions from buildout of the 2040 General Plan (81,550 MT CO_2e, see Table 16) there would be a total of 209,270 MT CO_2e Townwide in 2040. The projected population for Windsor in 2040 would be 38,028 persons. Therefore, Windsor per capita emissions would be 5.44 MT CO_2e per person, which is under the 2030 threshold recommended by the Draft 2017 Scoping Plan. Thus 2040 General Plan emissions would be under the 2030 target number recommended by the Scoping Plan Update.

In addition, the 2040 General Plan describes efficiency thresholds for individual projects. The efficiency thresholds for individual projects were calculated in light of the trajectory of state climate change legislation. The efficiency thresholds represent the rate of emissions reduction necessary for individual projects under the 2040 General Plan to achieve their fair share of statewide GHG reduction necessary to meet climate change legislation in 2030, 2040, and 2050. The target efficiency thresholds for projects under the 2040 General Plan were determined by calculating a linear interpolation of state emissions reduction goals.

These thresholds are intended to ensure that projects in Windsor meet the GHG reduction targets and remain on the trajectory for GHG emissions reductions through the year 2050. The project level efficiency targets are listed in Policy ER-5.3 below. For the year 2030 the project level threshold is 1.91 MT CO2e per service population per year, the 2040 threshold is 1.12 MT CO2e per service population per year, and the 2050 target is 0.49 MT CO2e per service population per year. These

efficiency thresholds are the level of project emissions per Windsor service population (population + employees) that would be necessary for the 2040 General Plan to achieve substantial progress towards the long term reduction targets established by state climate change legislation. These targets do not include reductions from state measures since the Scoping Plan Update is not yet adopted. Therefore, these thresholds represent a conservative analysis for compliance with state regulations.

Policies included in the 2040 General Plan would further reduce long- and short-term GHG emissions associated with buildout of the 2040 General Plan. Relevant policies included in the Land Use Element and Environmental Resources Element are listed below.

Land Use Element Goals and Policies

Goal LU-1: Community Design - Encourage well-designed development that preserves and enhances Windsor's community character.

> **Policy LU-1.6** ***Design for Livable Environments*****.** The Town shall maintain design standards and create form-based codes or form-based design standards for specific areas that promote walkable and livable environments.

Goal LU-2: Residential Development - Promote the preservation and development of residential neighborhoods that provide a variety of housing types, densities, and designs that address the diverse needs of Windsor residents of all ages and socio-economic groups.

> **Policy LU-2.5** ***High-Density Residential Areas*****.** The Town shall encourage high-density residential uses to locate in areas close to services and transit.

Goal LU-3: Commercial Development - Promote attractive and vibrant neighborhood, community, and regional commercial centers that provide convenient and enhanced opportunities for shopping, services, entertainment, and social interaction.

> **Policy LU-3.2** ***Connectivity to Neighborhoods*** ~~***High Density Residential Areas***~~**.** The Town shall encourage commercial areas to be linked to adjoining residential neighborhoods by well-designed and attractive streetscapes that have well-designed buildings fronting on tree-lined sidewalks with bicycle paths and street amenities.

Goal LU-4: Mixed-Use Development - Create well-defined nodes of activity containing an integrated mix of commercial, office, and residential uses that enable Windsor residents to live close to businesses and services, reduce automobile use, and actively encourage pedestrian activity.

> **Policy LU-4.1** ~~***High Desnity Residential Areas***~~ ***Mixed-Use Objectives*****.** Mixed Use Objectives. Mixed use projects shall comply with the following objectives:
>
> - A blend of uses that are physically and functionally integrated to create a synergy between different uses and a unique sense of place;
> - Compact development that reduces reliance on automobiles and promotes transit, walking, and biking;
> - Pedestrian-oriented design with active uses built up to the sidewalks;
> - A comfortable public realm that encourages community members to gather and socialize;
> - Increased economic vitality; and

- Crime prevention and security by providing building facades behind sidewalks that provide eyes on the streets.

Environmental Resources Element Goals and Policies

Goal ER-5: Improve the stability and resiliency of Windsor through compliance with local, State, and Federal policies and standards that aim to reduce greenhouse gas (GHG) emissions in the community.

Policy ER-5.1 *Community Greenhouse Gas Reduction*. The Town shall strive to reduce emissions by 25 percent below the 1990 community emissions level by 2020, and further reduce community emissions by:

- 40 percent below the 1990 level by 2030;
- 60 percent below the 1990 level by 2040; and
- 80 percent below the 1990 level by 2050

Policy ER-5.2 *Municipal Services Greenhouse Gas Reduction*. The Town shall strive to reduce municipal emissions by 26.2 percent below the 2000 municipal emissions level by 2020, and further reduce municipal emissions by:

- 40 percent below the 1990 level by 2030;
- 60 percent below the 1990 level by 2040; and
- 80 percent below the 1990 level by 2050

Policy ER-5.3 *Greenhouse Gas Efficiency Target*. The Town shall ensure that all new development projects and Public Works Improvement projects would result in less than 1.91 metric tons CO_2e per service population (including residents and employees) per year from 2017 to 2030, less than 1.12 metric tons CO_2e per service population per year from 2030 to 2040, and 0.49 metric tons CO_2e per service population per year from 2040 to 2050 in order to ensure that the emissions targets for the years 2030, 2040, and 2050 in ER-5.1 and ER-5.2 would be achieved.

Policy ER-5.4 *Encourage Development Patterns that Reduce Greenhouse Gas Emissions*. The Town shall strive to reduce greenhouse gas emissions by encouraging compact, mixed-use, pedestrian/bicycle friendly, transit-oriented development that reduces vehicle miles traveled (VMT); promoting energy efficient building enhancements, construction practices, design, and site planning; improving the job-to-housing ratio; and other methods of reducing greenhouse gas emissions while maintaining a balance of housing types.

Policy ER-5.5 *AB 32 and SB 32 Greenhouse Gas Assessment and Monitoring*. The Town shall continue to assess and monitor performance of greenhouse gas emissions (GHG) reduction efforts beyond the AB 32 designated 2020 goal, including progress towards meeting long-term GHG emissions reduction goals for 2030 (consistent with SB 32) and 2050, as well as the effects of climate change and associated levels of risk, in order to plan a community that is resilient and can adapt to changing climate conditions and its negative impacts.

Policy ER-5.6 *Coordinate with BAAQMD and NSCAPCD*. The Town shall coordinate with BAAQMD and NSCAPCD to ensure projects incorporate feasible mitigation measures to reduce GHG emissions and air pollution, if not already provided for through project design.

Policy ER-5.7 ***Reduce Emissions for Town Operations*****.** The Town shall promote reduced idling, trip reduction, routing for efficiency, carpooling, walking/biking and electric vehicle use for its transportation needs for Town operations.

The policies listed above would reduce GHG emissions associated with buildout of the 2040 General Plan and ensure consistency with state reduction targets. Development facilitated by the 2040 General Plan would be required to meet the 1.91 MT CO_2e per service population per year efficiency target prior to 2030, 1.12 MT CO_2e per service population per year efficiency target from 2030 to 2040, and the 0.49 MT CO_2e per service population per year efficiency target from 2040 to 2050 ensuring reduction of GHG emissions in line with the reduction trajectory that meets the 2050 statewide emissions target. Policies contained in the 2040 General Plan would limit GHG emissions and emissions from development under the 2040 General Plan would not exceed applicable thresholds. Therefore, impacts from GHG emissions would be less than significant.

Mitigation Measure

Mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

IMPACT GHG-2 THE 2040 GENERAL PLAN WOULD BE CONSISTENT WITH MEASURES CONTAINED IN THE WINDSOR GREENHOUSE GAS REDUCTION ACTION PLAN AND WOULD NOT CONFLICT WITH STATE POLICIES OR REGULATIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The 2040 General Plan would be consistent with implementation measures included in the current 2012 Town of Windsor Greenhouse Gas Emission Reduction Action Plan (RAP). The RAP includes 21 implementation measures to reduce GHG emissions Townwide; however, Measures 12 through 21 have already been completed. The remaining Measures 1 through 11 include implementing pool solar, LED streetlights, new vehicle fleets, and solar systems. The 2040 General Plan Environmental Resource Element includes policies to reduce energy use that would help meet the goal of 26 percent below 1990 emissions by 2020. Therefore, the 2040 General Plan would be consistent with the RAP. Relevant energy policies from the Environmental Resources Element are listed below.

Environmental Resources Element Goals and Policies

Policy ER-5.8 ***Energy Conservation and Efficiency Programs*****.** The Town shall promote energy conservation/energy efficiency improvement programs for residential and commercial properties such as those offered by Sonoma County Energy Independence Program (SCEIP) and Property Assessed Clean Energy (PACE) that reduce energy demand which contribute to background levels of regional air emissions and GHG emissions.

Policy ER-5.10 ***Energy Performance Standards*****.** The Town shall require new construction to meet targeted energy performance standards to advance Town greenhouse gas reduction and other sustainability goals and policies identified in the General Plan. The Town will allow new development to select from a range of options to achieve a minimum energy performance standard, including but not limited to:

- Solar easements to guarantee access to increased renewable energy generation;
- Installation of EV charging stations in homes and in commercial development to increase the ability for the public to use zero-emission vehicles;
- Passive heating and cooling building design;
- Solar roof and carport panels;
- Cool roofs;
- Smart appliances;
- Wind generation;
- Installation of energy efficient appliances and fixtures; and
- Other emerging technologies as they become available.

The Town shall work with affordable housing developers to assist in meeting the energy performance standards.

Policy ER-5.11 *Zero Net Energy Goals*. The Town shall strive to implement the State goal of zero net energy (ZNE) in all new residential construction by 2020 and ZNE in all new commercial construction by 2030.

Policy ER-5.12 *Retrofitting Existing Buildings*. The Town shall actively encourage the retrofitting of existing buildings throughout Windsor in order to align those buildings more closely with the Town's energy performance standards.

The 2040 General Plan would not conflict with any State regulations intended to reduce GHG emissions statewide including AB 32 and SB 32, and would be consistent with applicable plans, such as the Town's RAP, designed to reduce GHG emissions. Therefore, the 2040 General Plan would be consistent with State GHG reduction goals including AB 32 and SB 32. Therefore, the 2040 General Plan would not conflict with any plan, policy, or legislation related to GHG emissions.

Mitigation Measure

Impacts would be less than significant; therefore, mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.8 Hazards and Hazardous Materials

This section analyzes impacts associated with exposure to hazards and hazardous materials. Specifically, this analysis addresses impacts related to hazardous materials use and transportation, the accidental release of hazardous materials, new development or re-development on contaminated sites, air traffic hazards, interference with emergency response and evacuation plans, and the risk of exposure to wildland fires.

4.8.1 Setting

Definition of Hazardous Materials

A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency, or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined in Title 22 of the California Code of Regulations as follows:

> A substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported or disposed of or otherwise managed (California Code of Regulations, Title 22, Section 66261.10).

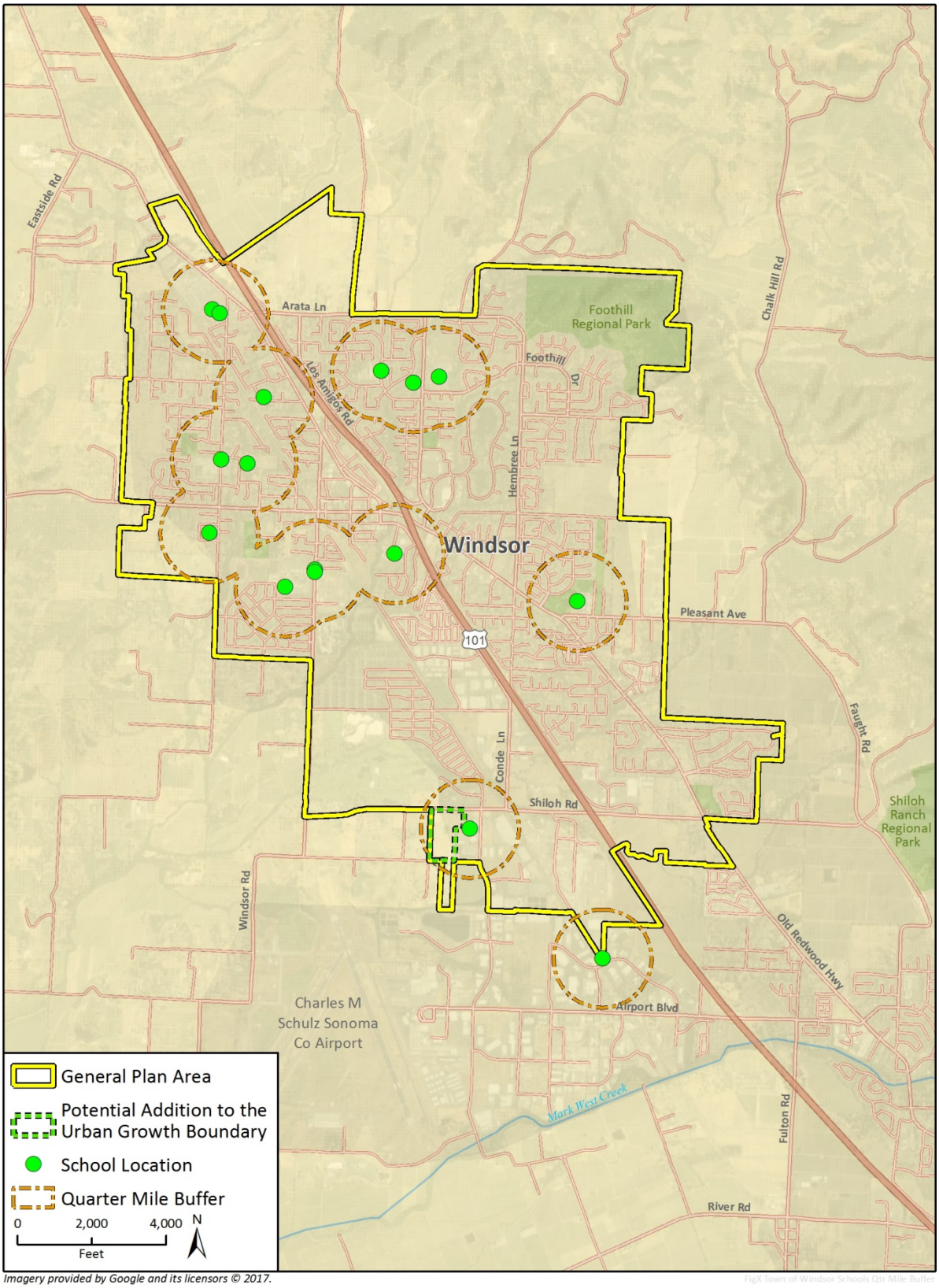
Chemical and physical properties cause a substance to be considered hazardous. Such properties include toxicity, ignitability, corrosiveness, and reactivity. California Code of Regulations, Title 22, Sections 66261.20 through 66261.24 defines the aforementioned properties. The release of hazardous materials into the environment can contaminate soils, surface water, and groundwater supplies.

Land Use Patterns

Small quantities of hazardous materials in Windsor are routinely used, stored, and transported in commercial and retail businesses as well as in educational facilities, hospitals, and households. Hazardous materials users and waste generators in the Town include businesses, public and private institutions, and households. Federal, State, and local agency databases maintain comprehensive information on the locations of facilities using large quantities of hazardous materials, as well as facilities generating hazardous waste. Some of these facilities use certain classes of hazardous materials that require accidental release scenario modeling and risk management plans to protect surrounding land uses.

Past and present land use patterns are good predictors of the potential for past contamination by hazardous materials and the current use and storage of hazardous materials. Industrial sites and certain commercial land uses, such as dry cleaners, are more likely to use and store large quantities of hazardous materials than residential land uses. Land use patterns are also useful for identifying the location of sensitive receptors, such as schools, day-care facilities, hospitals, and nursing homes. In Windsor, industrial and commercial land uses are concentrated along major transportation corridors, such as Highway 101, the Downtown area, and the rail corridor. Schools are distributed fairly evenly throughout the Town as shown on Figure 12, Schools with ¼-Mile Buffer.

Figure 12 Existing Town of Windsor Schools with 1/4-Mile Buffer



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Additional data provided by California Department of Education, 2017.

FigX Town of Windsor Schools Qtr Mile Buffer

Existing Hazardous Material Contamination

Several existing contaminants, including asbestos, lead (in sources such as lead-based paint in buildings or in soil), and contaminated soil and groundwater, may be present in Windsor. Due to the age of some existing buildings in the Town that may be redeveloped under the 2040 General Plan, asbestos may be present in those structures and could be mobilized during demolition activities. Similarly, lead may be present in paint that was sold prior to 1978 or in soil that was contaminated by leaded gasoline or improperly discarded batteries. Existing soil contamination may also be present at potential redevelopment sites due to contamination from household hazardous wastes. The U.S. EPA describes household hazardous waste as leftover household products that can catch fire, react, explode under certain circumstances, or that are corrosive or toxic. Household hazardous wastes are similar to the operational project-related hazardous materials described above, and include products such as paints, cleaners, oils, batteries, and pesticides (U.S. EPA 2016).

The State Water Resources Control Board GeoTracker website identifies Leaking Underground Storage Tanks (LUST) cleanup sites, Cleanup Program Sites (formerly known as Spills, Leaks, Investigations, and Cleanups [SLIC] sites), military sites, land disposal sites (landfills), permitted underground storage tank sites, Waste Discharge Requirement sites, Irrigated Lands Regulatory Program sites, and Department of Toxic Substances Control cleanup and hazardous waste permit sites. A search of the GeoTracker database on February 17, 2017 (SWRCB 2017). In addition, the Department of Toxic Substances Control's (DTSC) Envirostor database was searched on February 17, 2017 for cleanup sites in the Town (DTSC 2017). According to the database search, 1~~1~~0 open or active hazardous waste sites are located in Windsor. These include five LUST sites and six other hazardous waste sites as shown in Table 17.

Table 17 Hazardous Materials Sites in the General Plan Area

Site Name	Address	Site ID	Site Type	Status/Pollutant
Banks Property	340 Windsor River Road	T0609700374	LUST	Site assessment (7/11/2002)
Circle K Store (former)	290 Windsor River Road	T0609700085	LUST	Site assessment (6/2/2016)
Shell Service Station	9033 Old Redwood Highway	T0609700102	LUST	Verification Monitoring (4/16/2015)
Windsor Chevron	9120 Old Redwood Highway	T0609700340	LUST	Site assessment (6/2/2016)
Windsor Fuel	9600 Windsor Road	T0609793129	LUST	Assessment and interim remedial action (6/1/1987)
Caletti Avenue	510,590, 610, 650, and 660 Caletti Avenue	60001813	Envirostor	Evaluation
Ecodyne Cooling	Shiloh Road	49420002	State Response	Refer: RWQCB
Ecodyne Pond	30 Shiloh Road	49240001	State Response	Active
Lakewood Enterprises	930 Shiloh Road	71002776	Tiered Permit	Inactive – needs evaluation
Windsor Elementary	9440, 9490, 9520 Starr Road	49880001	School Investigation	Inactive – needs evaluation

Source: Geotracker, February 17, 2017; Envirostor, February 17, 2017

Airports and Aircraft Hazards

There are no public or private airports in Windsor, however the Charles M. Schulz-Sonoma County Airport is located approximately one mile south of Windsor in central Sonoma County. Much of the southwestern portion of Windsor is inside the area of influence for the airport. The airport currently covers over 1,000 acres in unincorporated Sonoma County and controls another 62 acres under avigation easements. An additional 129 acres is designated for future acquisition, primarily for runway approach protection. In accordance with State law, the County of Sonoma and the Town of Windsor amended their respective general plans and zoning ordinances to incorporate the compatibility criteria and compatibility zones established by the Sonoma County Airport Land Use Commission (ALUC) for Charles M. Schulz-Sonoma County Airport. Section 65302.3 of the Government Code requires general plans and applicable specific plans to be consistent with amended Comprehensive Airport Land Use Plans (CALUP) (Town of Windsor 2015a).

Emergency Response Plans

Presidential Directive HSPD 5 identifies steps for improved coordination in response to incidents and requires a National Response Plan (NRP) and a National Incident Management System (NIMS). NIMS is a comprehensive, national approach to incident management developed to improve the coordination of federal, State and local emergency response nationwide. The State of California's NIMS Advisory Committee issued "California Implementation Guidelines for the National Incident Management System" to assist local governments and other entities to incorporate NIMS into already existing programs, plans, training and exercises.

The foundation of California's emergency planning and response is a statewide mutual aid system which is designed to ensure that adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with a given situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement (California Government Code Sections 8555–8561) requires signatories to the agreement to prepare operational plans to use within their jurisdiction, and outside their area. These plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all state agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

Section 8568 of the California Government Code, the "California Emergency Services Act," states that "the State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof." The Act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the act are further reflected and expanded on by appropriate local emergency ordinances. The Act further describes the function and operations of government at all levels during extraordinary emergencies, including war.

All local emergency plans are extensions of the State of California Emergency Plan. The State Emergency Plan conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by Government Code 8607(a) for managing emergencies involving multiple jurisdictions and agencies (CalEMA 2009a). The SEMS incorporates the functions and principles of the Incident Command System (ICS), the Master Mutual Aid Agreement (MMAA), existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination (CalEMA 2009b). Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs (CalEMA

2009b). The SEMS consists of five organizational levels that are activated as necessary, including: field response, local government, operational area, regional, and state (CalEMA 2009b). The State of California Governor's Office of Emergency Services divides the state into six mutual aid regions. The Town of Windsor is located in Mutual Aid Region II, which includes Del Norte, Humboldt, Mendocino, Sonoma, Lake, Napa, Marin, Solano, Contra Costa, San Francisco, San Mateo, Alameda, Santa Clara, Santa Cruz, San Benito, and Monterey Counties (CalACS 2016).

In an emergency, governmental response is an extension of responsibility and action, coupled with normal day-to-day activity. Normal governmental duties will be maintained, with emergency operations carried out by those agencies assigned specific emergency functions.

In 2010, Windsor adopted the Association of Bay Area Government's (ABAG) Multi-Jurisdictional-Local Hazard Mitigation Plan (MJ-LHMP) as its Local Hazard Mitigation Plan. The goal of the MJ-LHMP is to maintain and enhance a disaster-resistant region by reducing the potential for loss and damage resulting from natural disasters (Town of Windsor 2015a). The Town of Windsor Local Hazard Mitigation Plan (LHMP) focuses on mitigating hazards to reduce the impacts of disasters by identifying effective and feasible actions to reduce the risks of potential hazards (Town of Windsor 2017b).

Wildland Fire Hazards

Many factors contribute to an area being at risk of structural fires in terms of local fire departments' capabilities to control them, including the construction size and type, built-in protection, density of construction, and street widths. The Town's daytime population levels may also add to the congestion and difficulty of ingress and egress of emergency response vehicles. Older homes that were constructed prior to modern building standards and fire code requirements are more susceptible to urban fires.

Topography is an important factor in determining the level of wildland fire risk. Flat, urban areas generally present a lower probability risk of wildland fire compared to hilly, less developed areas. Windsor is surrounded on all sides by wildland or agriculture, which makes the Town vulnerable to fires. The California Department of Forestry and Fire Protection (CAL FIRE) determines a fire hazard severity zone based on the potential fire hazard that is expected to prevail there. Factors that are included in this determination include: fuel (material that can burn), slope, and weather. There are three zones, based on increasing hazard severity: moderate, high, and very high. Moderate hazard zones are typically identified as either wildland areas supporting areas of typically low fire frequency and relatively modest fire behavior, or are developed/urbanized areas with a very high density of nonburnable surfaces including roadways, irrigated lawn/parks, and low total vegetation cover (less than 30 percent) that is highly fragmented and low in flammability (e.g., irrigated, manicured, managed vegetation). CAL FIRE has identified that the northeast and southwest edges of the Town abut a moderate wildland fire hazard. Windsor does not abut nor is adjacent to any designated areas with a high or very high fire severity zone. The Town also has two disconnected islands to the southwest, annexed to provide water reclamation lands. One is located at the intersection of Eastside Road and Trenton-Healdsburg Road and the other at the intersection of Trenton-Healdsburg Road and Mark West Creek; both locations are almost completely surrounded by moderate fire hazard zones. A majority of the Town abuts productive agricultural lands, predominantly vineyards, which have no fire hazard zone associated with them (Town of Windsor 2015a).

CAL FIRE works in cooperation with the Governor's Office of Emergency Services (OES), as well as neighboring state governments through a network of mutual aid agreements to fight wildland fires. CAL FIRE is also a dedicated firefighting partner to the federal government, with experience contributing to firefighting efforts on the 45 million acres of federal lands in California. CAL FIRE is the largest multipurpose fire protection agency in the United States, responsible for wildland fire protection of over 31 million acres of California's privately owned watershed lands, as well as services in 150 counties, cities, and districts via contracts with local governments. CAL FIRE responds to over 5,400 wildland fires each year. CAL FIRE commands a force of approximately 5,300 full-time fire professionals, 1,800 seasonal personnel, and over 5,000 volunteers (CAL FIRE 2016). In addition to its approximately 350 fire engines, CAL FIRE maintains a significant fleet of aircraft that includes twenty-two air tankers, 17 air tactical planes, and 12 helicopters (CAL FIRE 2016).

Agricultural Chemicals

As the community continues to support agricultural production, risks associated with agricultural chemicals such as pesticides and organic /inorganic fertilizers may occur. Residential uses in the proximity of agricultural uses that use pesticides increase the chance of health risks. Agricultural operations are located throughout portions Windsor as discussed in Section 4.2, *Agricultural Resources*. Pesticide application permits are renewed on an annual basis by the County Agricultural Commissioner. Regulated commercial applications of pesticides are documented only on a monthly basis in an annual report submitted to the County. The Sonoma County Agricultural Commissioner's Office receives approximately 40 pesticide complaints annually countywide. About half are from nearby residents affected by agricultural spraying and the other half from those driving by on roadways adjacent to spraying activities (Town of Windsor 2015a).

Regulatory Setting

The management of hazardous materials and hazardous wastes is regulated at federal, state, and local levels, including through programs administered by the U.S. EPA; agencies within the California Environmental Protection Agency (CalEPA), such as the DTSC; Federal and State occupational safety agencies; and the Sonoma County Certified Unified Program Agency (CUPA) Hazardous Materials Unit.

Federal

The Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA)

These acts established a program administered by the U.S. EPA for the regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (HSWA), which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Among other things, the use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by HSWA.

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (enacted 1980), amended by the Superfund Amendments and Reauthorization Act (SARA) (1986)

This law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, CERCLA established requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled revision of the National Contingency Plan (NCP), which provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List (NPL).

The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

FIFRA (7 USC 136 et seq.) provides Federal control of pesticide distribution, sale, and use. EPA was given authority under FIFRA not only to study the consequences of pesticide usage, but also to require users (farmers, utility companies, and others) to register when purchasing pesticides. Later amendments to the law required users to take exams for certification as applicators of pesticides. All pesticides used in the United States must be registered (licensed) by EPA. Registration assures that pesticides will be properly labeled and that, if used in accordance with specifications, they will not cause unreasonable harm to the environment.

Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations

Regulations for Lead-Based Paint (LBP) are contained in the Lead-Based Paint Elimination Final Rule 24 Code of Federal Regulations (CFR) 33, governed by the U.S. Housing and Urban Development (HUD), which requires sellers and lessors to disclose known LBP and LBP hazards to perspective purchasers and lessees. Additionally, all LBP abatement activities must be in compliance with California and Federal OSHA and with the State of California Department of Health Services requirements. Only LBP trained and certified abatement personnel are allowed to perform abatement activities. All lead LBP removed from structures must be hauled and disposed of by a transportation company licensed to transport this type of material at a landfill or receiving facility licensed to accept the waste.

U.S. Environmental Protection Agency

The U.S. EPA is the agency primarily responsible for enforcement and implementation of Federal laws and regulations pertaining to hazardous materials. Applicable Federal regulations pertaining to hazardous materials are contained in the Code of Federal Regulations (CFR) Titles 29, 40, and 49. Hazardous materials, as defined in the CFR, are listed in 49 CFR 172.101. The management of hazardous materials is governed by the following laws:

- Resource Conservation and Recovery Act of 1976 (RCRA) (42 U.S. Code [USC] 6901 et seq.); Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA, also called the Superfund Act) (42 USC 9601 et seq.);
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) (7 USC 136 et. Seq.); and
- Superfund Amendments and Reauthorization Act (SARA) of 1986 (Public Law 99 499).

These laws and associated regulations include specific requirements for facilities that generate, use, store, treat, and/or dispose of hazardous materials. EPA provides oversight and supervision for Federal Superfund investigation/remediation projects, evaluates remediation technologies, and develops hazardous materials disposal restrictions and treatment standards.

State

Department of Toxic Substances Control

As a department of the California EPA, the Department of Toxic Substances Control (DTSC) is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of RCRA and the California Health and Safety Code.

DTSC also administers the California Hazardous Waste Control Law (HWCL) to regulate hazardous wastes. While the HWCL is generally more stringent than RCRA, until the U.S. EPA approves the California program, both state and federal laws apply in California. The HWCL lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Government Code Section 65962.5 requires the DTSC, the State Department of Health Services, the SWRCB, and CalRecycle to compile and annually update lists of hazardous waste sites and land designated as hazardous waste sites throughout the state. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before the lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included.

If any soil is excavated from a site containing hazardous materials, it would be considered a hazardous waste if it exceeded specific criteria in Title 22 of the California Code of Regulations. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

Hazardous Waste Control Act

The hazardous waste management program enforced by DTSC was created by the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in CCR Title 26. The State program is similar to, but more stringent than, the Federal program under RCRA. The regulations list materials that may be hazardous, and establish criteria for their identification, packaging, and disposal. Environmental health standards for management of hazardous waste are contained in California Code of Regulations (CCR) Title 22, Division 4.5. In addition, as required by California Government Code Section 65962.5, DTSC maintains a Hazardous Waste and Substances Site List for the State called the Cortese List.

California Department of Pesticide Regulation, Department of Food and Agriculture, and the Department of Public Health

The California Department of Pesticide Regulations (DPR), a division of CalEPA, in coordination with the California Department of Food and Agriculture (CDFA), a division of Measurement Standards and the California Department of Public Health (CDPH) have the primary responsibility to regulate pesticide use, vector control, food, and drinking water safety. CCR Title 3 requires the coordinated response between the County Agricultural Commissioner and SBDEH to address the use of pesticides used in vector control for animal and human health on a local level. DPR registers pesticides, and pesticide use is tracked by the County. Title 22 is used also to regulate both small (less than 200 connections regulation by the SBC Water District) and large CDPH water systems.

California Fire Building Code (2016)

The 2016 Fire and Building Code establishes the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare for the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of this code apply to the construction, alteration, movement enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout the State of California.

Local

County of Sonoma Agricultural Commissioner

The regulation of pesticide storage, application, and waste disposal is under the jurisdiction of the County Agricultural Commissioner; the Commissioner implements the Cal EPA Department of Pesticide Regulation (DPR) program. Since 1990 the Commissioner's office has compiled reports required of farmers and other users of agricultural pesticides which provide complete, site specific documentation of every pesticide application. These requirements include pesticides used on parks, golf courses, cemeteries, rangeland and pastures, and along roadside and railroad rights-of-way. The reports are transferred to the DPR and entered into a statewide database.

Sonoma County Environmental Health and Safety Department

The Sonoma County Environmental Health and Safety Department protects health, prevents disease, and promotes health for all persons in Sonoma County. The department has programs that employ strategies to prevent health hazards. These include a Leaking Underground Storage Tank oversite program that oversees the investigation and cleanup of fuel releases from underground storage tanks in most areas of the County, including Windsor. Other programs include healthy home programs, septic disposal inspections, and a solid waste program.

4.8.2 Impact Analysis

Methodology and Thresholds of Significance

Methodology

This section describes the potential environmental impacts of the proposed project relevant to hazards and hazardous materials. The impact analysis is based on an assessment of baseline conditions for the Plan Area, including locations of hazardous materials use and storage, existing contaminated sites, air traffic hazards, emergency response and evacuation plan requirements, and the risk of exposure to wildland fires, as described in Subsection 4.8.1, *Setting*. This analysis identifies potential impacts based on the predicted interaction between the affected environment and construction, operation, and maintenance activities related to the predicted development that would occur under the proposed project. This section describes impacts in terms of location, context, duration, and intensity.

Significance Thresholds

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. For the purposes of this EIR, implementation of the proposed project may have a significant adverse impact if it would do any of the following:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area
6. For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area
7. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan
8. 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

Project Impacts and Mitigation Measures

Threshold:	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

IMPACT HAZ-1 IMPLEMENTATION OF THE 2040 GENERAL PLAN COULD RESULT IN AN INCREMENTAL INCREASE IN THE OVERALL ROUTINE TRANSPORT, USE, STORAGE, AND DISPOSAL OF HAZARDOUS MATERIALS WITHIN THE TOWN AND INCREASE THE RISK OF RELEASE OF HAZARDOUS MATERIALS. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS RELATED TO THE HANDLING AND STORAGE OF HAZARDOUS MATERIALS AND ADHERENCE TO PROPOSED 2040 GENERAL PLAN POLICIES WOULD MINIMIZE THE RISK OF SPILLS AND THE PUBLIC'S POTENTIAL EXPOSURE TO THESE SUBSTANCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT

Implementation of the 2040 General Plan would facilitate development in the Town, including conversion of uses in response to market demand, and more intense use of land in several locations throughout the Town focusing on infill development and development on the Town edge. The 2040 General Plan projects that over the next 25 years the Town will add 3,910 new dwelling units and 2,860 new jobs.

The development/redevelopment envisioned for the 2040 General Plan would be primarily residential, commercial, office space, and industrial land uses. As discussed in Section 2, *Project Description*, the number of dwelling units in the Town would increase by 3,910 for a total of 13,544 dwelling units in 2040. Residential and office space land use typically do not use or handle large quantities of hazardous materials.

The Town's desire to develop their economic base while providing jobs for residents in reflected in the 291,410 square feet of industrial space and 226,311 square feet of warehouse that would be added to the Town in the next 22 years. New residential development could be introduced in areas in close proximity to existing and/or future industrial and commercial development, such as in the southern portion of the Town near the railroad tracks.

The precise potential future increase in the amount of hazardous materials transported within the Town of Windsor as a result of implementation of the 2040 General Plan cannot be predicted because specific development projects are not identified in the 2040 General Plan at a level of detail allowing such analysis. This analysis focuses on the potential nature and magnitude of risks associated with the accidental release, storage, transportation, and use of hazardous materials used during operations of typical residential, industrial, and retail-commercial development projects. As described below, compliance with applicable federal and State laws related to the transport, storage and handling of hazardous materials would reduce the likelihood and severity of accidents associated with the use of hazardous materials.

Exposure of persons to hazardous materials could occur in the following ways: improper handling or use of hazardous materials or hazardous wastes during construction or operation of future developments, particularly by untrained personnel; transportation accident; environmentally unsound disposal methods; or fire, explosion or other emergencies. The types and amounts of hazardous materials would vary according to the nature of the activity. In some cases, it is the type of material that is potentially hazardous; in others, it is the amount of material that could present a hazard.

Whether a person exposed to a hazardous substance would suffer adverse health effects depends upon a complex interaction of factors that determine the effects of exposure to hazardous materials: the exposure pathway (the route by which a hazardous material enters the body); the amount of material to which the person is exposed; the physical form (e.g., liquid, vapor) and characteristics (e.g., toxicity) of the material; the frequency and duration of exposure; and the individual's unique biological characteristics such as age, weight, and general health. Adverse health effects from exposure to hazardous materials may be short-term (acute) or long-term (chronic). Acute effects can include damage to organs or systems in the body and possibly death. Chronic effects, which may result from long-term exposure to a hazardous material, can also include organ or systemic damage, but chronic effects of particular concern include birth defects, genetic damage, and cancer. Existing hazardous materials regulations were established at the State level to ensure compliance with federal regulations in order to reduce the risk to human health and the environment from the routine use of hazardous substances.

Although the overall quantity of hazardous materials and waste generated in the Town could incrementally increase as a result of implementation of the 2040 General Plan, all new developments that handle or use hazardous materials would be required to comply with the regulations, standards, and guidelines established by the U.S. EPA, State, Sonoma County, and Town of Windsor related to storage, use, and disposal of hazardous materials.

The California EPA requires all businesses that handle more than specified amounts of hazardous materials to submit business plans through the California Environmental Reporting System (CERS). Specifically, any new business that meets the specified criteria must submit a full hazardous materials disclosure report that includes an inventory of the hazardous materials generated, used, stored, handled, or emitted; and emergency response plans and procedures to be used in the event of a significant or threatened significant release of a hazardous material. The plan needs to identify the procedures to follow for immediate notification to all appropriate agencies and personnel in the event of a release, identification of local emergency medical assistance appropriate for potential accident scenarios, contact information for all company emergency coordinators of the business, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel. The County of Sonoma Fire and Emergency Services Department (FESD) inspects businesses in the Town of Windsor to confirm that their business plan is in order and up to date.

The DOT Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials, as described in Title 49 of the Code of Federal Regulations, and implemented by Title 13 of the CCR. The transport of hazardous materials can result in accidental spills, leaks, toxic releases, fire, or explosion. It is possible that licensed vendors could bring some hazardous materials to and from new residential and retail-commercial sites in the Town of Windsor as a result of development projects carried out under the 2040 General Plan. However, appropriate documentation for all hazardous waste transported in connection with specific project-site activities would be provided as required for compliance with existing hazardous materials regulations codified in Titles 8, 22, and 26 of the California Code of Regulations, and their enabling legislation set forth in Chapter 6.95 of the California Health and Safety Code. In addition, individual developers would be required to comply with all applicable federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to, Title 49 of the Code of Federal Regulations.

California Building Code requirements prescribe safe accommodations for materials that present a moderate explosion hazard, high fire or physical hazard, or health hazards. Compliance with all

applicable federal and State laws related to the storage of hazardous materials would maximize containment (through safe handling and storage practices described above) and provide for prompt and effective cleanup if an accidental release occurs.

For those employees that would work with hazardous materials, the amounts of hazardous materials that are handled at any one time are generally relatively small, reducing the potential consequences of an accident during handling. Further, specific project-site activities would be required to comply with federal and State laws to eliminate or reduce the consequence of hazardous materials accidents. For example, employees who would work around hazardous materials would be required to wear appropriate protective equipment, and safety equipment is routinely available in all areas where hazardous materials are used.

The County of Sonoma FESD personnel respond to hazardous materials incidents in the Town of Windsor. Major hazardous materials accidents associated with residential, industrial, and retail-commercial uses are fairly infrequent, and additional emergency response capabilities are not anticipated to be necessary to respond to the potential incremental increase in the number of incidents that could result from implementation of the proposed project. Further, adherence to applicable regulations as discussed above would be required to reduce any potential consequences of a hazardous materials operational accident.

As discussed in Section 4.2, *Agricultural Resources*, buildout of the 2040 General Plan would result in new development adjacent to agricultural production. The regulation of pesticide storage, application, and waste disposal is under the jurisdiction of the County Agricultural Commissioner. The Sonoma County Agricultural Commissioner regulates agriculture and pesticide use in the General Plan Area and pesticide application permits must be renewed yearly. In addition, regulated commercial applications of pesticides are documented on a monthly basis in an annual report submitted to the County. Agriculture production within and adjacent to the General Plan Area must comply with all Cal-DPR pesticide regulations including pesticide registration and work requirements.

Goals and policies in the 2040 General Plan Public Health and Safety (PHS) Element listed below would minimize any impacts related to the use, storage, transport, and release of hazardous materials in the Town. The 2040 General Plan policies would ensure safe transportation of hazardous waste by maintaining designated truck routes for the transport of hazardous materials. In addition, Policy PHS-5.8 encourages coordination with applicable rail companies to understand the potential impacts of wastes to the community allowing the Town to adequately respond if a spill should to occur. Specific policies in the 2040 General Plan would ensure proper storage and disposal of hazardous materials to reduce potential contamination impacts (Policies PHS 5.1, 5.3, and 5.4). Finally, the 2040 General Plan Goal PHS-5 encourages proper use of hazardous materials through policies to enforce hazardous materials regulations and provide setbacks between sensitive uses and hazardous material sites.

Public Health and Safety Element Goals and Policies

Goal PHS-5: Hazardous Materials. Minimize potential health effects from the use, storage, transportation and disposal of hazardous materials and waste.

> **Policy PHS-5.1** ***Proper Storage and Disposal of Hazardous Materials*****.** The Town shall require proper storage and disposal of hazardous materials to prevent leakage, potential explosions, fires, or the escape of harmful gases, and to prevent individually innocuous materials from combining to form hazardous substances, especially at the time of disposal.

Policy PHS-5.2 ***Setbacks and Buffers*****.** The Town shall review applications for commercial and industrial uses that involve the use, storage, transport, or disposal of hazardous materials to determine the need for buffer zones or setbacks to minimize risks to homes, schools, community centers, medical facilities, and other sensitive uses.

Policy PHS-5.3 ***Hazardous Waste Disposal in Sphere of Influence*****.** Due to the sensitivity of the Windsor Sphere of Influence area to seismic and flood hazards, and the reliance on groundwater for the Town's potable water supply, the Town shall not permit hazardous waste disposal facilities within the Sphere of Influence.

Policy PHS-5.4 ***Hazardous Waste Disposal*****.** The Town shall encourage the community to dispose of toxic substances at the Central Disposal Site in Petaluma or through one of the Community Toxic Collection days.

Policy PHS-5.5 ***Sensitive Uses*****.** The Town shall encourage the community to dispose of toxic substances at the Central Disposal Site in Petaluma or through one of the Community Toxic Collection days.

Policy PHS-5.6 ***PG&E Gas Line Coordination*****.** The Town shall coordinate with Pacific Gas and Electric (PG&E) to maintain public awareness and public safety in areas that are in proximity to high-pressure gas lines, while remaining sensitive to the needs of the community.

Policy PHS-5.7 ***Maintain Truck Routes*****.** The Town shall maintain designated truck routes for the transportation of hazardous materials through the town to limit potential impacts to public health and safety.

Policy PHS-5.8 ***Rail Transport of Hazardous Materials*****.** The Town shall coordinate with Sonoma Marin Area Rail Transit Authority (SMART), North Coast Rail Authority, and Northwestern Pacific Railroad Company on the notification of hazardous materials or waste being transported through town and the potential impacts that these materials or wastes pose to the community.

Policy PHS-5.9 ***Onsite Contamination Constraints*****.** In future land use decisions, the Town shall consider the constraints imposed by the potential for site contamination by present or past activities that used, stored, or disposed of hazardous materials or wastes. The Town shall restrict any use that could allow human exposure to such contamination or shall require remediation and/or mitigation efforts to reduce the health risks to acceptable levels prior to issuance of a building permit.

Policy PHS-5.12 ***Underground Storage Tanks*****.** The Town shall continue to encourage and support the local Fire Department, the Sonoma County Environmental Health Department under the CUPA program, and the Regional Water Quality Control Board to administer and enforce hazardous material regulations for the storage of hazardous liquids in underground storage tanks.

Policy PHS-5.13 ***Hazardous Waste Management Planning*****.** The Town shall continue to maintain the appropriate measures and policies in the Sonoma County Countywide Integrated Waste Management Plan: Household Hazardous Waste Element that are directly related to the Town.

Policy PHS-5.14 ***Hazardous Materials Education*****.** The Town shall educate the public on safety precautions and measures when handling and disposing of hazardous materials, including future modifications to local and regional hazardous material management.

Policy PHS-5.15 ***Emergency Plans for Businesses*****.** The Town shall require businesses that use hazardous materials on the premises to prepare and implement a plan in the event of an

emergency. The Plan shall identify an individual or individuals who will serve as the emergency coordinator(s).

Compliance with existing applicable regulations and 2040 General Plan policies would ensure that risks from routine use, transport, handling, storage, disposal, and release of hazardous materials would be minimized. Oversight by the appropriate federal, State, and local agencies and compliance by new development with applicable regulations related to the handling and storage of hazardous materials would minimize the risk of the public's potential exposure to these substances. Therefore, impacts from a hazard to the public or the environmental through routine transport, use or disposal of hazardous materials would be less than significant.

Mitigation Measures

No mitigation would be required.

Significance after Mitigation

Impacts would be less than significant without mitigation.

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

IMPACT HAZ-2 IMPLEMENTATION OF THE PROPOSED PROJECT COULD RESULT IN HAZARDOUS EMISSIONS OR HANDLING OF HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ¼ MILE OF AN EXISTING OR PROPOSED SCHOOL, BUT COMPLIANCE WITH EXISTING REGULATORY REQUIREMENTS WOULD MINIMIZE RISKS TO SCHOOLS AND STUDENTS, RESULTING IN A LESS THAN SIGNIFICANT IMPACT.

Under the 2040 General Plan, the increase of residential, industrial, and commercial uses could increase the quantity of sensitive receptors in areas adjacent to industrial and commercial land uses, thereby potentially increasing the risk of exposure to hazardous materials, waste, or emissions. New commercial development, including gas stations, dry cleaners, and auto-body shops, could occur within ¼-mile of an existing school. Consequently, hazardous materials sites may be located within ¼-mile from school sites.

Since the 2040 General Plan does not include any specific development projects, the quantity of hazardous materials proposed for use by future commercial developments within the Town is currently unknown. Accidental release or combustion of hazardous materials at new commercial and industrial developments could endanger residents or students in the surrounding community.

Public educational services within Windsor are provided by the Windsor Unified School District (WUSD). WUSCD oversees eight schools and employs over 450 people (Town of Windsor 2015a). Figure 12 shows the locations of school facilities in the town as well as a ¼-mile radius surrounding each school. Locations of schools throughout the Town can also be seen in Figure 4, 2040 General Plan Land Use Map in Section 2, *Project Description*.

Given the built-out conditions in the Town and the distribution of schools in the Town, it is probable that Windsor Creek Elementary School, Windsor High School, and Sonoma Country Day School currently exist within ¼-mile of a facility that has or could emit hazardous air emissions or handle hazardous materials or wastes. It is equally likely that future development and redevelopment associated with the proposed project may result in an increase in hazardous emissions and handling of hazardous materials and wastes within ¼-mile of an existing or future proposed school. However,

the California Education Code (Section 17210 et seq.) outlines the requirements for siting school facilities near or on known or suspected hazardous materials sites, or near facilities that emit hazardous air emissions, handle hazardous or acutely hazardous materials, substances, or waste.

Hazardous materials and waste generated from future development would not pose a health risk to nearby schools because all businesses that handle or have on-site storage of hazardous materials would be required to comply with the provisions of the California Fire Code adopted by the Town (Code of the Town of Windsor Section 1-6-1-202) and any additional elements as required in the California Health and Safety Code Article 1 Chapter 6.95 for Business Emergency Plan. As described in the Regulatory Setting above, both the federal and State governments require all businesses that handle more than a specified amount of hazardous materials to submit a business plan to a regulating agency. As such, compliance with the provisions of the California Fire Code and existing applicable State and federal regulations would minimize the risks associated with exposure of sensitive receptors to hazardous materials. Impacts would be less than significant.

Mitigation Measures

No mitigation would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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

IMPACT HAZ-3 IMPLEMENTATION OF THE 2040 GENERAL PLAN COULD RESULT IN DEVELOPMENT ON SITES CONTAMINATED WITH HAZARDOUS MATERIALS. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS RELATING TO SITE CLEANUP AND 2040 GENERAL PLAN POLICIES WOULD MINIMIZE IMPACTS FROM DEVELOPMENT ON CONTAMINATED SITES, RESULTING IN A LESS THAN SIGNIFICANT IMPACT.

Existing sites that may potentially contain hazardous land uses in the Town include large and small-quantity generators of hazardous waste, such as gas stations. As noted previously, 11 sites containing or potentially containing hazardous materials contamination are located within Windsor. These sites include LUST and other hazardous materials sites that are listed by DTSC. Three gas stations and two other sites are listed as LUST sites while Windsor Creek Elementary is listed as a school investigation site (DTSC 2017). Any new development occurring on these documented hazardous materials sites listed in Table 17 would be preceded by remediation and cleanup under the supervision of the DTSC before construction activities could begin. In addition, the 2040 General Plan contains policies related to contaminated sites. Policy PHS-5.9 encourages the Town to consider the constraints imposed by the potential for site contamination when approving projects and to restrict any use that would allow human exposure to hazardous contamination. If a contaminated site would be developed the policy requires remediation and/or mitigation. Other PHS Element policies in the 2040 General Plan require sites contaminated with hazardous materials to cooperate with the RWCQB, DTSC, and other appropriate agencies (Policy PHS-5.10) and encourage the Town to support programs and funding determination of hazardous sites (Policy PHS-5.11).

It is also possible that underground storage tanks (USTs) that were in use prior to permitting and record keeping requirements may be present in the Town. If an unidentified UST were uncovered or

disturbed during construction activities, it would be closed in place or removed. Removal activities could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank contents or vapors. Potential risks, if any, posed by USTs would be minimized by managing the tank according to existing Sonoma County standards as enforced and monitored by the Department of Environmental Health and Safety. The extent to which groundwater may be affected, if at all, depends on the type of contaminant, the amount released, and depth to groundwater at the time of the release. If groundwater contamination is identified, remediation activities would be required by the RWQCB prior to the commencement of any new construction activities. If contamination exceeds regulatory action levels, the developer would be required to undertake remediation procedures prior to grading and development under the supervision of the County Environmental Health and Safety Department or RWQCB (depending upon the nature of any identified contamination). Compliance with existing state and local regulations as well as implementation of 2040 General Plan policies would reduce impacts to less than significant.

Mitigation Measures

No mitigation would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area or be located within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area.

IMPACT HAZ-4 THE SOUTHERN PORTION OF WINDSOR IS INSIDE THE AREA OF INFLUENCE FOR THE CHARLES M. SHULTZ-SONOMA COUNTY AIRPORT AND COULD RESULT IN SAFETY HAZARDS FOR PEOPLE WORKING OR RESIDING IN THE AREA OF INFLUENCE. IMPACTS WOULD BE AVOIDED THROUGH IMPLEMENTATION OF GOALS AND POLICIES IN THE 2040 GENERAL PLAN AND HAZARDOUS IMPACTS TO PEOPLE WORKING AND RESIDING WITHIN THE AIRPORT AREA OF INFLUENCE WOULD THEREFORE BE LESS THAN SIGNIFICANT.

There are no public or private airports within the General Plan Area. The nearest airport is the Charles M. Shultz-Sonoma County Airport located in central Sonoma County, approximately one mile south of Windsor. The southwestern portion of Windsor is inside the area of influence for the airport. The County has land use jurisdiction over the unincorporated areas surrounding the airport. Additionally, as owner of the airport, the County has control over the operation and development of the facility. Windsor has land use control over the incorporated areas within the established town boundary (Figure 4).

The airport is operated by the County of Sonoma Department of Transportation and Public Works, and serves many different types of aircraft including propeller aircraft, turbine aircraft, jets, helicopters, and hot air balloons. The airport currently covers approximately 1,048 acres and features two runways that have direct flight paths over Windsor. The Airport Land Use Commission (ALUC) oversees potential development and regulation that can affect airport expansion and the compatibility with surrounding land uses. The ALUC governs the Sonoma County Airport through the Comprehensive Airport Land Use Plan (CALUP). The CALUP is intended to protect and promote the safety and welfare of residents near the public use airports in the county, as well as airport users,

while promoting the continued operation of the six airports covered by the plan. Section 65302.3 of the Government Code requires general plans and applicable specific plans to be consistent with amended CALUPs. In accordance with State law, the County of Sonoma and the Town of Windsor amended their respective general plans and zoning ordinances to incorporate the compatibility criteria and compatibility zones established by the ALUC for Charles M. Schulz-Sonoma County Airport. The 2040 General Plan PHS Goal 6 and related policies, listed below, would minimize hazards associated with the daily operations of the airport.

Public Health and Safety Element Goals and Policies

Goal PHS-6: Airport Safety. Minimize the risks to lives and property due to operations associated with the Charles M. Schultz Airport.

Policy PHS-6.1 ***Sonoma County Airport Land Use Compatibility Criteria*****.** The Town shall continue to establish noise and safety compatibility criteria in the Airport Safety (AS) overlay district consistent with the provisions of the Comprehensive Airport Land Use Plan for Sonoma County.

Policy PHS-6.2 ***Development Proposal Review*****.** The Town shall review development proposals and land uses within the "AS" overlay district for compliance with district regulations and modify or condition projects as necessary to maintain compliance.

Policy PHS-6.3 ***Sonoma County Airport Land Use Compatibility Plan Consistency*****.** The Town shall ensure its policies, plans, and ordinances are consistent with the Airport Land Use Compatibility Plan.

Policy PHS-6.4 ***Airport Land Use Commission Review*****.** The Town shall ensure that all applicable plans, ordinances, and development applications are submitted to the Sonoma County Airport Land Use Commission (ALUC) for review, if required by State law.

Policy PHS-6.5 ***Airport Open Space Requirements*****.** Maintain the open space areas shown on Figure PHS-4 to satisfy the open land area requirements of the California Airport Land Use Planning Handbook (Caltrans Aeronautics Division) and the Sonoma County Comprehensive Airport Land Use Plan for lands located within a designated "Traffic Pattern Zone" area.

Public Health and Safety policies in Goal 6 would reduce safety hazards associated with buildout of the 2040 General Plan. Specifically, Policy PHS-6.1 which would establish safety criteria in Airport Safety zones and Policy PHS-6.2 which would review development proposals in Airport Safety zones to ensure that they are compatible with district regulations. Compliance with the CALUP and applicable 2040 General Plan policies would reduce airport hazards within the Town and impacts would be less than significant.

Mitigation Measures

No mitigation would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

IMPACT HAZ-5 THE 2040 GENERAL PLAN POLICIES ADDRESS MAINTAINING A LOCAL HAZARD MITIGATION PLAN AND EMERGENCY ACCESS IMPLEMENTATION. THEREFORE, THE PROPOSED PROJECT WOULD NOT RESULT IN INTERFERENCE WITH THESE TYPES OF ADOPTED PLANS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Public Health and Safety Element of the 2040 General Plan directs the Town to accommodate safety needs when planning and designing, while increasing the resiliency of the Town's residents and businesses to respond to and be prepared for potential emergencies. This would include emergency vehicle assess and location of emergency response facilities. The 2040 General Plan Goal Public Health and Safety (PHS) 1 and related policies, listed below, would ensure adequate emergency response within Windsor.

Public Health and Safety Element Goals and Policies

Goal PHS-1: Emergency Response and Preparedness. Maintain a high level of emergency preparedness to respond to natural or human-caused disasters.

Policy PHS-1.1 ***Hazard Mitigation Plan*****.** In accordance with Government Code Section 65302 g (4) the Town will continue to maintain a Local Hazard Mitigation Plan that identifies the hazards, risks, and vulnerabilities to natural disasters and strategies on how to prevent, prepare, and mitigate potential impacts. This plan shall address climate change and adaptation strategies as required under this government code section.

Policy PHS-1.2 ***Locating Emergency Response Facilities and Infrastructure*****.** The Town shall ensure that emergency response facilities and infrastructure are located to avoid hazardous areas (e.g., seismically prone areas and FEMA 100-year flood zone), and designed to remain functional following a major natural or human-made disaster. When the location of emergency facilities and infrastructure in such areas cannot be avoided, effective measures should be implemented to minimize potential damage and public inconvenience.

Policy PHS-1.3 ***Emergency Vehicle Access*****.** The Town shall require adequate primary and alternative access for emergency vehicles be provided to all new developments and be maintained for existing development.

Policy PHS-1.4 ***Public Awareness and Action During an Emergency*****.** The Town shall promote public awareness of possible natural and man-made hazards, measures that can be taken to protect lives and property, response plans, and evacuation routes. The public awareness effort should emphasize that during and immediately after an emergency individual readiness and self-sufficiency are critical.

In addition, the Town of Windsor Fire Protection District reviews and approves projects to ensure that emergency access meets Town standards. Implementation of 2040 General Plan policies and actions associated with emergency planning and response, in addition to Fire District Review would ensure that potential impacts from implementation of the proposed project on emergency response and evacuation would be less than significant.

Mitigation Measures

No mitigation would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	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

IMPACT HAZ-6 IMPLEMENTATION OF THE PROPOSED PROJECT COULD RESULT IN DEVELOPMENT IN URBANIZED AREAS ADJACENT TO WILDLANDS. HOWEVER, IMPLEMENTATION OF POLICIES INCLUDED IN THE 2040 GENERAL PLAN, WOULD REDUCE THE EXPOSURE OF PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH INVOLVING WILDLAND FIRES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Town of Windsor is surrounded by wildland or agriculture, which makes the Town potentially vulnerable to wildland fire. The combination of dry summers, the growing effects of climate change, moderate topography in the northeastern edge, grasslands, and woodlands provide highly flammable fuel conducive to wildfires. As shown in Figure 13, CAL FIRE has identified that the northeastern and southwest edges of the Town abut a moderate wildland fire hazard. In addition, an area in the eastern portion of the Town has a moderate fire hazard. Moderate hazard zones are identified as either wildland areas supporting areas of typically low fire frequency and relatively modest fire behavior, or are developed/urbanized areas with a very high density of non-burnable surfaces, such as roadways. The two disconnected islands to the southwest in the General Plan Area are almost completely surrounded by moderate fire hazards. The vineyards and productive agricultural land that abut the majority of the Town boundary have no fire hazard zone associated with them (Town of Windsor 2015a).

The Windsor Fire Protection District services the Town of Windsor and approximately 25 square miles of area outside Windsor in the unincorporated areas of Sonoma County serving over 30,000 residents. Station 1 is located at 8200 Old Redwood Highway and Station 2, constructed in 2008, is located at 8600 Windsor Road (Figure 13).

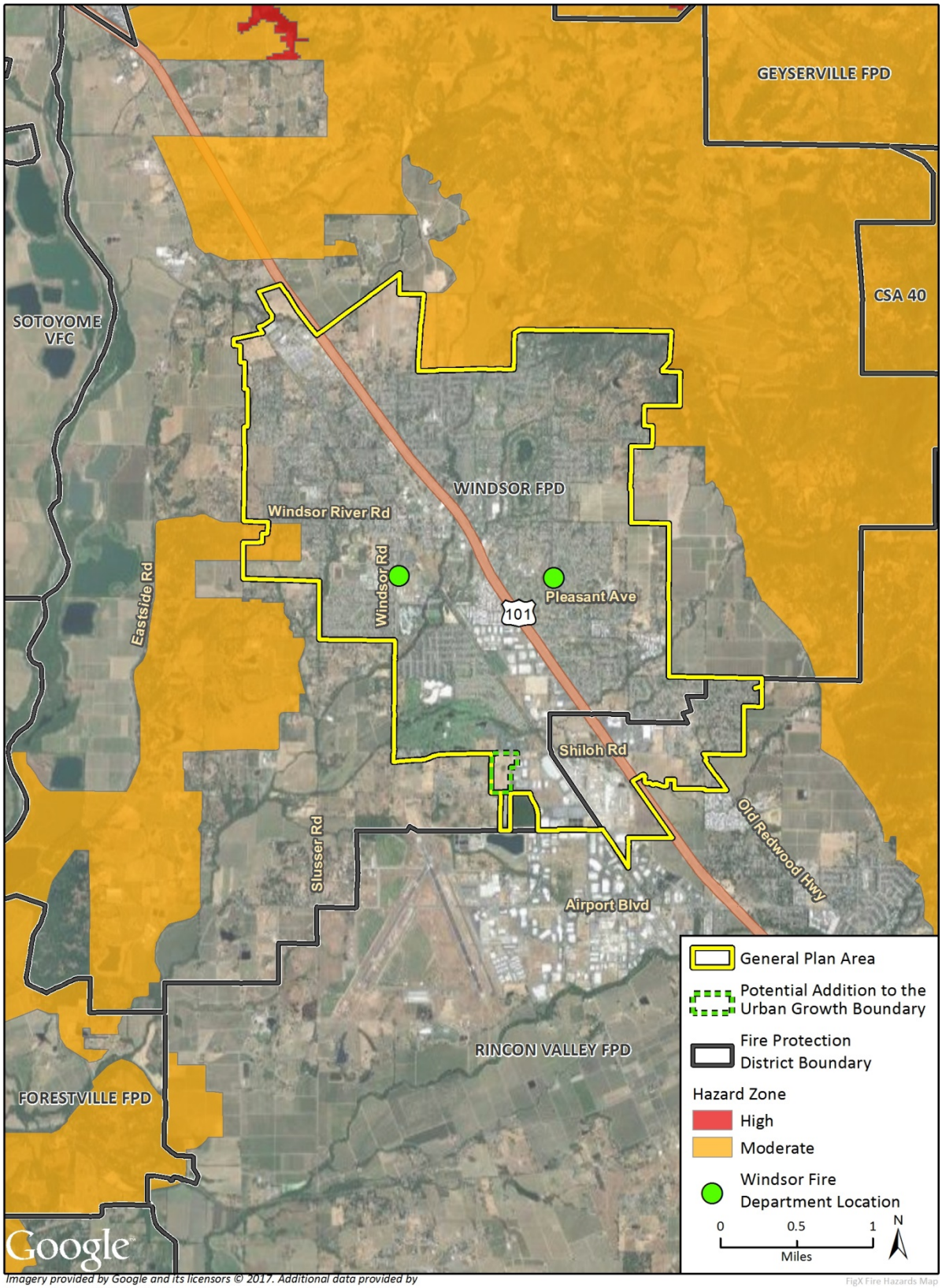
Implementation of the proposed project could lead to an increase in residential, commercial, or industrial development in areas that are susceptible to wildland fires. Goals and policies contained with the Public Health and Safety Element of the General Plan provide guidance for preventative measures and practices to avoid wildfires.

Public Health and Safety Element Goals and Policies

Goal PHS-4: Fire Hazards. Minimize the risks to lives and properties due to wildland fire hazards through education and an understanding of the natural environment.

> **Policy PHS-4.1** ***Fire Protection Design for New Development*****.** New development adjacent to heavily grassed and semi-arid hillsides shall be designed to minimize fire hazards to life and property, including the use of fire preventative site design (i.e., defensible space), landscaping and building materials, and fire suppression techniques.

Figure 13 Fire Hazards



Imagery provided by Google and its licensors © 2017. Additional data provided by Sonoma County, 2014; Cal Fire Fire and Resource Assessment Program, 2007.

Policy PSH-4.2 *County Fire Hazard Reduction Programs*. In areas beyond the town limits designated as high fire hazard by Cal Fire, the Town shall encourage the County to undertake or continue programs to minimize fuel buildup around residences and other occupied structures. Such programs should include the establishment and maintenance of a fuel break between fire risk areas and urbanized areas.

Policy PSH-4.3 *Fire Suppression Requirements*. The Town shall require additional mitigation for development projects unable to satisfy minimum fire flow requirements.

Policy PHS-4.4 *Fire Interjurisdictional Coordination*. The Town shall encourage the County to incorporate any measures provided by the fire protection service providers as conditions of project approval for projects in unincorporated areas located within a moderate or high fire hazard area.

Policy PHS-4.6 *Project Review for Proposals in Fire Hazard Areas*. The Town shall require that fire hazards be identified during project review by comparing the project site against the fire hazard maps prepared by Cal Fire. Project sites that lie within the moderate to high hazard areas shall be subject to design modifications and conditions to minimize potential exposure to wildland fire.

Policy PHS-4.7 *Weed Abatement*. The Town shall continue to support the Fire District's efforts to maintain and implement a Weed Abatement program to prevent fire hazards created by vegetative growth.

The 2040 General Plan policies would reduce risks from wildland fires by reducing fire risks in the Town with weed abatement and project proposal review in fire hazard areas. In addition, the policies ensure that the Town is prepared for fires by coordinating fire efforts with Sonoma County and applying mitigation to projects unable to satisfy minimum fire flow requirements. With implementation the fire hazard policies in the 2040 General Plan, impacts would be less than significant

Mitigation Measures

No mitigation would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.9 Hydrology and Water Quality

This section evaluates the potential environmental effects related to hydrology and water quality associated with implementation of the proposed project. It discusses the regional and local watershed characteristics, including water quality, drainage and infiltration patterns, and flood hazards. The analysis includes a review of surface water, groundwater, flooding, storm water, and water quality. Water supply and wastewater conveyance and treatment are discussed in Section 4.15, *Utilities and Service Systems*. Issues regarding wetlands and waters of the U.S. are discussed in Section 4.4, *Biological Resources*.

4.9.1 Setting

The Town of Windsor is located in the Russian River Valley approximately seven miles northwest of the City of Santa Rosa and five miles southeast of the City of Healdsburg. The town lies within the Coast Range Geomorphic Province. This province is characterized by parallel northwest trending mountain ranges formed over the past 10 million years or less by active uplift related to complex tectonics of the San Andreas fault/plate boundary system (CGS 2002).

The elevation in the Town of Windsor ranges from approximately 120 feet in the plain to approximately 430 feet in the foothills to the east. The Russian River and Dry Creek valleys merge north of Windsor and combine to form a large alluvial plain known as the Santa Rosa Plain (Town of Windsor 2015a). Windsor is located on the northern boundary of the Santa Rosa Plain, which is generally flat with a gentle slope to the southwest (USGS 2017). Streamflow within the Santa Rosa Plain watershed is highly variable, with high winter flows and very low to zero flows in the summer (USGS 2013). Streamflow in this area is characterized as having a rapid response to precipitation, meaning that runoff quickly follows storm events and moves rapidly through the watershed. Sheet flow, or non-channelized flow, in the Town is collected by a storm drain system that discharges into local creeks. Major drainages in the Town, such as Windsor Creek, flow to the southwest and eventually drain to the Russian River, which flows into the Pacific Ocean near Jenner, California (USGS 2017).

Windsor is characterized by a typical Mediterranean climate, generally dry in the summer with mild, wet winters. Average summer temperatures in degrees Fahrenheit are in the 80s, with highs in the low 90s and lows in the mid 50s. Average winter temperatures are in the upper 40s and low 50s, with highs in the upper 50s to low 60s and lows in the upper 30s to low 40s. Most rainfall occurs between November and March, with an average annual rainfall of 42 inches. The wettest months of the year are January and February, with an average rainfall of 8.65 and 8.08 inches, respectively (Idcide.com 2017).

Surface Water

The California Department of Water Resources (DWR) divides surface watersheds in California into 10 hydrologic regions. Windsor lies within the North Coast Hydrologic Region (HR), a large coastal watershed in northern California (CAL FIRE 2004). The North Coast HR spans approximately 12.46 million acres and is bounded on the west by the Pacific Ocean, on the north by the Oregon border, on the east by the Sacramento River HR, and on the south by the San Francisco Bay HR (DWR 2003).

The DWR further subdivides Hydrologic Regions into Hydrologic Units, and further into Hydrologic Areas and Hydrologic Subareas (HSA). Within the North Coast Hydrologic Region, Windsor is located

within the Russian River Hydrologic Unit (CAL FIRE 2004). The North Coast Regional Water Quality Control Board (NCRWQCB) governs basin planning and water quality within the Russian River Hydrologic Unit (NCRWQCB 2011). Within the Russian River Hydrologic Unit, the Town is located almost entirely within the Middle Russian River Hydrologic Area. Within the Middle Russian River Hydrologic Area, the Town occupies the Mark West HSA. A very small area in the northwestern corner of the Town is located in the Lower Russian River Hydrologic Area. Within the Lower Russian River Hydrologic Area, the Town occupies the Guerneville HSA (CAL FIRE 2004).

Windsor includes both undeveloped open space with natural drainage features and urban development with altered drainage systems, such as underground storm water systems. The two National Hydrography Dataset named streams that flow within the Town's boundaries include Pool Creek and Windsor Creek (USGS 2017). Other notable locally-named streams that flow through the Town include East Windsor Creek, Pruitt Creek, and Starr Creek (Town of Windsor 2015a). These streams are shown in Figure 14. All of these creeks are tributaries to Windsor Creek and flow in a southwesterly and westerly direction, beginning in the foothills of the Mayacamas Mountains to the east and crossing the Santa Rosa Plain towards the Russian River (USGS 2017). For a description of jurisdictional features, including wetlands, that are located within the Town, see Section 4.4, *Biological Resources*.

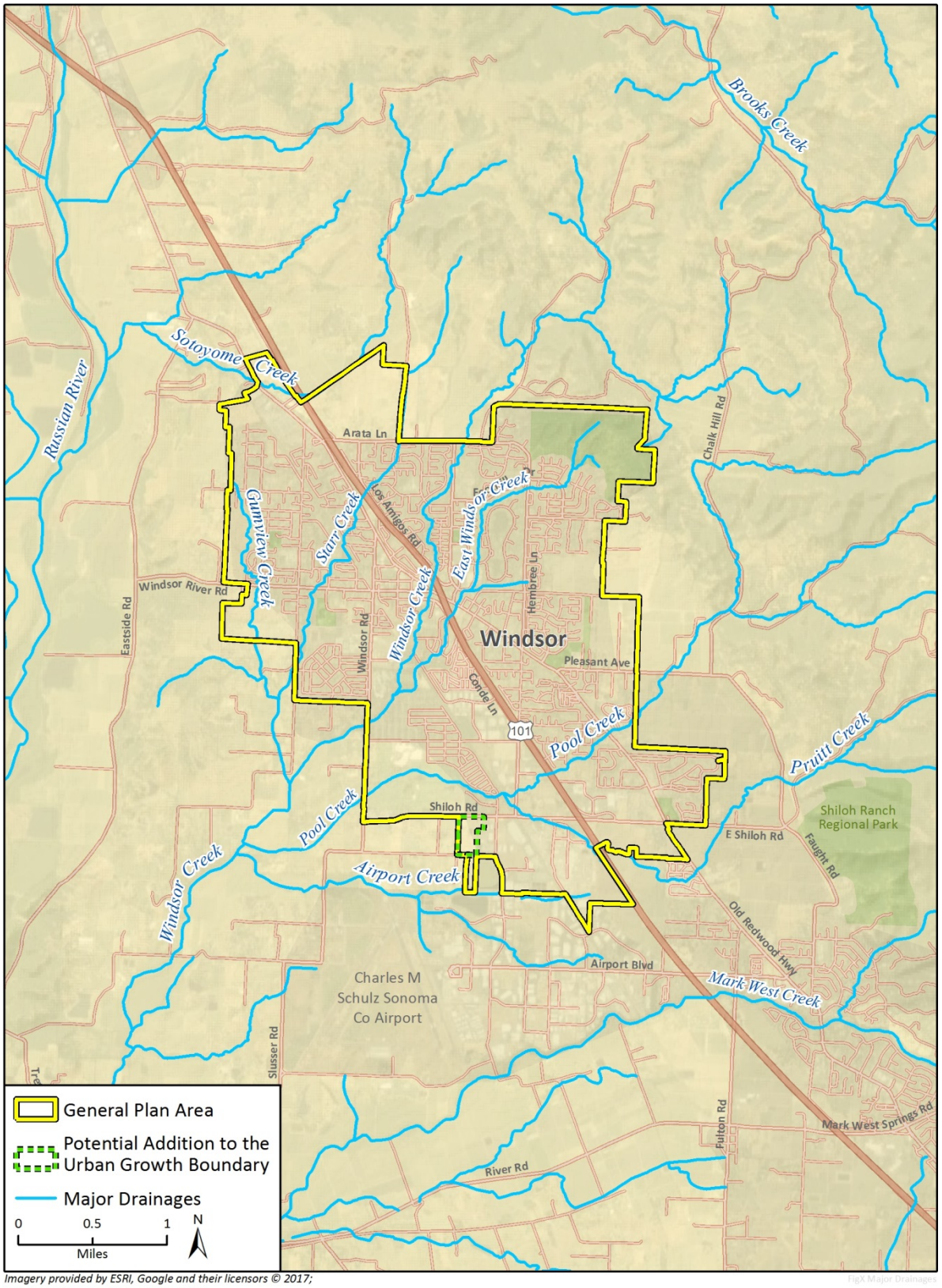
Groundwater

Windsor is underlain by the Santa Rosa Plain Subbasin of the Santa Rosa Valley Groundwater Basin (DWR 2004). The Santa Rosa Plain Groundwater Subbasin is composed of three water-bearing units: the Wilson Grove Formation (the principal water-bearing unit in the subbasin); the Glen Ellen Formation; and alluvium (Town of Windsor 2015a). The Santa Rosa Plain Subbasin underlies approximately 125 square miles of surface area and is bounded on the northwest by the Russian River plain and the Healdsburg subbasin; on the west by the Mendocino Range; on the south by a drainage divide that separates the Santa Rosa Valley from the Petaluma Valley basin; and on the east by the Sonoma Mountains, the Mayacamas Mountains, and a groundwater divide that separates the Rincon Valley subbasin (DWR 2004).

The Santa Rosa Plain Subbasin has an estimated storage capacity of approximately 4.313 million acre-feet (DWR 2004) Approximately 3.91 million acre-feet of groundwater was estimated to be in storage in 1980 (DWR 2004). A modeled groundwater budget for the subbasin from 1976 to 2010 found that average recharge from rainfall and streams was approximately 73,000 acre-feet per year, which represented approximately 90 percent of recharge for the subbasin (SRPBAP 2014). The model also found that groundwater pumping increased from a long-term (1976-2010) average of 36,000 acre-feet per year to 42,000 acre-feet per year between 2004 and 2010, mainly due to increased rural pumping (SRPBAP 2014). The modeled groundwater budget estimated a total groundwater storage loss of 120,000 acre-feet from 1976 to 2010, which is a small percentage of both total groundwater storage and the long-term average recharge rate (SRPBAP 2014). Current management efforts seek to increase the amount of recharge and promote the sustainable use of groundwater (SRPBAP 2014).

Overall water quality in the subbasin is good and is generally acceptable for beneficial uses, although several constituents of potential concern present challenges on a localized basis (DWR 2004; SRPBAP 2014). Groundwater quality in the basin is discussed in more detail below under the heading *Drinking Water Quality*.

Figure 14 Major Drainages



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Additional data provided by USGS, 2017.

Water Supply

The Town's potable water supply has been provided primarily from Windsor Water District wells in the Russian River Well Field, through a Sonoma County Water Agency (SCWA) Russian River water right, and a connection to the SCWA's aqueduct from which the Town purchases wholesale water (Town of Windsor 2015a). See Section 4.15, *Utilities and Service Systems*, for additional details about water supply and demand for Windsor.

Water Quality

Storm Water and Urban Runoff

Water quality in the Town is governed by the North Coast Regional Water Quality Control Board (NCRWQCB), which sets water quality standards in the Water Quality Control Plan for the North Coast Region (Basin Plan). The Basin Plan identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses. The identified beneficial uses and the water quality objectives to maintain or achieve those uses are together known as water quality standards. In general NCRWQCB identifies beneficial uses for a complete hydrologic area or subarea, rather than for individual waterbodies. Within Windsor, the NCRWQCB Basin Plan identifies beneficial uses for the Guerneville HSA and the Mark West HSA (NCRWQCB 2011). The beneficial uses identified for the Mark West HSA apply to all of the streams within that HSA, including Windsor Creek and all of its tributaries. Table 18 presents the beneficial uses for surface waters within the Town.

Table 18 Basin Plan Beneficial Uses

Waterbody	Beneficial Uses
Guerneville Hydrologic Subarea	Municipal and Domestic Supply (MUN)[a], Agricultural Supply (AGR)[a], Industrial Service Supply (IND)[a], Industrial Process Supply (PRO)[b], Groundwater Recharge (GWR)[a], Freshwater Replenishment (FRSH)[a], Navigation (NAV)[a], Hydropower Generation (POW)[b], Water Contact Recreation (REC1)[a], Non-Contact Water Recreation (REC2)[a], Commercial and Sport Fishing (COMM)[a], Warm Freshwater Habitat (WARM)[a], Cold Freshwater Habitat (COLD)[a], Wildlife Habitat (WILD)[a], Rare, Threatened, or Endangered Species (RARE)[a], Migration of Aquatic Organisms (MIGR)[a], Spawning, Reproduction, and/or Early Development (SPWN)[a], Shellfish Harvesting (SHELL)[b], Estuarine Habitat (EST)[a], Aquaculture (AQUA)[b]
Mark West Hydrologic Subarea	(MUN)[a], (AGR)[a], (IND)[a], (PRO)[b], (GWR)[a], (FRSH)[a], (NAV)[a], (POW)[b], (REC1)[a], (REC2)[a], (COMM)[a], (WARM)[a], (COLD)[a], (WILD)[a], (RARE)[a], (MIGR)[a], (SPWN)[a], (SHELL)[b], (AQUA)[b]

[a] Existing beneficial use.

[b] Potential beneficial use.

Source: NCRWQCB Water Quality Control Plan for the North Coast Region, 2011

The Clean Water Act (CWA) 303(d) list is a register of impaired and threatened waters which the CWA requires all states to submit for Environmental Protection Agency approval. The list identifies all waters where the required pollution control measures have so far been unsuccessful in reaching or maintaining the required water quality standards. Waters that are listed are known as "impaired." CWA Section 303(d) lists both the Guerneville HSA and Mark West HSA as impaired by

sedimentation/siltation and high water temperature (SWRCB 2012). A Total Maximum Daily Load (TMDL) for each of these impairments is required but none has been established yet.

Storm water runoff may play a role in the water quality impairments described above. Runoff that occurs as overland flow across yards, driveways, and public streets, open space, and agricultural land is intercepted by the storm water drainage system and conveyed to local drainages before eventually being routed to the Pacific Ocean via the Russian River. This storm water can carry pollutants, including sediment, that can enter the local waterways and result in the types of water quality impairments described above. Common sources of sediment in storm water include construction sites and other disturbed soils.

Drinking Water Quality

As described above under the heading *Water Supply*, Windsor mainly sources its drinking water from several wells located adjacent to the Russian River and through a direct connection to the Sonoma County Water Agency aqueduct. Drinking water in Windsor is of high quality and meets or exceeds the EPA's and California Division of Drinking Water's Maximum Contaminant Level (MCL) thresholds for all constituents of concern (Town of Windsor 2016a). The Town's drinking water does contain moderately high concentrations of calcium carbonate, which results in water hardness (Town of Windsor 2016a). However calcium carbonate in the drinking water does not result in an adverse health effect.

Flood Hazards

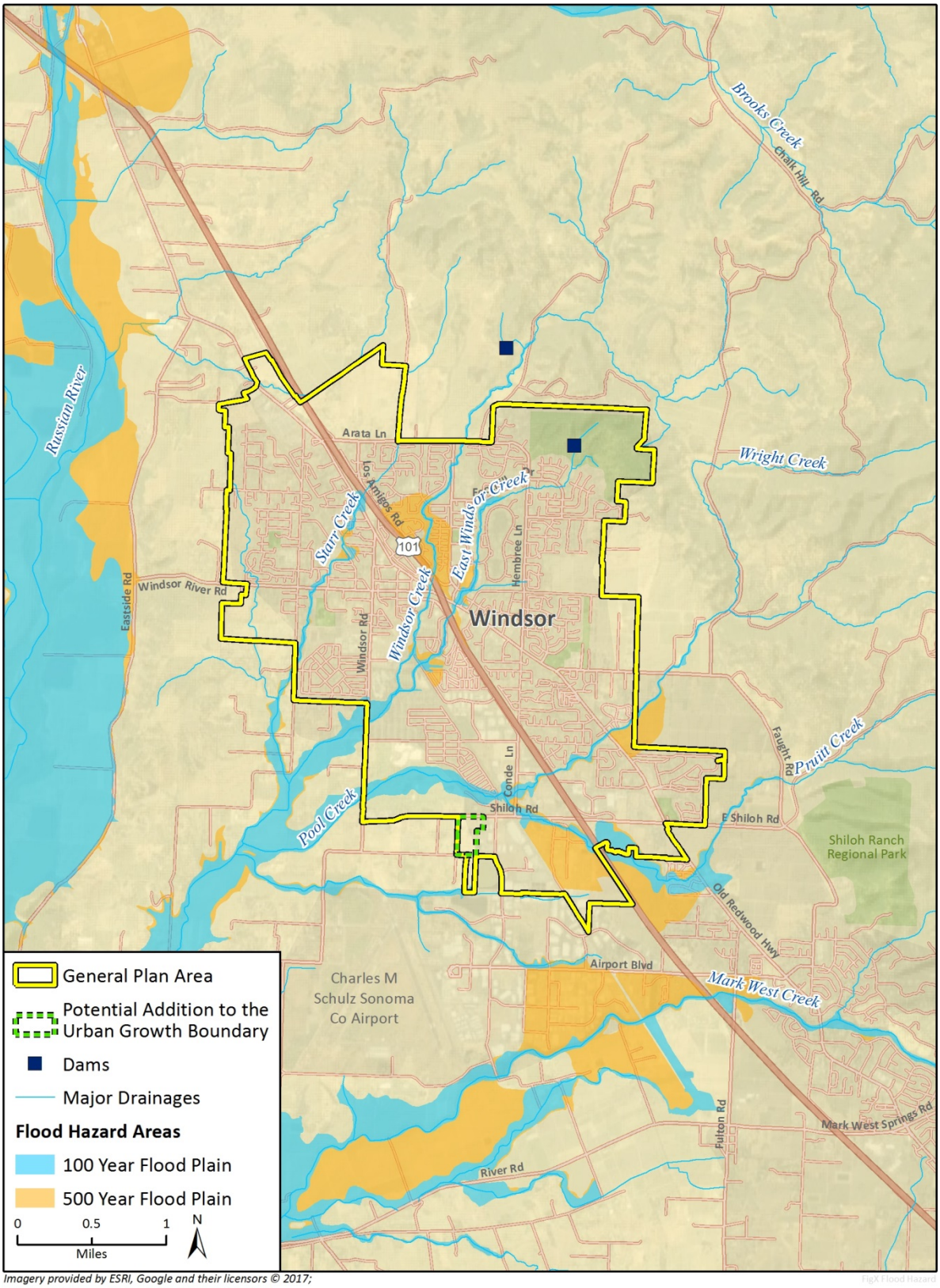
Flood hazards can occur when the amount of rainfall exceeds the infiltration capacity of the surrounding landscape or the conveyance capacity of the storm water drainage system. Flood risk is defined as an annual percent-chance of flooding, or the probability that flooding would occur in any given year. Although a 100-year flood will, on average, occur once every 100 years, the probability of a 100-year flood is 1% for any particular year. Two 100-year floods could occur in the same year or even in the same month, but the likelihood that two 100-year flood events would occur consecutively is very small.

Areas that are subject to flood risk are identified by the Federal Emergency Management Agency (FEMA) on the National Flood Hazard Layer. As shown in Figure 15, most of the Town is not subject to flooding from either a 500-year storm or a 100-year storm (FEMA 2017). A few small areas in the southeastern and central parts of the Town are subject to flood from a 500-year storm, and several relatively small areas associated with the main streams that cross the Town are subject to flooding from a 100-year storm and are designated as Special Flood Hazard Areas (FEMA 2017). These Special Flood Hazard Areas run north to south through the central portion of the Town and east to west through the southern portion of the Town (FEMA 2017). The largest Special Flood Hazard Areas are located in the southern portion of town and are associated with Pool Creek and Pruitt Creek (FEMA 2017).

Dam Inundation

Parts of Windsor would be subject to inundation following the failure of any one of four nearby dams owned and operated by others, including Foothill Regional Park Dam, Lagunita 1427 Dam, Shiloh Ranch Dam, and Warm Springs Dam (Town of Windsor 2017b). Warm Springs Dam is the largest of these four dams and is located approximately 16 miles northwest of the Town. Warm Springs Dam can hold back a maximum of 381,000 acre-feet of water, and failure of this dam would

Figure 15 Flood Hazard Areas



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Additional data provided by USGS, 2017; FEMA, 2017.

result in inundation of the western half of the Town (Town of Windsor 2017b). The other three dams hold back much smaller amounts of water and failure of those dams would result in inundation of much smaller portions of the Town (Town of Windsor 2017b).

Regulatory Setting

Federal

Clean Water Act

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the NPDES permit process (CWA Section 402). NPDES permitting authority is administered by the California State Water Resources Control Board (SWRCB) and its' nine Regional Water Quality Control Boards (RWQCB). The General Plan Area is within a region administered by the NCRWQCB.

Individual projects within the Town that disturb more than one acre would be required to obtain NPDES coverage under the California General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) describing Best Management Practices (BMP) the discharger would use to prevent and retain storm water runoff. The SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a waterbody listed on the 303(d) list for sediment.

Section 401 of the CWA requires that any activity that would result in a discharge into waters of the U.S. be certified by the RWQCB. This certification ensures that the proposed activity does not violate State and/or federal water quality standards. Section 404 of the CWA authorizes the U.S. Army Corps of Engineers to regulate the discharge of dredged or fill material to the waters of the U.S. and adjacent wetlands. Discharges to waters of the U.S. must be avoided where possible, and minimized and mitigated where avoidance is not possible. Section 303(d) of the CWA requires states to establish TMDL programs for streams, lakes and coastal waters that do not meet certain water quality standards.

National Flood Insurance Act/Flood Disaster Protection Act

The National Flood Insurance Act of 1968 made flood insurance available for the first time. The Flood Disaster Protection Act of 1973 made the purchase of flood insurance mandatory for the protection of property located in Special Flood Hazard Areas. These laws are relevant because they led to mapping of regulatory floodplains and to local management of floodplain areas according to guidelines that include prohibiting or restricting development in flood hazard zones.

State

California Porter Cologne Water Quality Control Act

The Porter Cologne Water Quality Control Act of 1967 requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for State waters within the Town are contained in the Water Quality Control Plan for the North Coast Region (NCRWQCB 2011). The Water Quality Control Plan, or Basin Plan, protects designated beneficial uses of State waters through the issuance of Waste Discharge Requirements (WDRs) and through the development of Total Maximum Daily Loads (TMDLs). Anyone proposing to discharge waste that could affect the quality of the waters of the State must make a report of the waste discharge to the RWQCB or SWRCB as appropriate, in compliance with Porter-Cologne.

California Streambed Alteration Agreement

Sections 1600–1616 of the California Fish and Game Code require that any entity that proposes an activity that would divert or obstruct the natural flow of any river, stream or lake; change or use any material from the bed, channel, or bank of, any river, stream, or lake; or, deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake, must notify the CDFW. The CDFW would require a Lake or Streambed Alteration Agreement if the Department determines that the alteration may adversely affect fish and wildlife resources. The Agreement includes conditions necessary to protect those resources. The Agreement applies to any stream, including ephemeral streams and desert washes.

Sustainable Groundwater Management Act

In September 2014, Governor Brown signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act (SGMA) gives local agencies the power to sustainably manage groundwater and requires Groundwater Sustainability Plans (GSPs) to be developed for medium- and high-priority groundwater basins. Windsor is part of the Santa Rosa Plain Groundwater Sustainability Agency (GSA), which was formed in June 2017 (Sonoma County Sustainable Groundwater Management n.d.). The Santa Rosa Plain GSP will be updated as part of the legislation and may include continuing to implement recommended GSP actions, such as those in the stakeholder and monitoring and modeling components (Sonoma County Water Agency 2017).

Local

Code of the Town of Windsor

The Code of the Town of Windsor contains regulations pertaining to development in a floodplain and protection of structures from flood hazards (Title IX, Chapter 1) as well as regulations governing storm water quality (Title IX, Chapter 4). Regulations related to flood hazards include flood protection measures such as anchoring and waterproofing below the base flood elevation, restrictions on the alteration of natural floodplains, stream channels, and natural protective barriers, controls on filling, grading, dredging, and other development that may increase flood damage, and limitations on the construction of flood barriers that would divert floodwaters and increase flood hazards in other areas. Regulations related to storm water quality include the

prohibition of non-storm water discharges to the Town's storm drain system and Best Management Practices to reduce and/or prevent soil erosion and sedimentation of local streams.

4.9.2 Impact Analysis

Methodology and Thresholds of Significance

Methodology

This section describes the potential environmental impacts of the proposed project relevant to hydrology and water quality. The impact analysis is based on an assessment of baseline conditions for the proposed project area, including climate, topography, watersheds and surface waters, groundwater, and floodplains, as described above under Subsection 4.9.1, *Setting*. This analysis identifies potential impacts based on the predicted interaction between the affected environment and construction, operation, and maintenance activities related to the predicted development that would occur under the 2040 General Plan, and recommends mitigation measures, when necessary, to avoid or minimize impacts.

Significance Thresholds

The following thresholds of significance are based on Appendix G to the CEQA Statute and Guidelines. For the purposes of this EIR, implementation of the proposed project may have a significant adverse impact if it would:

1 Violate any water quality standards or waste discharge requirements

2 Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)

3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site

4 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site

5 Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff

6 Otherwise substantially degrade water quality

7 Place housing 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

8 Place within a 100-year flood hazard area structures which would impede or redirect flood flows

9 Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam

10 Expose people or structures to significant risk or loss, injury or death involving inundation by seiche, tsunami, or mudflow

Project Impacts and Mitigation Measures

Threshold:	Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade water quality.

IMPACT HYD-1 CONSTRUCTION AND OCCUPANCY OF NEW STRUCTURES UNDER THE 2040 GENERAL PLAN COULD RESULT IN A DISCHARGE OF POLLUTANTS TO SURFACE WATERS OR CONTAMINATION OF SHALLOW GROUNDWATER THROUGH INCREASED SOIL DISTURBANCE AND EROSION, DISCHARGE OF CONTAMINATED WASTEWATER OR STORM WATER, OR ACCIDENTAL SPILLS OR LEAKS OF HAZARDOUS MATERIALS. COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS AND IMPLEMENTATION OF THE GOALS AND POLICIES OF THE 2040 GENERAL PLAN WOULD MINIMIZE THE POTENTIAL FOR WATER QUALITY DEGRADATION AND WOULD REDUCE THIS IMPACT TO A LESS-THAN-SIGNIFICANT LEVEL.

Construction activities facilitated by the 2040 General Plan could include road improvements and realignments, installation and realignment of utilities, demolition of existing structures for replacement, new development, and the potential replacement and/or improvement of drainage facilities. Water quality degradation from construction would be specific to each construction site. The topography of the site, the amount of soil disturbance, the duration that disturbed soil would be exposed, the amount of rainfall and wind that would occur during construction, and the proximity of the nearest waterbody all affect the potential for water quality degradation during construction. New development under the 2040 General Plan would be limited to the General Plan Area and infill development would be prioritized, which would minimize that amount of new infrastructure that would be required.

Construction of future developments could result in soil erosion due to earth-moving activities such as excavation and trenching for foundations and utilities, soil compaction and moving, cut and fill activities, and grading. If not managed properly, disturbed soils would be susceptible to high rates of erosion from wind and rain, resulting in sediment transport via storm water runoff from the construction sites. The types of pollutants contained in runoff from construction sites would be typical of urban areas, and may include sediments and contaminants such as oils, fuels, paints, and solvents. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported to downstream drainages and ultimately into collecting waterways, contributing to degradation of water quality.

Individual construction activities that disturb one or more acres of land surface are subject to the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) adopted by the SWRCB. Compliance with the permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit conditions require development of a SWPPP, which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-storm water management controls. Inspection of construction sites before and after storms is also required to identify storm water discharge from the construction activity and to identify and implement erosion controls, where necessary. Compliance with the Construction General Permit is reinforced through the Code of the Town of

Windsor, which requires the development of an erosion and sediment control plan that is equivalent to the required SWPPP.

The Code of the Town of Windsor also requires an erosion and sediment control plan for construction sites that disturb less than one acre. The erosion and sediment control plan must contain BMPs to reduce or prevent erosion, such as vegetation preservation, silt fencing, fiber rolls, sand bag barriers, gravel bag berms, and stockpile management. Grading on slopes greater than 10 percent is prohibited between October 1 and April 30, unless an exemption is granted. Adherence to the requirements of the Code of the Town of Windsor would reduce the potential for new construction under the 2040 General Plan to cause erosion and the subsequent sedimentation of local streams by ensuring proper management of loose and disturbed soil.

The Windsor Public Works Director or designee has the authority to inspect facilities when a reasonable belief exists that there may be a violation of storm water or other pollutant discharge conditions. The Public Works Director or designee is authorized to issue a notice of violation, cease and desist order, stop work order, and/or compliance order for a violation of the Town's storm water and pollutant discharge requirements. Violations of the Town's discharge prohibitions may be enforced by civil action brought by the Town.

Construction activities, including excavation and trenching related to development, may encounter shallow groundwater. In the event that shallow groundwater is encountered, dewatering of the excavation or trenching site may be required. If improperly managed, these dewatering activities could result in discharge of contaminated groundwater. In accordance with the Waste Discharge Requirements for Low Threat Discharges to Surface Waters in the North Coast Region (Order No. R1-2009-0045; General NPDES Permit No. CA0024902), contaminated groundwater would be treated prior to discharge or disposed of at an appropriate disposal facility or wastewater treatment plant. The Code of the Town of Windsor prohibits illicit discharges to the municipal storm water system, including discharges of contaminated groundwater. Also, discharges of dewatered groundwater to a water of the state would require authorization under a NPDES permit from the NCRWQCB. Compliance with existing regulations would ensure that impacts related to water quality degradation through the discharge of dewatered groundwater would be less than significant.

In addition to concerns about the discharge of contaminated groundwater, construction and operation of development projects carried out under the 2040 General Plan could contaminate the groundwater basin through direct introduction of pollutants or through infiltration of contaminants. Common sources of groundwater contamination include leaking underground storage tanks, septic systems, oil fields, landfills, and general industrial land uses. Implementation of the 2040 General Plan would not involve construction of oil fields or landfills. In general, new development and redevelopment projects would be required to discharge waste to a sanitary sewer system. A small number of rural residential developments may discharge waste to a septic tank or alternative wastewater disposal system. Illicit discharges of waste to the municipal storm water conveyance system, which could subsequently infiltrate into the underlying aquifer, would be prohibited by Code of the Town of Windsor.

Compliance with the regulations and policies discussed above would reduce the risk of water degradation within Windsor from soil erosion and other pollutants related to construction activities. Because violations of water quality standards would be minimized, impacts to water quality from construction activities facilitated by the proposed project would be less than significant.

Operation of future development facilitated by the 2040 General Plan could potentially result in the addition of contaminants into both the storm water runoff entering the Town's storm water

drainage system and the wastewater stream entering the local wastewater collection and treatment system. If storm water controls are not designed or managed properly, runoff from urban development could contain contaminants such as oil, grease, metals, and landscaping chemicals (pesticides, herbicides, fertilizers, etc.) that could enter the Town's storm water drainage system and ultimately degrade surface water and groundwater quality. Illicit discharges to the municipal storm water system are prohibited by the Code of the Town of Windsor, and any entity found to be engaging in illicit discharges may be held liable for the cost of clean-up and remediation. Despite the Code of the Town of Windsor prohibition related to illicit discharges, the possibility of illicit discharges to the municipal storm water system cannot be eliminated completely. The Code of the Town of Windsor also contains requirements for new development and redevelopment projects to minimize pollutants in storm water runoff. These requirements include Best Management Practices, such as erosion control, revegetation, stream setbacks, and parking lot cleaning, which are detailed in the Town's Phase II NPDES Storm Water Management Plan. The Code of the Town of Windsor storm water discharge requirements are designed to achieve compliance with the NCRWQCB's NPDES permit and Waste Discharge Requirements for MS4 Discharges (Order No. R1-2015-0030; NPDES No. CA0025054). Discharges to the Town's storm water conveyance system that would not be covered by the MS4 general NPDES permit would be required to obtain coverage under an individual NPDES permit or comply with individual Waste Discharge Requirements, as approved by the NCRWQCB.

In addition to compliance with mandatory Clean Water Act and Code of the Town of Windsor requirements, implementation of 2040 General Plan goals and policies would further reduce the potential for water quality degradation. Implementation of the following 2040 General Plan goals and policies would help to prevent discharges of contaminated storm water and reduce the potential for violations of water quality standards or waste discharge requirements:

Land Use and Community Design Goals and Policies

Goal LU-1: Community Design. Encourage well-designed development that preserves and enhances Windsor's community character.

> **Policy LU-1.2** ***Preserve Natural Features*****.** The Town shall preserve valuable natural features, such as oaks and waterways, within urbanized areas and clearly define the Town's form to distinguish between urban areas and the surrounding rural and agricultural areas.

Public Facilities and Services Goals and Policies

Goal PFS-4: Storm Water Drainage. Improve the Town's storm water drainage system to reduce excess runoff, reduce impacts to water quality, and protect environmentally sensitive areas.

> **Policy PFS-4.1** ***Storm Water Management Plan*****.** The Town shall maintain and implement a Storm Water Management Plan, which is designed to protect water quality through implementation of best management practices for storm water runoff from development.
>
> **Policy PFS-4.3** ***Low Impact Development*****.** The Town shall provide requirements for Low Impact Development (LID) techniques for reducing pollutants in storm water from new development and reconstruction projects and implement LID in conjunction with the policies specified by the State Water Resources Control Board (SWRCB) and National Pollutant Discharge Elimination System (NPDES) Permit regarding storm water runoff, treatment and collection.

Policy PFS-4.4 ***Education on Storm Water Runoff Effects*****.** The Town shall encourage educational opportunities for citizens regarding storm water runoff, its impacts to water quality, and strategies to mitigate impacts.

Policy PFS-4.5 ***Construction Activities and Grading Effects on Water Quality*****.** The Town shall develop and implement policies that support erosion control and reduce water quality impacts resulting from grading and construction activities.

Environmental Resources Goals and Policies

Goal ER-1: Open Space. Preserve open space land for the continuation of commercial agricultural and productive uses, the protection and use of natural resources, the enjoyment of scenic beauty and recreation, and the protection from natural hazards.

Policy ER-1.1 ***Open Space Preservation*****.** The Town shall seek to preserve open space resources (i.e., productive farmlands, outdoor recreation areas, biological habitats, visually prominent landforms, Alquist-Priolo Special Study Zones, and flood hazard areas) through avoidance of development in these areas.

Policy ER-1.2 ***Sensitive Habitat Preservation*****.** The Town shall encourage the preservation of sensitive environmental habitat areas, such as oak woodlands, productive farmlands, riparian (creekside) corridors, through measures such as clustering development and conservation easements.

Policy ER-1.3 ***Reducing Development in Significant Threat Areas*****.** The Town shall ensure that areas that pose significant threats to public health and safety, such as steep slopes, regulatory floodways, and the Alquist-Priolo Special Study Zone, are pre-dominantly maintained as open space.

Goal ER-3: Water Resources. Protect, manage, and improve natural creek habitats and the quality of the Town's surface water and groundwater resources.

Policy ER-3.1 ***Preservation of Waterways*****.** Whenever possible, creeks should be conserved in, or restored to, their natural states to carry storm waters, to maintain a natural appearance, and to protect fisheries. Portions of the channels that have been significantly altered for flood control should still be used for urban open space.

Policy ER-3.2 ***Development Along Creeks*****.** The Town shall protect, preserve, and improve creeks by requiring that development activities along creeks be conducted using Low Impact Development (LID) principles, appropriate creek setbacks, and Best Management Practices that seek to minimize the discharge of sediments and urban pollutants into the waterways and that are consistent with the NPDES permit.

Policy ER-3.3 ***Creek Maintenance*****.** The Town shall manage and improve Windsor's natural creek system as an important natural, fishery, and visual resource by maintaining the creeks in their natural state, encouraging their incorporation into a trail system, and keeping them free and clear of debris, refuse and other man-made pollutants.

Policy ER-3.4 ***State and Federal Water Quality Programs*****.** The Town shall actively support its storm water NPDES permit by developing and implementing programs for improving and maintaining water quality.

Policy ER-3.5 ***Coordination of Water Standards and Management*****.** The Town should actively support Federal and State laws pertaining to the Clean Water Act, Porter-Cologne Water Quality Control Act, and Sustainable Groundwater Management Act in attainment of water quality standards and management of surface water and groundwater.

Policy ER-3.6 ***Abandonment of Wells*****.** The Town shall continue to properly abandon municipal wells that are no longer serving back-up or monitoring roles and shall continue to cooperate with Sonoma County on the proper abandonment of private wells by private property owners in order to eliminate a potential pathway to contaminate the groundwater.

Goal ER-6: Biological Resources. Protect unique and sensitive biotic features such as rare and endangered plant and animal species, dense oak woodlands, and vernal pools, and encourage sensitive design in these areas.

Policy ER-6.6 ***Prohibition of Certain Activities in Riparian Habitats*****.** The Town shall prohibit dumping or disposal of refuse; confinement of livestock; and structural improvements except necessary water supply projects, flood control projects, fish and wildlife enhancement projects, trail projects, road and bridge projects, and utility projects in significant riparian areas.

Public Health and Safety Goals and Policies

Goal PHS-2: Seismic and Geologic Hazards. Minimize the risk to lives and property due to geologic and seismic hazards.

Policy PHS-2.2 ***Development on Steep Slopes*****.** The Town shall discourage development in areas with slopes of 20 percent or greater to reduce the potential impacts of erosion and slope instability. New development proposed on slopes of 20 percent or greater shall provide an assessment of the site slope stability, susceptibility to landslide, and erodibility prepared by a certified engineering geologist. The Town shall require mitigation measures as necessary based on the site assessment.

Goal PHS-5: Hazardous Materials. Minimize potential health effects from the use, storage, transportation and disposal of hazardous materials and waste.

Policy PHS-5.5 ***Sensitive Uses*****.** The Town shall require new developments that use or store hazardous materials and that are on sites in close proximity to creeks to include mitigation measures to prevent contamination of the creeks in the event of an accident or spill.

Compliance with 2040 General Plan goals and policies and Mitigation Measure GEO-1 would maximize infiltration of storm water (Policies PFS-4.3 and ER-3.4), minimize storm water runoff (Policies PFS-4.1, PFS-4.4, ER-3.4, and ER-3.5), require development setbacks along creeks and near flood hazard areas (Policies LU-1.2, ER-1.1, ER-1.2, ER-1.3, ER-3.1, ER-3.2, ER-6.6), and prevent or remediate illicit discharges of pollutants to the municipal storm water conveyance system (Policies ER-3.4, ER-3.5, ER-6.6, and PHS-5.5). Compliance with NPDES permits requirements, the Code of the Town of Windsor, and General Plan 2040 goals and policies would reduce the risk of water contamination within the Town from construction and operation of new developments to the maximum extent practicable. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g. the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).

IMPACT HYD-2 CONSTRUCTION AND OCCUPANCY OF NEW STRUCTURES UNDER THE 2040 GENERAL PLAN COULD RESULT IN THE DEPLETION OF GROUNDWATER SUPPLIES OR THE INTERFERENCE WITH GROUNDWATER RECHARGE. IMPLEMENTATION OF THE GOALS AND POLICIES OF THE 2040 GENERAL PLAN WOULD MAXIMIZE THE POTENTIAL FOR INFILTRATION AND ENSURE THE SUSTAINABLE USE OF GROUNDWATER, AND WOULD REDUCE THIS IMPACT TO A LESS-THAN-SIGNIFICANT LEVEL.

Construction activities carried out under the 2040 General Plan could lower the local groundwater level during dewatering activities if it is necessary to remove water from the aquifer table. This potential impact would be temporary, local, and minor. Water supply wells serving the Town would be unaffected by any construction-related dewatering activities. Water use during construction, such as for dust suppression or concrete mixing, would be temporary and minimal and would not substantially lower the groundwater level in the Santa Rosa Plain Subbasin or the Russian River alluvial aquifer.

Development facilitated by the 2040 General Plan could potentially interfere with groundwater recharge through the creation of new impervious surfaces. For new developments and redevelopment projects, the amount of new impervious surfaces would be reduced through Low Impact Development (LID) goals and policies in the 2040 General Plan.

Implementation of the proposed project could potentially increase the demand for water resources. As described in Section 4.15, *Utilities and Service Systems*, the Town's potable water supply has been provided primarily from its wells in the Russian River Well Field, through a Sonoma County Water Agency (SCWA) Russian River water right, and a connection to the SCWA's aqueduct from which the Town purchases wholesale water. Growth in the Town of Windsor that would be facilitated by the 2040 General Plan has been incorporated into the SCWA 2015 Urban Water Management Plan (UWMP) and the Town of Windsor 2015 UWMP. Future water demand in Windsor is projected to be met by the Town's current water supply with the addition of two off-river wells and expansion of the Town's recycled water system (Town of Windsor 2016b). Groundwater extraction from the Russian River alluvial aquifer would be subject to the conditions of the SCWA water rights agreement and future extractions from this aquifer would be managed in accordance with SWRCB regulations. Therefore, projected growth under the 2040 General Plan would not result in a depletion of groundwater supplies in the Santa Rosa Plain Subbasin.

In addition, the 2040 General Plan contains several goals and policies that would encourage groundwater infiltration and promote the use of recycled water and other water conservation efforts. Implementation of the following 2040 General Plan goals and policies would maximize water conservation and reduce the potential for depletion of groundwater resources:

Land Use and Community Design Goals and Policies

Goal LU-9: Interjurisdictional Coordination. Coordinate with the County, LAFCO, and others in the implementation of Windsor's desired land use pattern.

Policy LU-9.6 *Support Regional Solutions*. When consistent with the Town of Windsor General Plan, the Town shall support Sonoma County's efforts to achieve regional solutions to issues related to land use, transportation, climate change, water supply sources, solid waste, and the preservation of open space and natural resources.

Public Facilities and Services Goals and Policies

Goal PFS-2: Water System. Maintain the Town's water system in order to adequately serve existing residents, businesses, and future development.

Policy PFS-2.1 *Water Master Plan*. The Town shall continue to maintain, implement and periodically update the Master Plan to ensure the reliability and efficiency of the Town's water distribution system.

Policy PFS-2.2 *Urban Water Management Plan*. The Town shall maintain the Urban Water Management Plan to adequately estimate projected water demands and supplies over the planning horizon for average and drought year conditions; and shall implement water supply projects to provide for a reliable supply during all water conditions.

Policy PFS-2.3 *Water Supply and Infrastructure*. The Town shall ensure there is adequate water supply and infrastructure in place or that will be available prior to approving any new development.

Policy PFS-2.5 *Recycled Water*. The Town shall continue to support the beneficial reuse of recycled water and the joint use of facilities including reservoir, distribution mains, and pumping facilities for the use of recycled water when such joint use benefits the environment.

Policy PFS-2.6 *Water Conservation Targets*. The Town shall achieve a 20 percent reduction in per-capita water use by 2020 consistent with the State's 20x20x20 Water Conservation Plan.

Policy PFS-2.8 *Conservation Efforts*. The Town shall continue to require the use of water-conserving plumbing fixtures, such as low-flow toilets and showerheads, and water-efficient dishwashers and washing machines in all new development.

Policy PFS-2.9 *Water Efficient Landscaping*. The Town shall require new development to incorporate and implement a whole systems approach to design, construction, installation and maintenance of the landscaping so as to result in water conserving, climate-appropriate landscapes, improved water quality and the minimization of natural resource inputs.

Policy PFS-2.10 *Water Rights*. The Town, through the Windsor Water District shall continue to apply for its own Russian River water right that is currently under the Sonoma County Water Agency's (SCWA) water right with the State of California.

Policy PFS-2.11 *Sustainable Groundwater Management Plan*. The Town and/or Windsor Water District shall participate as a Groundwater Sustainable Agency to develop and implement a plan to meet the requirements of the Sustainable Groundwater Management Act (SGMA).

Policy PFS-2.12 *Water Shortage Contingency Plan*. The Town shall provide a contingency plan to serve as a resource in the case of water supply interruption due to drought or other factors causing water shortage.

Environmental Resources Goals and Policies

Goal ER-3: Water Resources. Protect, manage, and improve natural creek habitats and the quality of the Town's surface water and groundwater resources.

> **Policy ER-3.5** ***Coordination of Water Standards and Management*****.** The Town should actively support Federal and State laws pertaining to the Clean Water Act, Porter-Cologne Water Quality Control Act, and Sustainable Groundwater Management Act in attainment of water quality standards and management of surface water and groundwater.

Public Health and Safety Goals and Policies

Goal PHS-7: Climate Change Adaptation. Improve the sustainability and resiliency of the Town through continued efforts to adapt to climate change and increased drought conditions.

> **Policy PHS-7.6** ***Groundwater Sustainability*****.** The Town shall operate its wells in compliance with the Sustainable Groundwater Management Act.
>
> **Policy PHS-7.7** ***Alternative Groundwater Sources*****.** The Town shall determine and review alternative groundwater sources that can adequately supply the town with water during an ongoing drought.
>
> **Policy PHS-7.8** ***Preserve Groundwater Recharge Areas*****.** The Town shall strive to ensure that important groundwater recharge areas are maintained as open space.
>
> **Policy PHS-7.9** ***Groundwater Recharge Projects*****.** The Town shall encourage the development of groundwater recharge projects of all scales to increase groundwater supplies.
>
> **Policy PHS-7.10** ***Rainwater Harvesting*****.** The Town shall encourage rainwater harvesting design options in new development and retrofitting in existing development.
>
> **Policy PHS-7.11** ***Water Retention During Droughts*****.** The Town shall encourage the use of low impact development (LID) techniques for both public and private sites to aid in groundwater retention and infiltration.

Compliance with 2040 General Plan goals and policies would support regional solutions to water supply challenges (Policy LU-9.6), would ensure an adequate and sustainable water supply for the Town (Policies PFS-2.1, PFS-2.2, PFS-2.3, PFS-2.10, PFS-2.11, PFS-2.12, ER-3.5, PHS-7.6, and PHS-7.7), would promote the efficient use of water resources (Policies PFS-2.5, PFS-2.6, PFS-2.8, PFS-2.9), and would maximize infiltration and rainwater retention (Policies PHS-7.8, PHS-7.9, PHS-7.10, and PHS-7.11). Compliance with Sustainable Groundwater Management Act requirements, implementation of the SCWA and Town of Windsor UWMPs, and adherence to the General Plan 2040 goals and policies would maximize groundwater infiltration and increase water use efficiency within the Town associated with construction and operation of new developments to the maximum extent practicable. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site.

IMPACT HYD-3 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN COULD ALTER THE EXISTING DRAINAGE PATTERNS IN THE TOWN AND POTENTIALLY RESULT IN EROSION AND SILTATION. COMPLIANCE WITH APPLICABLE REGULATIONS, INCLUDING THE CLEAN WATER ACT, AND IMPLEMENTATION OF THE GOALS AND POLICIES OF THE 2040 GENERAL PLAN WOULD MINIMIZE THE POTENTIAL FOR EROSION AND SILTATION AND WOULD REDUCE THIS POTENTIAL IMPACT TO A LESS-THAN-SIGNIFICANT LEVEL.

Windsor's topography is relatively flat, with a gentle slope to the southwest. The majority of soil groups in the Town have a moderate to low susceptibility erosion. Thus, the potential for soil erosion over a large part of the Town is low. Along the eastern edge of the Town where the slopes are more severe within the foothills, the potential for soil erosion increases. Soils with smaller grain size and lower cohesion, such as sandy silt, have moderate erosion potential. The Felta, very gravelly loam soil group in the northeastern portion of the Town is highly susceptible to erosion, mainly due to its location on steep slopes. Development under the 2040 General Plan would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water.

Development facilitated by the 2040 General Plan would result in alterations to drainage patterns through structural changes to ground surface permeability and changes in topography from grading and excavation. As described under Impact HYD-1, construction of future developments could result in soil erosion due to earth-moving activities such as excavation and trenching for foundations and utilities, soil compaction and moving, cut and fill activities, and grading. If not managed properly, disturbed soils would be susceptible to high rates of erosion from wind and rain, resulting in sediment transport and siltation of local streams via storm water runoff from the construction sites.

Construction activities that disturb one or more acres of land surface are subject to the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) adopted by the State Water Resources Control Board (SWRCB). Compliance with the permit requires each qualifying development project to file a Notice of Intent with the SWRCB. Permit conditions require development of a storm water pollution prevention plan (SWPPP), which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-storm water management controls. Inspection of construction sites before and after storms is also required to identify storm water discharge from the construction activity and to identify and implement erosion controls, where necessary. Compliance with the Construction General Permit is reinforced through the Code of the Town of Windsor, which requires the development of an erosion and sediment control plan that is equivalent to the required SWPPP.

The Code of the Town of Windsor also requires an erosion and sediment control plan for construction sites that disturb less than one acre. The erosion and sediment control plan must contain BMPs to reduce or prevent erosion, such as vegetation preservation, silt fencing, fiber rolls, sand bag barriers, gravel bag berms, and stockpile management. Grading on slopes greater than 10 percent is prohibited between October 1 and April 30, unless an exemption is granted. Adherence to the requirements of the Code of the Town of Windsor would reduce the potential for new

construction under the 2040 General Plan to cause erosion or siltation by ensuring proper management of loose and disturbed soil.

In addition to compliance with mandatory Clean Water Act and Code of the Town of Windsor requirements, implementation of 2040 General Plan goals and policies would further reduce the potential for erosion and off-site siltation from construction-related soil disturbance. Implementation of the following 2040 General Plan goals and policies would help to ensure proper soil management, maintain appropriate development setbacks from creeks, and would minimize the potential for erosion and siltation:

Public Facilities and Services Goals and Policies

Goal PFS-4: Storm Water Drainage. Improve the Town's storm water drainage system to reduce excess runoff, reduce impacts to water quality, and protect environmentally sensitive areas.

> **Policy PFS-4.5** ***Construction Activities and Grading Effects on Water Quality*****.** The Town shall develop and implement policies that support erosion control and reduce water quality impacts resulting from grading and construction activities.

Environmental Resources Goals and Policies

Goal ER-3: Water Resources. Protect, manage, and improve natural creek habitats and the quality of the Town's surface water and groundwater resources.

> **Policy ER-3.2** ***Development Along Creeks*****.** The Town shall protect, preserve, and improve creeks by requiring that development activities along creeks be conducted using Low Impact Development (LID) principles, appropriate creek setbacks, and Best Management Practices that seek to minimize the discharge of sediments and urban pollutants into the waterways and that are consistent with the NPDES permit.

Goal ER-6: Biological Resources. Protect unique and sensitive biotic features such as rare and endangered plant and animal species, dense oak woodlands, and vernal pools, and encourage sensitive design in these areas.

> **Policy ER-6.6** ***Prohibition of Certain Activities in Riparian Habitats*****.** The Town shall prohibit dumping or disposal of refuse; confinement of livestock; and structural improvements except necessary water supply projects, flood control projects, fish and wildlife enhancement projects, trail projects, road and bridge projects, and utility projects in significant riparian areas.

Public Health and Safety Goals and Policies

Goal PHS-2: Seismic and Geologic Hazards. Minimize the risk to lives and property due to geologic and seismic hazards.

> **Policy PHS-2.2** ***Development on Steep Slopes*****.** The Town shall discourage development in areas with slopes of 20 percent or greater to reduce the potential impacts of erosion and slope instability. New development proposed on slopes of 20 percent or greater shall provide an assessment of the site slope stability, susceptibility to landslide, and erodibility prepared by a certified engineering geologist. The Town shall require mitigation measures as necessary based on the site assessment.

Implementation of these goals and policies would ensure that the Town continues to develop policies that support erosion control (Policy PFS-4.5) and that new development on steep slopes and near streams is properly designed and constructed to minimize erosion (Policies ER-3.2, ER-6.6, and PHS-2.2). Implementation of these goals and policies, in addition to compliance with applicable laws and regulations, would minimize the potential for erosion and siltation and would reduce this potential impact to a less-than-significant level.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site; or, create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

IMPACT HYD-4 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN COULD ALTER THE EXISTING DRAINAGE PATTERNS AND INCREASE THE AMOUNT OF RUNOFF THROUGHOUT THE TOWN, WHICH COULD RESULT IN FLOODING ON- OR OFF-SITE, EXCEED THE CAPACITY OF EXISTING OR PLANNED STORM WATER DRAINAGE SYSTEMS, OR CREATE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF. COMPLIANCE WITH APPLICABLE REGULATIONS AND IMPLEMENTATION OF THE GOALS AND POLICIES OF THE 2040 GENERAL PLAN WOULD MINIMIZE THE POTENTIAL FOR INCREASED RUNOFF AND FLOODING AND WOULD REDUCE THIS POTENTIAL IMPACT TO A LESS-THAN-SIGNIFICANT LEVEL.

Development facilitated by the 2040 General Plan would be within the Urban Growth Boundary and would encourage infill development and discourage development in open space areas. New development or redevelopment that would be facilitated by the 2040 General Plan could incrementally increase the total impervious area within Windsor and increase storm water runoff. However, as described above, implementation of 2040 General Plan goals and policies and adherence to the requirements of the Code of the Town of Windsor would maximize the on-site infiltration capacity for new development and redevelopment projects and would minimize the off-site runoff that would leave those project sites.

In accordance with Section Title IX, Chapter 1 of the Code of the Town of Windsor, new development that would occur within flood-related erosion-prone areas known to the community shall be reviewed to determine whether the proposed site alterations and improvements would be reasonably safe from flood-related erosion and would not cause flood-related erosion hazards or otherwise aggravate the existing hazard. If a proposed development would be in the path of flood-related erosion or would increase the erosion hazard, the development shall be relocated or adequate protective measures shall be taken to avoid aggravating the existing erosion hazard. Potential impacts related to polluted runoff would be less than significant.

Storm water drainage facilities in the Town discharge storm water to the local streams, which then drain eventually to the Russian River and the Pacific Ocean. The existing storm water drainage system is sufficient to drain runoff within the Town under all but the most severe flooding

conditions. Implementation of the following 2040 General Plan goals and policies would ensure that the Town's storm water drainage facilities remain adequate following anticipated future development:

Public Facilities and Services Goals and Policies

Goal PFS-4: Storm Water Drainage. Improve the Town's storm water drainage system to reduce excess runoff, reduce impacts to water quality, and protect environmentally sensitive areas.

> **Policy PFS-4.1 *Storm Water Management Plan*.** The Town shall maintain and implement a Storm water Management Plan, which is designed to protect water quality through implementation of best management practices for storm water runoff from development.
>
> **Policy PFS-4.2 *Flood Control*.** The Town shall develop and implement a Storm Drain Master Plan for the storm drainage system network that provides for sufficient capacity for storm water runoff from existing and future development and addresses flooding in low-lying areas.

Implementation of these goals and policies would ensure that the Town maintains and implements an effective storm water management plan (Policy PFS-4.1) and that the storm water drainage system provides adequate storm water drainage for both existing and new development (Policy PFS-4.2). Implementation of these goals and policies, in addition to compliance with applicable laws and regulations, would minimize the potential for increased runoff and flooding and would reduce this potential impact to a less-than-significant level.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Place housing 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; place within a 100-year flood hazard area structures which would impede or redirect flood flows; or, expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.

IMPACT HYD-5 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN COULD PLACE HOUSING OR STRUCTURES IN A FLOOD HAZARD AREA AND EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH INVOLVING FLOODING. COMPLIANCE WITH APPLICABLE REGULATIONS AND IMPLEMENTATION OF THE GOALS AND POLICIES OF THE 2040 GENERAL PLAN WOULD PROTECT STRUCTURES FROM ADVERSE EFFECTS RELATED TO FLOODING, WOULD MINIMIZE THE EXPOSURE OF PEOPLE OR STRUCTURES TO FLOODING, AND WOULD REDUCE THIS POTENTIAL IMPACT TO A LESS-THAN-SIGNIFICANT LEVEL.

Flooding from a 500-year storm would affect a few small areas in the southeastern and central parts of the Town. Several relatively small areas associated with the main streams that cross the Town are subject to flooding from a 100-year storm and are designated as Special Flood Hazard Areas (FEMA 2017). These Special Flood Hazard Areas run north to south through the central portion of the Town and east to west through the southern portion of the Town (FEMA 2017). The largest Special Flood

Hazard Areas are located in the southern portion of town and are associated with Pool Creek and Pruitt Creek (FEMA 2017).

As described above under Impact HYD-4, the Town's storm water conveyance system is currently adequate to drain runoff away from structures and improvements to the storm water drainage system would occur concurrently with new development under the 2040 General Plan such that the drainage system remains adequate.

Although several 100-year flood hazard areas exist within the Town, future development within these areas would be subject to the requirement of the Code of the Town of Windsor. Title IX, Chapter 1 of the Municipal Code contains several requirements and restrictions related to floodplain development. All new construction within a 100-year flood hazard area shall be adequately anchored to prevent flotation, collapse, or lateral movement of the structure, shall have the lowest floor elevated above the base flood elevation, shall be constructed with flood resistant materials, shall have electrical, heating, ventilation, plumbing and air conditioning equipment that are designed and/or located so as to prevent water from entering or accumulating within the components, and shall have adequate drainage paths around structures to guide flood waters around and away from proposed structures. No new construction shall be permitted within a regulatory floodway unless it is certified by a registered civil engineer that the proposed encroachment would not result in any increase in flood levels during the occurrence of the base flood discharge.

As described above under the heading *Dam Inundation*, the Town of Windsor is within the dam failure inundation area for several dams, the largest of which is the Warm Springs Dam. Failure of any one of these dams would result in flooding of parts of the Town. Failure of the Warm Springs Dam would result in flooding of approximately the western half of the Town. Development under the 2040 General Plan would not increase the risk of inundation following dam failure compared to existing conditions. Compliance with the California Building Code would ensure that new development or redevelopment projects would incorporate adequate flood protection measures, such as drainage facilities, protective walls, suitable fills, or elevated floors.

In addition to compliance with mandatory California Building Code and Code of the Town of Windsor requirements, implementation of 2040 General Plan goals and policies would further reduce the risk of loss, injury, or death from flooding. Implementation of the following 2040 General Plan goals and policies would help to ensure proper flood zone protection and management, and would minimize the risk of loss, injury, or death from flooding:

Public Health and Safety Goals and Policies

Goal PHS-3: Flood Hazards. Minimize the risks to lives and properties due to flood hazards.

> **Policy PHS-3.1** ***100-Year Flood Zone Protection*****.** The Town shall require that new residential, public, commercial, and industrial development be required to implement protection measures when located in a 100-year flood zone.
>
> **Policy PHS-3.2** ***Land Use Restriction in Flood Prone Areas*****.** The Town shall continue to prohibit development in designated regulatory floodways (Figure PHS-3). Development is permitted in the floodway fringe with the approval of a development permit and appropriate mitigation measures.
>
> **Policy PHS-3.3** ***Prohibition of Emergency Facilities in Floodplain*****.** The Town shall prohibit facilities essential for emergencies and facilities for large public assembly from developing in a

100-year flood zone, unless the structure and access to the structure are sited and/or designed in a way to keep them free from flood inundation.

Policy PHS-3.4 *Floodplain Management*. The Town shall support floodplain management over flood control structures for preventing damage from flooding except where the intensity of development requires a high level of protection and justifies the costs of structural measures. Where flood control structures are necessary, the Town shall require appropriate mitigation for loss of riparian vegetation and habitat.

Policy PHS-3.5 *Floodplain Combining District*. The Town shall continue to use the floodplain combining district of its Zoning Ordinance to specify the appropriate development regulations and to define the development review process for proposals within the floodways and within the 100-year flood zone in order to remain consistent with Muni Code Title 9: Flood Damage, Flood Control, and Drainage.

Policy PHS-3.6 *Appropriate Development in the Flood Hazard Areas*. The Town shall use the FEMA Flood Insurance Rate maps as the defining minimum acceptable level of risk. Structural development within a Special Flood Hazard Area (SFHA) would only be permitted if the property owner/developer demonstrated with substantial evidence that the areas proposed for buildings do not encroach into the floodplain, that there are no practicable alternatives, and that effective mitigation measures have been incorporated to minimize potential public safety risks and to not increase the size of the SFHA.

Policy PHS-3.7 *Developer Improvement Costs*. The Town shall require property owners/developers who benefit from the installation of drainage facilities that handle storm water runoff from new development to install and/or pay their fair share cost of these improvements and maintenance of such improvements as the Town deems appropriate.

Policy PHS-3.8 *Dam Failure*. The Town shall continue to coordinate with the County to maintain current Dam Inundation Maps and Dam Failure Plans.

Implementation of these goals and policies would ensure that the Town carefully manages development within a floodplain (Policy PHS-3.2, PHS-3.3, PHS-3.4, PHS-3.5, and PHS-3.6) and that any development within a floodplain is properly constructed to withstand adverse effects related to flooding (Policies PHS-3.1 and PHS-3.5). Implementation of these goals and policies, in addition to compliance with applicable laws and regulations, would minimize the potential for loss, injury, or death from flooding and would reduce this potential impact to a less-than-significant level.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Expose people or structures to significant risk or loss, injury or death involving inundation by seiche, tsunami, or mudflow.

IMPACT HYD-6 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN COULD EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY, OR DEATH INVOLVING MUDFLOW. COMPLIANCE WITH APPLICABLE REGULATIONS AND IMPLEMENTATION OF THE GOALS AND POLICIES OF THE 2040 GENERAL PLAN WOULD MINIMIZE THE POTENTIAL FOR ADVERSE EFFECTS RELATED TO MUDFLOW AND WOULD REDUCE THIS POTENTIAL IMPACT TO A LESS-THAN-SIGNIFICANT LEVEL.

Windsor is not located within a tsunami inundation area and therefore development carried out under the 2040 General Plan would not be subject to inundation by tsunami (CalEMA 2009). There are several small ponds and reservoirs within the Windsor, including small reservoirs in Foothill Regional Park and water treatment ponds in the southwest portion of the Town. However, none of these reservoirs or ponds is of sufficient size to result in substantial damage by seiche during a seismic event. The majority of Windsor is relatively flat and urbanized. Mudflow could occur following a rainstorm within and near the foothills in the northeastern portion of the Town. Development projects in this area could be inundated by mudflow following a rainstorm. However, compliance with existing laws and regulations including the California Building Code would reduce the potential for loss, injury, or death from mudflow by requiring that foundations and structures are built to withstand geotechnical hazards such as landslide and mudflow.

In addition to compliance with mandatory California Building Code requirements, implementation of 2040 General Plan goals and policies would further reduce the risk of loss, injury, or death from mudflow. Implementation of the following 2040 General Plan goals and policies would help to ensure proper siting and construction of new development in areas subject to mudflow, and would minimize the risk of loss, injury, or death from flooding:

Environmental Resources Goals and Policies

Goal ER-1: Open Space. Preserve open space land for the continuation of commercial agricultural and productive uses, the protection and use of natural resources, the enjoyment of scenic beauty and recreation, and the protection from natural hazards.

> **Policy ER-1.3** ***Reducing Development in Significant Threat Areas*****.** The Town shall ensure that areas that pose significant threats to public health and safety, such as steep slopes, regulatory floodways, and the Alquist-Priolo Special Study Zone, are pre-dominantly maintained as open space.

Public Health and Safety Goals and Policies

Goal PHS-2: Seismic and Geologic Hazards. Minimize the risk to lives and property due to geologic and seismic hazards.

> **Policy PHS-2.1** ***Maintain Open Space in Hazardous Areas*****.** The Town shall encourage the County to maintain the existing low intensity, rural land use designations and zoning in the following areas to limit exposure of people and structures to hazards:
>
> a. The northeastern portion of the Planning Area, and to the west in the transition area from the Santa Rosa Plain to the Russian River floodplain, where there is moderate or high potential for landslides.
>
> b. The Alquist-Priolo Special Study Zone established for the Healdsburg-Rodgers Creek fault, where there is potential for ground rupture.

Policy PHS-2.2 ***Development on Steep Slopes*****.** The Town shall discourage development in areas with slopes of 20 percent or greater to reduce the potential impacts of erosion and slope instability. New development proposed on slopes of 20 percent or greater shall provide an assessment of the site slope stability, susceptibility to landslide, and erodibility prepared by a certified engineering geologist. The Town shall require mitigation measures as necessary based on the site assessment.

Policy PHS-2.3 ***Development Review for Hazards*****.** The Town shall consider the potential danger to health, safety, and welfare of Windsor residents and businesses in its review of development applications and seek to have hazardous conditions mitigated to an acceptable level. When development is proposed in or near a known hazard area, a technical analysis (e.g., geotechnical report, flood analysis, structural engineering report) shall be completed.

Policy PHS-2.4 ***Building Code Compliance*****.** The Town shall continue to comply with the prevailing version of the California Code of Regulation.

Implementation of these goals and policies would ensure that new development on steep slopes is properly designed in accordance with California Building Code requirements and is constructed to minimize exposure to loss, injury, or death from mudflow. Implementation of these goals and policies, in addition to compliance with applicable laws and regulations, would minimize the potential for loss, injury, or death from mudflow and would reduce this potential impact to a less-than-significant level.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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4.10 Land Use and Planning

This section summarizes the Town's land use characteristics, including the overall land use pattern as well as a more detailed analysis by major land use type, and analyzes existing plans and focus areas with development potential in order to determine the potential environmental effects of the proposed 2040 General Plan related to Land Use and Planning. The area of analysis is the General Plan Area, which includes the area in the Town Limits and revised Urban Growth Boundary (UGB). The UGB defines the extent of the town's future urbanization with the intention of promoting orderly and efficient development within the town. The Sphere of Influence, established by the Local Agency Formation Commission, is largely consistent with the UGB. As stated in the Town's land use policies, the Sphere of Influence proposed by the Town should be contiguous with the Urban Growth Boundary with few exceptions (See proposed 2040 General Plan Land Use Policies, LU-7.5 and LU-7.6).

4.10.1 Setting

Current Land Use Pattern

Figure 3 in Section 2, *Project Description*, shows the Land Use Map from the Town's current 1996 General Plan. The general distribution of land uses within the Town is shown in Table 19. The most common existing land use category within the Urban Growth Boundary and Town Limits is single family residential. Single family residential uses make up 29 percent of the existing Urban Growth Boundary (1,405 acres) and 31 percent of the Town Limits (1,399 acres). Outside of the corridor between the railroad and Highway 101, most of the Town Limits is currently single family residential.

Commercial and office uses make up roughly 4 percent of the Urban Growth Boundary (183 acres) and 4 percent of the Town Limits (179 acres). Industrial lands in Windsor are primarily located in the southern part of the Urban Growth Boundary and Town Limits between Shiloh Road to the north and Airport Boulevard to the south. Industrial uses make up 6 percent of the Urban Growth Boundary (307 acres) and 7 percent of the Town Limits (307 acres).

Vacant or underutilized land makes up 9 percent of the Urban Growth Boundary and 8 percent of the Town Limits. Agricultural uses make up 6.2 percent of the Urban Growth Boundary and 1.6 percent of the Town Limits.

Table 19 Existing Land Use Summary

	Urban Growth Boundary		Town Limits	
Land Use Type	**Acres**	**Percent of Total**	**Acres**	**Percent of Total**
Agriculture	298	6.2	71	1.6
Commercial Retail	73	1.5	73	1.6
Commercial Services	79	1.6	77	1.7
Industrial	307	6.4	307	6.7
Mixed-use	1	<0.1	1	<0.1
Multifamily Residential	153	3.2	153	3.4
Multiple Use	4	0.1	4	0.1
Office	29	0.6	29	0.6
Open Space	55	1.1	55	1.2
Other/Right-of-Way	850	17.6	806	17.7
Parks and Recreation	292	6.1	291	6.4
Public/Quasi Public	482	10.0	732	16.1
Rural Residential	367	7.6	198	4.3
Single Family Residential	1,405	29.2	1,399	30.7
Vacant/Underutilized	422	8.8	362	7.9
Total	**4,816.5**	**100.0**	**4,557.4**	**100.0**

Source: Sonoma County Assessor's Office, Town of Windsor, 2014 from the Town of Windsor General Plan Update Background Report, Land Use, 2015

Existing Plans and Studies

1996 Town of Windsor General Plan

The current Town of Windsor General Plan was adopted in March 1996 and amended in October 2015. The Town of Windsor only designates lands for uses within its Urban Growth Boundary. Lands outside the Urban Growth Boundary are designated by the County of Sonoma through the County General Plan. Some of the key goals and objectives related to land use are summarized below.

1996 Town of Windsor General Plan Land Use Goals

Community Design

- Create a Town identity
- Encourage neighborhoods and districts which foster and promote a friendly, family-oriented community, and support an active, diverse, and involved citizenry
- Preserve the Town's aesthetic quality and small town atmosphere and improve its overall physical image

Community Development Pattern

- Provide for orderly development within the Windsor Planning Area that creates an urban development pattern within the Town and a rural, undeveloped pattern in the Planning Area's periphery

Economic Development

- Provide an open and inviting business climate for new and existing businesses, a balanced economic environment, and diverse tax base

Transportation

- Provide an efficient circulation system to accommodate the movement of people and goods including rail, vehicular, transit, pedestrian, and cyclist movement

Community Services and Facilities

- Provide adequate public services and facilities concurrent with development

2008 Sonoma County General Plan

The Sonoma County General Plan was adopted in September 2008 with 13 amendments adopted thereafter. The latest amendment was to the Land Use Element and it was adopted on August 2, 2016. The Sonoma County General Plan has several land use designations partially within the Urban Growth Boundary, but outside of the Town limits. These land designations include primarily Land Intensive Agriculture, Diverse Agriculture, Resources and Rural Development, and Rural Residential, but also includes limited Public/Quasi Public, Limited Industrial, Urban Residential, General Commercial, and Limited Commercial.

2008 County General Plan Land Use Goals

1. Growth projections and growth policy
2. City and community centered growth
3. Compact city and community boundaries
4. Phasing of rural and urban growth with availability of adequate services
5. Open space separation between and around cities/communities
6. Opportunities for diverse rural and urban residential environments
7. Use of environmental suitability criteria to locate and guide urban and rural growth
8. Protection of water resources
9. Protection of agricultural lands
10. Preservation of scenic features and biotic resource areas
11. Sustainability (Sonoma County 2008)

Sonoma County Comprehensive Airport Land Use Plan

The Sonoma County ALUC adopted the County's Comprehensive Airport Land Use Plan (CALUP) in January 2001, and revised in March 2016. The CALUP is the ALUC's official land use policy document within the airport influence areas for all six public use airports in the County. Charles M. Schultz-Sonoma County Airport is located over 870 feet southwest of the Windsor Town Limits and Urban Growth Boundary (Sonoma County Airport Land Use Commission 2016).

2012 Windsor Station Area/Downtown Specific Plan

The Town of Windsor adopted the Station Area/Downtown Specific Plan in 2012 with amendments in 2013. The Specific Plan supersedes the Town of Windsor 1997 Downtown Plan. The Plan Area encompasses approximately 390 acres and includes the railway station, the Downtown core, and surroundings; two large approved and pending development projects (Bell Village and Windsor

Mill); several opportunity sites; and community destinations including Windsor High School, Keiser Park, the Town Green, Windsor Creek Elementary School, and the Civic Center.

The majority of the Plan Area is designated by the Association of Bay Area Governments (ABAG) as a Priority Development Area (PDA). This program encourages smart growth principles along routes of regional significance. The Specific Plan seeks to advance the Metropolitan Transportation Commission Transportation-Oriented Development Policy, which has a goal of reaching an average of 2,200 units within a half-mile of commuter rail stations, as well as evolve the Windsor Priority Development Area (PDA) from a Suburban Center to a Transit Town Center.

The Specific Plan provides a vision for a mixed-use, pedestrian-scaled, transit-oriented district, centered on the Town Green with links to the town and region. It provides an overall vision for the area, goals and policies for each topic, development standards/zoning regulations, and design guidelines for development. It also includes implementation programs with timelines and responsibilities.

2012 Station Area/Downtown Specific Plan Goals

1. Establish a land use plan and policy framework to guide future development and redevelopment toward land uses that support transit ridership
2. Improve motorized, non-motorized, and transit connectivity between the Station and existing adjacent commercial and residential areas
3. Develop urban design standards and implementation strategies that promote walkable and livable environments
4. Prepare a comprehensive environmental document (Programmatic EIR) to facilitate subsequent environmental reviews of changes to existing policy/regulatory documents, capital improvement projects, and private development proposals
5. Work collaboratively with the community in establishing a vision for the area, and to educate and inform the public about the specific plan process and transit-oriented development (TOD) concepts (Town of Windsor 2012)

2017 Windsor Civic Center Visioning Plan

The Windsor Civic Center Visioning Plan was adopted on February 1, 2017 and provides an in-depth analysis of potential future uses of the Civic Center and surrounding areas. The document provides details about the form, mix, and quality of public and privately developed uses to achieve a Civic Center that reflects community values. Recommendations in the document include ways to improve the retail environment around the Town Green and new retail proposed for the north edge of the Town Green. Finally, the document recommends parking management that would work to provide balanced multi-modal transportation and vehicle parking (Town of Windsor 2017c).

2002 Shiloh Road Village Vision Plan

The Town of Windsor approved the Shiloh Road Village Vision Plan in 2002. In 2005, the Town Council adopted General Plan and Zoning Code amendments that implement the Vision Plan. The Plan area includes 80 acres located along Shiloh Road between Highway 101 and Old Redwood Highway. The Plan calls for relatively high-intensity mixed-use development following “New Urbanist” design principles. The Plan includes a variety of housing types at densities of up to 32 units per acre within a number of pedestrian-oriented neighborhoods. The Vision Plan is intended to

yield a high quality aesthetic environment that benefits property owners, merchants, residents, and visitors alike. Goals from the 2002 Shiloh Road Village Plan are shown below.

1. Shiloh Road Village Vision Plan Guiding Principles
2. Unique village design that does not compete with Downtown
3. Housing diversity
4. Mixed-uses (housing and commercial) along Shiloh Road
5. Lower density housing shall be placed along the fringes of the project area
6. Safe movement of traffic
7. Secondary circulation system
8. Open space and native, low water use landscaping
9. No residential use shall face parking lots
10. Whenever possible, residential uses face residential uses (Town of Windsor 2004)

2010 Old Redwood Highway Streetscape Design Guidelines

The Old Redwood Highway Streetscape Design Guidelines were adopted in 2010 to guide the design of future development along Old Redwood Highway. The circulation design objective for the Design Guidelines is to calm traffic, accommodate safe bicycle routes, and create pedestrian-friendly linkages and activity areas. The Plan strives to define Old Redwood Highway as an integral component of the downtown; physically connected to, and visually consistent with the character of the Town Green District. Complete Street traffic management solutions have been developed with all users in mind and includes; for example, roundabouts, reverse-angle parking, generous sidewalk widths, corner bulb-outs, crosswalk refuge medians, bus stop turnouts, shelters, color-defined bike lanes, and bike land escape paths. The Guidelines are to be incorporated into future private and public development projects along a segment of the Old Redwood Highway between its intersections with Windsor River Road and Windsor Road (Windsor 2010).

Connecting Windsor Bicycle and Pedestrian Study

The Connecting Windsor study explores ways to improve bicycle and pedestrian connectivity between the east and west sides of Windsor near the downtown area. The study also examines options for expanding the existing bicycle and pedestrian network in the downtown area, and methods for improving the existing Old Redwood Highway underpass to make it more inviting and able to accommodate a greater number of pedestrians and cyclists. In the fall of 2016, the Town expanded the scope of the study to include a traffic analysis of Old Redwood Highway and a biological assessment of the Windsor Creak area. The study is still in the planning phase and the project team has met with the public and interested stakeholders to solicit input on the project (Town of Windsor 2017d).

Proposed Town of Windsor 2040 General Plan

The 2040 General Plan, the proposed project under analysis in this EIR, would update and supersede the 1996 General Plan. It contains a description of 18 different land use designations proposed for the Town of Windsor. The descriptions include density and intensity standards to regulate development within each land use designation. A principal philosophy of the General Plan is the prioritization of infill development over development at the fringe. This approach helps create more efficient and cost-effective infrastructure, maximizes the use of underutilized parcels within the Town, and minimizes the loss of open space.

Focus Areas

The 2040 General Plan includes growth management strategies to preserve open space lands and prioritize infill development. The Town's goals and policies seek to ensure neighborhoods are designed to be compact, promote visual interest, and avoid the isolated residential enclaves, or walled subdivisions. Designated focus areas within the Town, such as Urban Growth Boundary and community places help ensure the Town's goals and policies are achieved.

Urban Growth Boundary

The Urban Growth Boundary, approved by voters in 1998, is based on a number of factors intended to promote orderly and efficient development within the town. These factors include natural features, such as creeks and hills, Sonoma County's community separators, availability of utilities, proximity to existing urban uses, property lines, and the productivity of farmlands. The original 1996 General Plan directed the Town to adopt and maintain an Urban Growth Boundary (UGB) defining the extent of the town's future urbanization. In January 1998 Windsor voters approved Measure A, which established in the General Plan a 20-year UGB. The voter-approved UGB expires at the end of 2017; however, this General Plan provides support for the continuation of the UGB as a tool for managing growth in Windsor. Concurrent with the General Plan Update, the Town of Windsor is proposing that the Town's UGB be renewed for 22 years to coincide with the horizon year of the General Plan Update. The Town is also proposing that the UGB be expanded to include an additional 22.5 acres of land in the southeast edge of town, representing less than one-half of one percent of the total land area within the current Town of Windsor. Renewal and expansion of the UGB requires approval of a ballot measure by voters. The Town Council has scheduled a special election for November 7, 2017 to extend the UGB for another 22 years.

Proposed 2040 General Plan Land Use Goals

Goal LU-1: Community Design. Encourage well-designed development that preserves and enhances Windsor's community character.

Goal LU-2: Residential Development. Promote the preservation and development of residential neighborhoods that provide a variety of housing types, densities, and designs that address the diverse needs of Windsor residents of all ages and socio-economic groups.

Goal LU-3: Commercial Development. Promote attractive and vibrant neighborhood, community, and regional commercial centers that provide convenient and enhances opportunities for shopping, services, entertainment, and social interaction.

Goal LU-4: Mixed-Use Development. Create well-defined nodes of activity containing an integrated mix of commercial, office, and residential uses that enable Windsor residents to live close to businesses and services, reduce automobile use, and actively encourage pedestrian activity.

Goal LU-5: Industrial Development. Encourage a robust industrial base that provides jobs for local residents, increases the tax base, and is designed and operated in a way that is compatible with surrounding uses.

Goal LU-6: General Location and Pattern of Growth. Encourage an orderly, contiguous pattern of development that prioritizes infill development, preserves resources, enhances livability, strengthens the local economy, and furthers Windsor's small town feel.

Goal LU-7: Urban Growth Boundary: Establish an Urban Growth Boundary with sufficient land to accommodate the Town's growth for the next 20 years.

Goal LU-8: Growth Control Ordinance: Allow Windsor to grow at a reasonable pace, given infrastructure capacity and the desire to maintain its small town feel, healthy economy, and healthy community, and achieve greenhouse gas emission reduction goals.

Goal LU-9: Interjurisdictional Coordination: Coordinate with the County, LAFCO, and others in the implementation of Windsor's desired land use pattern.

Regulatory Setting

State

General Plan Law (California Government Code Section 65300)

California Government Code Section 65300 regulates the substantive and topical requirements of general plans. State law requires each city and county to adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning." The California Supreme Court has called the general plan the "constitution for future development." The general plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private.

California Government Code Section 65301

Section 65301 of the California Government Code requires a general plan to address the geographic territory of the local jurisdiction and any other territory outside its boundaries that bears relation to the planning of the jurisdiction. The jurisdiction may exercise their own judgment in determining what areas outside of its boundaries to include in the Planning Area. The State of California General Plan Guidelines state that the Planning Area for a city should include (at minimum) all land within the city limits and all land within the city's Sphere of Influence.

California Government Code Section 65860

In counties, general law cities, and charter cities with a population of more than two million, zoning provisions must be consistent with the general plan. Charter cities with a population of under two million are exempt from the zoning consistency requirement unless their charters provide otherwise. The Town of Windsor is a general law city and is, therefore, required to have zoning consistency with its General Plan.

Cortese Knox Hertzberg Local Government Reorganization Act of 2000 (CKH Act)

The Cortese Knox Hertzberg Local Government Reorganization Act (CKH Act) is the most significant reform to local government reorganization law since the 1963 statute that created a LAFCO in each county. The law established procedures for local agency changes of organization, including city incorporation, annexation to a city or special district, and consolidation of cities or special districts (Section 56000, et seq.). LAFCOs have numerous powers under the CKH Act, but the most important are the power to act on local agency boundary changes and to adopt spheres of influence for local agencies. The law also states that in order to update a Sphere of Influence, LAFCOs are required to first conduct a review of the municipal services provided by the local agency. The CKH Act also

requires LAFCOs to update spheres of influence for every city and special district every five years. The original deadline was January 2006, five years following the CHK Act becoming State law. That deadline was extended two years to January 2008. Every SOI update must be accompanied by an update of the municipal services review (MSR). Sonoma County LAFCO completed a municipal service review for Windsor in 2006. Sonoma County LAFCO's policy is to confirm Spheres of Influence every five years and to complete an MSR when sphere amendments are proposed. The next municipal service review for Windsor will occur whenever an amendment is considered.

Regional

ABAG/MTC Plan Bay Area 2040, adopted in July 2017*,* is a long-range, integrated transportation and land-use plan for the nine-county San Francisco Bay Area. The Plan's combined Sustainable Communities Strategy and Regional Transportation Plan (also referred to as the RTP/SCS) was jointly adopted by the ABAG and the Metropolitan Transportation Commission (MTC) in July 2017. The Plan describes where and how the region can accommodate the projected 820,000 new households and 1.3 million new jobs between 2017 and 2040 and details the regional transportation investment strategy over the next 24 years. Growth in the plan area is promoted in PDAs and limited in Priority Conservation Areas (PCAs) to promote preservation of key resources. The Plan contains seven goals to address major challenges in the region and has established 13 performance targets to assess the Plan's effectiveness in meeting its goals. ABAG and MTC developed land use and transportation scenarios in the Plan that distribute the total amount of anticipated growth across the region and measure how well each scenario measures against the Plan goals. Based upon performance, the preferred scenario provides a regional pattern of household and employment growth and a corresponding transportation investment strategy (ABAG/MTC 2017).

Local

Zoning

Zoning is the instrument that implements the land use designations of the General Plan. In addition to establishing permitted uses, zoning may also establish development standards relating to issues such as intensity, setbacks, height, and parking. Projects submitted to the Town for review and approval are generally evaluated for consistency with the zoning designations.

Zoning Districts

The Town of Windsor's Zoning Ordinance carries out the policies of the Windsor General Plan by classifying and regulating the uses of land and structures within the Town, consistent with the General Plan. The Zoning Code describes various types of zoning districts and land use classifications, land use regulations, development standards, and environmental performance standards. The Zoning Ordinance applies to all land uses, subdivisions, and development within the Town of Windsor. The purpose of the Zoning Ordinance is to protect and to promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents, and businesses in the Town. More specifically, the purposes of this Zoning Ordinance are to:

A. Provide standards and guidelines for the orderly growth and development of the Town that will assist in protecting the rural characteristics and community identity of Windsor;

B. Conserve and protect the Town's natural beauty and setting, including the rolling hills and oak trees, scenic vistas, and historic and environmental resources;

C. Create a comprehensive and stable pattern of land uses upon which to plan transportation, water supply, sewerage and other public facilities and utilities;

D. Minimize automobile congestion by promoting pedestrian oriented development, safe and effective traffic circulation, and adequate off-street parking facilities; and

E. Ensure compatibility between residential and commercial development and land uses.

The Town is divided into 22 zoning districts that fall under five general categories, as follows:

- Overlay District
  - AS -Airport Safety
  - F - Flood Hazard
  - OH – Historic Overlay
- Special Purpose Districts
  - OS - Open Space
  - PD - Planned Development
  - PI - Public/Institutional
  - REC - Recreation
- Residential Districts
  - CR - Compact Residential
  - ER - Estate Residential
  - SR – Surrounding Residential
  - VR – Village Residential
  - MDR – Medium Density Residential
  - HDR – High Density Residential
- Commercial Districts
  - BC – Boulevard Commercial
  - RC – Regional Mixed-use
  - NC – Neighborhood Center Commercial
  - CC – Community Commercial
  - TC – Town Center Commercial
  - SC – Service Commercial
  - GC – Gateway Commercial
- Industrial Districts
  - BPI – Industrial/Business Park
  - LI – Light Industrial
  - HI – Heavy Industrial

4.10.2 Impact Analysis

Methodology and Significance Thresholds

The analysis in this section focuses on the compatibility of land uses identified in the proposed project with existing and planned land uses within the General Plan Area, as well as consistency with any applicable land use plans, policies, or regulations. The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. For purposes of this EIR, implementation of the

proposed 2040 General Plan may have a significant adverse impact if it would do any of the following:

1 Physically divide an established community

2 Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect

3 Conflict with any applicable habitat conservation plan or natural community conservation plan

Project Impacts and Mitigation Measures

Threshold:	Physically divide an established community.

IMPACT LU-1 IMPLEMENTATION OF THE PROPOSED 2040 GENERAL PLAN WOULD PROVIDE FOR ORDERLY DEVELOPMENT IN THE TOWN OF WINDSOR AND WOULD NOT PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Town of Windsor has land available for new development. Windsor contains approximately 855 developable acres in a variety of land uses. Based on the buildout capacity of approximately 855 acres, under full buildout of the 2040 General Plan an estimated 11,067 new residents and 3,910 new dwelling units would be added to Windsor. The residential growth is anticipated to result in up to 2,241 new single family residences and 1,669 new multi-family housing units. This is roughly equivalent to an average annual growth rate of 1.37 percent through the year 2040. The increased land uses are anticipated to generate 2,860 new jobs in the Town by the year 2040 in the service, industrial, retail, and office divisions. This is roughly equivalent to 1.6 million square feet of non-residential uses. The full capacity of the vacant and underutilized non-residential land far exceeds this projected non-residential growth. The 2040 General Plan assumption for non-residential growth is based on market projections prepared by Applied Development Economics for the General Plan Update. This assumption ensures that the General Plan analysis does not result in overstated impacts, but provides flexibility in the event the Town is able to attract additional employers or industries by 2040.

The Town of Windsor has a unique identity that the 2040 General Plan seeks to enhance by providing a policy framework for the preservation of resource lands and the design of new development. A principal philosophy of Windsor is to manage growth to retain the Town's small size and rural atmosphere and respect natural resources. To support this philosophy, the Town has a growth management strategy that accommodates change in a measured and thoughtful fashion. The location and timing of growth in Windsor will be planned, taking into consideration the principal philosophy of infill development over development at the fringe, infrastructure capacity, public service availability, and fiscal impacts. The original 1996 General Plan directed the Town to adopt and maintain an Urban Growth Boundary (UGB) defining the extent of the town's future urbanization. In January 1998 Windsor voters approved Measure A, which established in the General Plan a 20-year UGB. Goal LU-7 of the 2040 General Plan establishes an Urban Growth Boundary with sufficient land to accommodate the Town's growth through the year 2040. As described in the Section 2, *Project Description*, concurrent with the 2040 General Plan Update, the Town of Windsor is proposing that the Town's UGB be renewed for 22 years. The Town is also proposing that the UGB be expanded to include an additional 22.5 acres of land, representing less

than one-half of one percent of the total land area within the current Town of Windsor. Renewal and expansion of the UGB will require approval of a ballot measure by voters. The Town Council has scheduled a special election for November 7, 2017 to extend the UGB for another 22 years.

The 2040 General Plan seeks to preserve resource areas, encourage and support rural and agricultural uses outside the UBG, and establish a well-defined community edge. A principal philosophy of the General Plan is the prioritization of infill development over development at the fringe. This approach helps create more efficient and cost-effective infrastructure, maximizes the use of underutilized parcels within the Town, and minimizes the loss of open space. New development at the Town's edge will provide a sense of transition between active farmland at the Town's edge and development within the Town. The preservation of natural resource areas outside the UBG will be further accentuated by the creation of "gateways" at the Town's northern and southern boundaries. By developing gateways, the Town will establish a clear entryway and exit to the community and exhibit high-quality design concepts that convey an image consistent with the Town's identity – as an entryway to the Sonoma County wine country and Russian River recreation area. Goal LU-6 of the 2040 General Plan encourages an orderly, contiguous pattern of development that prioritizes infill development, preserves resources, enhances livability, strengthens the local economy, and furthers Windsor's small town feel.

The following 2040 General Plan policies would maintain existing communities within the Town of Windsor and would ensure that with implementation of the 2040 General Plan, established communities would not be divided:

Land Use and Community Design Element Policies

Policy LU-6.1 ***Sustainable Land Use Pattern*****.** The Town shall strive to provide an overall pattern of land uses that encourages sustainable development; creates a safe and attractive public realm; provides an interconnected network of streets; offers convenient alternatives to auto travel; ensures compatibility among uses; enhances livability and public health; sustains economic vitality; preserves open space and agricultural resources; and reduces air pollution, greenhouse gas emissions, and energy consumption.

Policy LU-6.2 ***Land Use that Supports Active Transportation*****.** The Town shall maintain a land use plan and policy framework that support walking, biking, and transit ridership.

Policy LU-6.3 ***Encourage Higher Intensity Development in Appropriate Locations*****.** The Town shall encourage higher intensity uses where they would:

a. Be within a reasonable walking distance of the Downtown/Station Area or other commercial/service areas;

b. Take advantage of convenient access to U.S. 101 and the Town's crosstown streets; or

c. Take maximum advantage of existing and future public transit stops, specifically bus and rail service.

Policy LU-7.1 ***Establish Urban Growth Boundary*****.** An Urban Growth Boundary is established as shown on the Land Use Plan Map (Figure LU-1) to encourage a compact, cohesive pattern of urbanization with definite, identifiable boundaries that more readily create a sense of community identity. No new Town development other than that authorized by the Open Space, Parks, and Public/Quasi-Public/Institutional land use designations shall be permitted outside the Urban Growth Boundary.

Policy LU-7.2 *Factors*. The Urban Growth Boundary is based on a number of factors intended to promote orderly and efficient development within the Town. These factors include natural features, such as creeks and hills, Sonoma County's community separators, availability of utilities, proximity to existing urban uses, property lines, ~~and~~ the productivity of farmlands, and the need to accommodate future growth of the Town.[3]

Policy LU-7.3 *Exclude Natural Areas from UGB*. Areas that have limited potential to accommodate urban development are not included in Windsor's Urban Growth Boundary. Such areas may include those that have extensive sensitive biological habitats supporting rare and endangered species, oak woodlands, and wetlands; active and viable agricultural production; or extensive areas of community separators.

Policy LU-7.4 *SOI Boundary Consistent with UGB*. ~~Propose~~ Maintain a Sphere of Influence that is consistent with the Urban Growth Boundary.[3]

Policy LU-7.7 *Set Development Priority Areas*. Set priorities for the development of areas within the Sphere of Influence, considering proximity to existing urban development, availability of public services and utilities, fiscal effects for the Town, and protection of Williamson Act land contracts.

Policy LU-7.8 *Assign Development Priority Areas*. The Town should ~~assign priorities for~~ prioritize areas for development ~~of areas~~ within the Urban Growth Boundary. The ~~designation of priority areas~~ priorities should be reevaluated periodically ~~every five years, at a minimum~~. The purpose of the prioritization is to direct the location and timing of development so that it occurs in an orderly manner consistent with the availability of community services and utilities.[3]

Policy LU-7.9 *Factors for Identifying Development Priority Areas*. ~~The Town shall identify development~~ Prioritization of development with the Urban Growth Boundary Shall ~~priority areas considering~~ consider the following factors:

a. Are urban services and facilities provided by the Town and other public agencies available or expected to be available?

b. Is the area adjacent to existing urban uses?

c. Will the development of the area promote "infill" development within the existing town limits?

d. If residential, would the development maintain Windsor's single family character~~, as described in Policy LU-2.1 of this chapter~~?

e. Would the development encourage neighborhood centers which may include complementary retail services, public facilities, and uses/amenities that enliven the streets?

f. Would the development avoid lands under Williamson Acts contracts, unless such contracts are due to expire through nonrenewal prior to construction?

g. Is the area desired for future public facilities, such as schools and fire stations?

h. Would the development have a net adverse fiscal effect on the Town?

[3] Strike out and underlines shows the changes to the 2040 General Plan policies that would come into effect as part of the 2017 UGB ballot measure. If the 2017 UGB ballot measure does not pass, the strike out and underline will not be incorporated into the 2040 General Plan. This EIR assumes passage of the 2017 UGB ballot measure.

i. Would the development of the area provide an opportunity to protect public health and safety by upgrading failing septic systems that may degrade water quality?[3]

Policy LU-7.10 ***Annexation Initiation*****.** The Town does not actively seek to annex unincorporated lands. Annexation should generally be initiated by the property owner.

Policy LU-7.11 ***Concurrency*****.** Ensure that growth occurs concurrently with the provision of adequate services and infrastructure.

Policy LU-7.12 ***Limit Service Outside UGB*****.** Sewer, water, and other Town services shall not be extended to new development outside the Urban Growth Boundary nor shall service to existing development outside the Urban Growth Boundary be expanded unless the Town Council makes each of the following findings:

a. The land use to which the service would be extended or expanded is consistent with all applicable policies of the Town's General Plan ~~in effect as of October 2, 1997~~; and

b. The land use to which the sewer service would be extended or expanded is compatible with open space uses as defined in the General Plan ~~in effect as of October 2, 1997~~, does not interfere with accepted agricultural practices, and does not adversely affect the stability of land use patterns in the area; and

c. The property to which the service would be extended or expanded is immediately adjacent to land already served by the service(s) to be extended; and

d. Specific Circumstances, unique to the property to which the service would be extended or expanded would otherwise deprive the property of privileges enjoyed by other comparable property outside the Urban Growth Boundary and in the vicinity of the property to be served; and

e. In addition to payment of applicable capacity fees and connection charges, the property to which the service would be extended or expanded shall bear the cost of extending and/or expanding the Town pipes and appurtenances for water, sewer, and/or recycled water service to the property, including an alignment of the service that is determined by the Town Engineer and in compliance with Town Standards; and

f. The property to which the service would be extended or expanded shall be subject to the same rules and regulations as other Town customers for water, sewer, and/or recycled water service to the property, said rules and regulations at the time of application including but not limited to water conservation measures, metering of individual residential units, pretreatment, fire service, etc.[3]

Policy LU-7.13 ***Exceptions to Policy LU-7.10*****.** Policy LU-7.10 shall not be applied:

a. In any manner that impairs the rights of any recipient of Town services outside the Urban Growth Boundary where those rights are granted to the recipient by a valid contract between the recipient and the Town and entered into prior ~~to October 2, 1997~~ November 7, 2017; or

b. In any manner that impairs the Town's ability to supply treated wastewater for the irrigation of agricultural land; or

c. To limit the extension of water and/or sewer service to existing development if the Town Council finds, based on substantial evidence in the record before it, that the extension is

necessary to replace failing septic and/or water systems and that the capacity of the extension does not exceed that required to serve development existing in the area receiving the extension as of ~~October 2, 1997~~ November 7, 2017.[3]

Policy LU-8.1 *Maintain Growth Control Ordinance*. The Town shall maintain a Growth Control Ordinance that establishes a rate of residential growth that is a function of the available capacity in the transportation, water, wastewater, and school systems, and is consistent with the Capital Improvement Program.

In addition to limiting development to within the UGB, growth is further directed with the designation of Development Priority Areas and compliance with proposed 2040 General Plan Land Use policies. Development Priority Areas would direct the location and timing of development so that it occurs in an orderly manner consistent with the availability of community services and facilities (Policy LU-7.8). Policy LU-7.11 ensures that growth will occur concurrently with the provision of adequate services and infrastructure. The 2040 General Plan supports the Town's Growth Control Ordinance, adopted in 1997 and amended several times. The Ordinance enforces the Town's growth management policies by accommodating growth anticipated under the General Plan, and to manage new growth so that it occurs concurrently with necessary public services, facilities, and infrastructure.

The Town of Windsor Zoning Ordinance is one of the primary means of implementing the General Plan. Adoption of the 2040 General Plan would require a review of the Zoning Ordinance and Zoning Map to make sure that it is consistent with the 2040 General Plan. Specifically, revisions to the Zoning Map would need to be consistent with the 2040 General Plan, incorporating revisions to the land use categories and other recommended design and development standards. The Land Use and Community Design Element within the 2040 General Plan applies similar land use designations as the Town's 1996 General Plan, however the description and standards for each have changed; for example, new minimum and maximum densities have been established and floor area ratios have been revised to be consistent with the Plan's updated goals and policies. Furthermore, the 2040 General Plan proposes fewer or new land use designations that would need to be reflected in the Zoning Code. Two residential land use designations, Compact Residential and Mobile Home Park, would need to be removed from the Zoning Code, and the allowable densities of the remaining proposed residential land use designations would need to be revised. The proposed Commercial and Mixed-Use Land Use Designations are similar, but now include allowable floor area ratios.

The Town adopted the Station Area/Downtown Specific Plan in 2012, which supersedes the Town of Windsor 1997 Downtown Plan. In anticipation of Sonoma Marin Rail Transit (SMART) service extending to Windsor, the Town has constructed the station, which currently serves as a hub for bus transit connections. A half-mile radius around the station forms the Planning Area for the Station Area Downtown Specific Plan. The Plan extends the Downtown core, by promoting transit oriented development around the station, ultimately creating a vibrant, walkable and well-connected Downtown with links to other North Bay communities.

While the Town of Windsor controls land use decisions within Town limits, the County makes the land use and development decisions for areas surrounding the Town limits. In order to achieve the growth management policies established in the 2040 General Plan, the Town plans to coordinate closely with other agencies, particularly Sonoma County and the Local Agency Formation Commission (LAFCO). Policy LU-9.1 states that it is Town, County, LAFCO policy that existing and future urban development should be located within cities. This policy would be implemented through agreements with Sonoma County and LAFCO. Pursuant to Policy LU-9.6, the Town will be

supportive of Sonoma County's efforts to achieve regional solutions related to land use, transportation, climate change, water supply sources, solid waste, and the preservation of open space and natural resources when they are consistent with the Town's General Plan.

The 2040 General Plan includes many growth management strategies that would: 1) direct new growth within the Town's established Urban Growth Boundary; 2) further directs new growth to Development Priority Areas to ensure growth is orderly and consistent with the availability of community services and facilities; 3) require new growth is subject to the Town's concurrency policies; and 4) support intergovernmental cooperation to achieve the Town's growth management goals and policies. The 2040 General Plan does not include substantial land use or circulation changes that would physically divide an established community, residential, or otherwise (for example, no major roads or other facilities would be constructed that would physically divide an established community). In addition, the 2040 General Plan supports a 22-year renewal of the UGB. The renewed UGB would include three additional parcels totaling 22.5 acres. If the Town votes in favor of a renewed UGB in the November 2017 election, future growth and land use changes would be limited to the new UGB. Additionally, the 2040 Plan would require all new development that proposes or is required to construct or extend streets to develop a transportation network that complements and contributes to the Town's multimodal system, maximizes connections, and minimizes barriers to connectivity (Policy M-1.4); therefore, this impact would be less than significant.

Mitigation Measure

Impacts would be less than significant; therefore, mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

IMPACT LU-2 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD BE GENERALLY CONSISTENT WITH APPLICABLE REGIONAL LAND USE PLANS, POLICIES, OR REGULATIONS SUCH AS ABAG/MTC'S PLAN BAY AREA 2040. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Several regionally and locally adopted land use plans, policies, and regulations apply to development under the 2040 General Plan. These include ABAG/MTC Regional Transportation Plan/Sustainable Communities Strategy (ABAG 2017b) and Bay Area Air Quality Management District's (BAAQMD) Bay Area 2017 Clean Air Plan[4]. Consistency of the proposed project with the 2017 Bay Area Clean Air Plan is discussed under Impact AQ-2 of Section 4.3, *Air Quality*.

The ABAG/MTC's Plan Bay Area is a long-range land use and transportation plan for the San Francisco Bay Area region. The plan contains ten goals with performance targets to meet these goals that seek to promote healthy and safe communities by reducing impacts from air pollution,

[4] Please note that Northern Sonoma County Air Pollution Control District's (APCD) jurisdiction is only a small area within Windsor (that area is a part of the North Coast Air Basin). However, the Sonoma County APCD does not have an air quality management plan.

protecting open space and agriculture, and increasing active transportation. Table 20 includes the seven Plan Bay Area goals and their related performance targets as well as whether the 2040 General Plan would be consistent with the goal.

Table 20 2040 General Plan Consistency with Plan Bay Area 2040 Goals

Plan Bay Area Goals	2040 General Plan Consistency
Goal 1 Climate Protection	
Target. Reduce per-capita CO_2 emissions from cars and light-duty trucks by 15 percent.	**Consistent.** The GHG goals and policies within the 2040 General Plan support climate protection. The GHG goal of the *Environmental Resources* chapter, Goal ER-5, is to improve the sustainability and resiliency of Windsor through compliance with local, State, and Federal policies and standards that aim to reduce GHG emissions in the community. Policies within this chapter, ER-5.1 and 5-2, set specific targets to reduce emissions every ten years at both the community and municipal levels. Both policies would require community and municipal emissions to be reduced by 60 percent below the 1990 level by 2040. Policy ER-5.3 would require new development and Public Works projects within the Town to meet a 1.91 MT CO_2e per service population per year efficiency target prior to 2030, a 1.12 MT CO2e per service population per year efficiency target from 2030 to 2040, and a 0.49 MT CO2e per service population per year efficiency target from 2040 to 2050. This would ensure a reduction of GHG emissions in line with the reduction trajectory needed to meet the 2050 statewide emissions target.. Other GHG policies include reduced emissions for Town operations, energy conservation through land use patterns that reduce operational energy requirements, and requirement for new construction to meet the Town's energy performance standards. Therefore the Town's 2040 General Plan would be consistent with this goal.
Goal 2 Adequate Housing	
Target. House 100 percent of the region's projected growth by income level without displacing current low-income residents and with no increase in commuters over the Plan baseline year.	**Consistent.** The Land Use and Community Design Element of the 2040 General Plan includes provisions for providing adequate housing. Urban Growth Boundary Policy LU-7.17 would amend the Urban Growth Boundary to accommodate state-mandated housing needs for all economic segments of the community. Specifically, this policy states that the Town council may amend the Urban Growth Boundary designated on the Land Use Map in order to accommodate lands to be designated for residential uses, provided that no more than 10 acres of land may be brought within the Urban Growth Boundary for this purpose in any calendar year. A request for such an amendment must be accompanied by a specific housing proposal. Further, Policy LU-8.3 would allow exemptions from the Town's the annual growth control allocations (i.e. Growth Control Ordinance) in order to accommodate affordable and special needs housing from the annual growth control allocations. Therefore the Town's 2040 General Plan would be consistent with this goal.
Goal 3 Healthy and Safe Communities	
Target. Reduce adverse health impacts associated with air quality, road safety, and physical inactivity by 10%.	**Consistent.** Air Quality goals and policies within the 2040 General Plan promote the reduction of particulate matter thereby supporting health and safe communities. The Air Quality goal of the *Environmental Resources* chapter, Goal ER-4, and accompanying policy ER-4.1 would require the Town to coordinate with BAAQMD, NSCAPCD, and the California Air Resources Board (ARB) to meet State

Plan Bay Area Goals	2040 General Plan Consistency
	and national ambient air quality standards in order to protect all residents from the health effects of air pollution. Policy ER-4.2 requires development projects comply with Federal and State Air Quality standards. Further, Policy ER- 4.3 requires development projects incorporate feasible measures that reduce construction and operational emissions for reactive organic gases, nitrogen oxides, and particulate matter PM_{10} and $PM_{2.5}$. Therefore the Town's 2040 General Plan would be consistent with this goal. The Transportation and Mobility Chapter of the 2040 General Plan contains policies that address safety and promote active transportation. Complete Streets Policy M-2.3 requires the Town to design streets to be safe and convey a sense of security, and to be comfortable for all travel modes, including motor vehicles, pedestrians, and bicyclists. Streets and Roadways Policy M-3.12, addresses traffic operations, including congestion, intersection delays, and travel speeds, while balancing neighborhood livability and safety concerns. Streets and Roadway Policy M-3.13 requires the Town to "calm" or slow traffic in residential neighborhoods through application of a variety of techniques without compromising safety. Streets and Roadways Policy M-3.14 requires the Town to implement traffic calming measures in the downtown and accident prone hotspot locations, as well as near schools, the library, and other public facilities, as appropriate to improve safety. Therefore the Town's 2040 General Plan would be consistent with this policy. The policies of the 2040 General Plan are consistent with Plan Bay Area's Goal 4. Walkable and Bikeable Policy M-4.6 requires the Town to improve bicycle safety by expanding the use of separated bicycle lanes, green bicycle lanes, and adequate lighting, particularly around schools and in other areas where bicycle safety is a concern. Walkable and Bikeable Policy M-4.9 requires the Town to develop safe and convenient bikeways and pedestrian crossings that reduce conflicts that between pedestrians, bicyclists, and motor vehicles on streets, multi-use trails, and sidewalks. The Transportation and Mobility Chapter of the Windsor 2040 General Plan contains goals and policies that promote the expansion of the bicycle network, integrated with recreational trails, paths, and sidewalks, to create an interconnected network for both bicyclists and pedestrians. Policy M-3.12, Traffic Management, addresses traffic operations, including congestion, intersection delays, and travel. Therefore the Town's 2040 General Plan would be consistent with this goal.
Goal 4 Open Space and Agricultural Preservation	
Target. Direct all non-agricultural development within the urban footprint (existing urban development and UGBs).	**Consistent.** A principal philosophy of the Town's 2040 General Plan is the prioritization of infill development on underutilized parcels within an Urban Growth Boundary, which would minimize the loss of open space and support rural and agricultural uses outside of the UGB. The goals and policies of the Environmental Resources Chapter of the 2040 General Plan places high value on environmental resources and is committed to the preservation of open space and agricultural lands. Policy ER-1.1 states that the Town shall seek to preserve open space resources, including productive farmlands, through avoidance of development in these areas. Open Space Policy ER-1.4 and Agricultural Lands Policy ER-2.4 supports advocacy efforts by the Sonoma County Agricultural Preservation and Open Space District, the Sonoma Land Trust, and other public agencies or public-benefit organizations to acquire easements to preserve non-urban lands for

Plan Bay Area Goals	2040 General Plan Consistency
	open space and agriculture in the General Plan Area. Therefore, the Town's 2040 General Plan would be consistent with this goal.
Goal 5 Equitable Access	
Target. Increase the share of affordable housing in PDAs, Transit Priority Areas (TPA), or high-opportunity areas by 15%. **Target**. Decrease the share of low-income residents' household income consumed by transportation and housing by 10% **Target**. Do not increase the share of low- and moderate-income renter households in PDAs, TPAs, or high-opportunity areas that are at risk of displacement.	**Consistent.** The Land Use and Community Design Element of the 2040 General Plan includes provisions for providing adequate housing. Urban Growth Boundary Policy LU-7.17 would amend the Urban Growth Boundary to accommodate state-mandated housing needs for all economic segments of the community. In addition, Policy LU-8.3 would allow exemptions from the Town's the annual growth control allocations (i.e. Growth Control Ordinance) in order to accommodate affordable and special needs housing from the annual growth control allocations. The Transportation and Mobility Element, Policy M-2.10, requires that the Town ensure that commercial and residential development, including affordable housing projects, provides convenient and direct connections to the nearest existing bikeways, pedestrian ways, and public transit facilities. The Town's 2015-2035 Housing Element was designed to ensure that the Town is meeting its State Regional Housing Need Allocation and serves as a guide for residential development in the Town. The Housing Element identifies and analyzes existing and projected housing needs to preserve, improve, and develop housing for all economic segments in the community. Therefore the Town's 2040 General Plan would be consistent with this goal.
Goal 6 Economic Vitality	
Target. Increase by 38% the number of jobs in predominantly middle-wage industries. **Target.** Reduce per-capita delay on the Reginal Freight Network by 20%. **Target.** Increase by 20% the share of jobs available within 30 minutes by auto or within 45 minutes by transit in congested conditions.	The goals and policies in the Economic Development Element of the 2040 General Plan supports the development of a healthy and diverse base of business, and promotes new ideas and innovation to fulfill its untapped economic potential. Economic Development Goal ED-1 supports an increase in the tax base and the creation of local job opportunities through business attraction, retention, and expansion. Economic Development Goal ED-2 promotes reinforcing the Downtown as the civic and heart of Windsor. Supportive Downtown policies include investment in the public realm and emphasis of civic and community uses, expanding the Downtown employment base through increase opportunities for office development, expanding Downtown attractions and promote the capitalization of a SMART commuter rail station. Economic Development Goal ED-3 would ensure Windsor's long term success and economic sustainability by diversifying and expanding tourism attractions, highlighting the unique history and character of the Town. Economic Development Goal ED-4 encourages partnerships and collaboration amongst the Town and business community to highlight Windsor as the model for community leadership and innovation. Therefore the Town's 2040 General Plan would be consistent with this goal.
Goal 7 Transportation System Effectiveness	
Target. Increase non-auto mode share by 10%. **Target.** Reduce per-rider transit delay due to aged infrastructure by 100%. **Target.** Reduce vehicle operating and maintenance costs due to pavement conditions by 100%.	The Transportation and Mobility Chapter of the 2040 General Plan promotes an efficient circulation system for all modes of travel by providing ample connections locally and regionally. Highway 101 bisects the community north-south, creating inefficiencies in the circulation network and a barrier between the two sides of Town. The goals and policies of this Element address a balanced transportation network that will support and encourage walking, bicycling, and

Plan Bay Area Goals	2040 General Plan Consistency
	transit ridership while continuing to improve automobile travel. Multimodal Circulation System Policy M-1.1 requires the Town to implement a multimodal transportation system that connects residents to activity centers throughout and near town, such as commercial centers and corridors, employment centers, the SMART train stop, the airport, schools, parks, recreation areas, and other attractions. Multimodal Circulation System Policy M-1.2 encourages the Town to consider appropriate reductions to project trip generation through a multimodal system approach that increases transit ridership, biking, and walking. Multimodal Circulation System Policy M-1.3 encourages the Town to develop facilities and services that enable bicycling, walking, and transit to become more widely-used modes of transportation and recreation. Multimodal Circulation System Policy M-1.4 requires all new development that proposes to construct or extend streets to develop a transportation network that complements and contributes to the Town's multimodal system, maximizes connections, and minimizes barriers to connectivity. Complete streets goals and policies would provide "complete streets" with facilities and amenities that meet the needs of all users, regardless of their age or ability, or whether they are walking, bicycling, taking transit or driving. The Streets and Roadways goals and policies support providing an interconnected street network while retrofitting and maintaining streets, and bridge maintenance. Therefore, the Town's 2040 General Plan would be consistent with this goal.

Source: ABAG 2017a.

As shown in Table 20, the proposed project would be generally consistent with the goals contained in the *Plan Bay Area 2040*. As discussed within this impact discussion, implementation of the proposed project would be generally consistent with applicable adopted plans, regulations, or policies.

Mitigation Measure

Impacts would be less than significant without mitigation; therefore, no mitigation is required.

Threshold:	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

IMPACT LU-3 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD NOT CONFLICT WITH THE SONOMA COUNTY COMPREHENSIVE AIRPORT LAND USE PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Although the Charles M. Shultz Sonoma County Airport is not located within the General Plan Area, the southern two-thirds of the Town of Windsor is located within the Sonoma County Airport Influence Area. One of the planned future airport expansion areas located south of Shiloh Road and east of Windsor Road, is adjacent to the Town's current UGB. The 2040 General Plan Land Use Map designates this area Public/Quasi-Public (PQP) use. The PQP designation is applied to the Town's major public buildings and facilities owned by the Town, Sonoma County, State, Federal, other public agencies that serve the general public, or private institutional uses. This classification includes

public schools, libraries, government, police, and fire facilities; corporation yards; private utilities; the wastewater plant; and cemeteries. The existing use is a cemetery, specifically the Shiloh Cemetery District. The cemetery use would not conflict with the planned future airport expansion area south of the cemetery.

In addition, the 2040 General Plan supports a 22-year renewal of the UGB, which would also expand the UGB by 3 parcels, or 22.5 acres. Neither the expansion of the UGB nor implementation of the General Plan would conflict with this future expansion area or any other future expansion areas planned by the Sonoma County Airport Land Use Commission (Sonoma County Airport Land Use Commission 2016); therefore, the 2040 General Plan does not conflict with the Sonoma County Airport Land Use Plan.

Implementation of the following 2040 General Plan goals and policies would ensure that future land use changes within the Airport Influence Area are consistent with the Sonoma County Comprehensive Airport Land Use Plan.

Land Use and Community Design Goals and Policies

Goal LU-9: Coordinate with the County, LAFCO, and others in the implementation of Windsor's desired land use pattern.

Policy LU-9.4 *Airport Land Use Commission Referrals*. The Town shall ensure that proposals within Airport Land Use Commission (ALUC) referral areas consider land use policies in the ALUC Policy Plan and will review and condition development proposals, as appropriate, to ~~ensure~~ strive for compliance with ALUC regulations.

Policy LU-9.5 *Airport Coordination*. The Town shall coordinate with the Sonoma County Airport on airport activities, operations, and expansion plans that might impact land use and economic decisions by the Town.

Goal PHS-6: Airport Safety. Minimize the risks to lives and property due to operations associated with the Charles M. Schultz Airport.

Policy PHS-6.1 *Sonoma County Airport Land Use Compatibility Plan Criteria*. The Town shall continue to establish noise and safety compatibility criteria in the Airport Safety (AS) overlay district consistent with the provisions of the Comprehensive Airport Land Use Plan for Sonoma County.

Policy PHS-6.2 *Development Proposal Review*. The Town shall review development proposals and land uses within the "AS" overlay district for compliance with district regulations and modify or condition projects as necessary to maintain compliance.

Policy PHS-6.3 *Sonoma County Airport Land Use Compatibility Plan Consistency*. The Town shall ensure its policies, plans, and ordinances are consistent with the Airport Land Use Compatibility Plan.

Policy PHS-6.4 *Airport Land Use Commission Review*. The Town shall ensure that all applicable plans, ordinances, and development applications are submitted to the Sonoma County Airport Land Use Commission (ALUC) for review, if required by State law.

Policy PHS-6.5 *Airport Open Space Requirements*. Maintain the open space areas shown on Figure PHS-4 to satisfy the open land area requirements of the California Airport Land Use Planning Handbook (Caltrans Aeronautics Division) and the Sonoma County Comprehensive Airport Land Use Plan for lands located within a designated "Traffic Pattern Zone" area.

Mitigation Measure

Impacts would be less than significant without mitigation; therefore, no mitigation is required.

Threshold:	Conflict with any applicable habitat conservation plan or natural community conservation plan.

IMPACT LU-4 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD NOT CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.4, *Biological Resources*, the General Plan Area is located within the planning area for the Santa Rosa Conservation Strategy (Conservation Strategy), which is overseen by the USFWS. The Conservation Strategy creates 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 designates areas in the southern portion of the General Plan Area as having the potential for the presence of the California tiger salamander and listed plants. The 2040 General Plan supports the renewal of the Town's UGB, which would limit the expansion of the Town's growth to only three parcels, or 22.5 acres, located immediately contiguous to the southwestern boundary of the Town. These three parcels that are not identified as potential for California tiger salamander or sensitive plant species. In addition, Goals ER-1, ER-3, and ER-6 and Policies ER-1.1, -1.2, -3.1, -3.2, -6.1, 6-.7, and -6.8 in the 2040 General Plan promote conservation and protection of valuable habitat and sensitive resources. Therefore, implementation of the proposed 2040 General Plan or any development that may occur as a result of implementation of the General Plan would not conflict with any habitat conservation plan or natural community conservation plan and impacts associated with potential inconsistencies with such plans would be less than significant.

Mitigation Measure

Impacts would be less than significant; therefore, no mitigation is required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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4.11 Noise

This section analyzes noise impacts from buildout of the 2040 General Plan. Impacts related to noise from construction, building operations, traffic, and flight operations are addressed.

4.11.1 Setting

Overview of Noise and Vibration Measurement

Noise

Noise is defined as unwanted sound that disturbs human activity. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with human hearing response, which is most sensitive to frequencies around 4,000 Hertz (similar to the highest note on a piano) and less sensitive to frequencies below 100 Hertz (similar to a transformer hum).

Sound pressure level is measured on a logarithmic scale with the 0 dB level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dB, and a sound that is 10 dB less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dB greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while those along arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise levels typically attenuate (drop off) at a rate of 6 dB per doubling of distance from point sources such as industrial machinery. Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dB per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dB per doubling of distance.

In addition to the instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a one-hour period.

The time period in which noise occurs is also important since nighttime noise tends to disturb people more than daytime noise. Two commonly used noise metrics – the Day-Night average level (Ldn) and the Community Noise Equivalent Level (CNEL) - recognize this fact by weighting hourly Leqs over a 24-hour period. The Ldn is a 24-hour average noise level that adds 10 dB to actual nighttime (10:00 P.M. to 7:00 A.M.) noise levels to account for the greater sensitivity to noise during that time period. The CNEL is identical to the Ldn, except it also adds a 5 dB penalty for noise occurring during the evening (7:00 P.M. to 10:00 P.M.). Noise levels described by Ldn and CNEL

typically do not differ by more than 1 dBA. In practice, CNEL and Ldn are often used interchangeably.

Vibration

Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called groundborne noise. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Groundborne vibration related to human annoyance is generally related to root mean square (RMS) velocity levels expressed in vibration decibels (VdB). However, construction-related groundborne vibration in relation to its potential for building damage can also be measured in inches per second (in/sec) peak particle velocity (PPV) (Federal Transit Administration 2006). Based on the Federal Transit Administration's (FTA) *Transit Noise and Vibration Impact Assessment* and the Caltrans') *1992 Transportation-Related Earthborne Vibration, Technical Advisory*, vibration levels decrease by 6 VdB with every doubling of distance.

The background vibration velocity level in residential and educational areas is usually around 50 VdB. (FTA 2006). The threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is rarely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. The Town's 1996 General Plan defines noise-sensitive land uses as residential neighborhoods, schools, houses of worship, hospitals, and convalescent homes. Sensitive land uses generally should not be subjected to noise levels that would be considered intrusive in character. Noise-sensitive residential areas are clustered to the east of Highway 101 and in the west-central and northwest parts of Windsor (Windsor 2015a). Residences located near Highway 101, Old Redwood Highway, and other arterials roadways may experience elevated noise levels.

Existing Noise Conditions and Sources

The most common and primary sources of noise in Windsor, as in most communities, are motor vehicles moving along roadways. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create a sustained noise level, and because of its proximity to noise-sensitive uses. Roadways with the highest traffic volumes and the highest speeds produce the highest noise levels. These roadways include Highway 101, Old Redwood Highway, Shiloh Road, Windsor River Road, and Hembree Lane (Town of Windsor 1996). Many residences are located adjacent to these roadways. Highway 101 and Old Redwood Highway, both of which run through the entire town diagonally from southeast to northwest, are flanked by housing developments (Windsor 2015a). There are also several schools and churches near or adjacent to Old Redwood Highway in the southern half of Windsor. Hembree Lane, which is located on the east side of Windsor, nearly entirely runs through residential areas. Shiloh Road is adjacent to homes at its

eastern end where it intersects with Old Redwood Highway. Finally, Windsor River Road runs through residential neighborhoods on its eastern and western ends within the town limit.

Rail traffic also contributes to ambient noise (Windsor 2015a). The Sonoma Marin Area Rail Transit (SMART) rail corridor traverses the entire town from north to south, and though it currently accommodates only freight trains, it is planned to also accommodate expanded rail commuter service in the future. A variety of land uses are adjacent to this railroad, including residential, industrial, public/institutional, and commercial. The railroad tracks branch out into various locations in the industrial district in the southern part of Windsor. Since several residences are also adjacent to this track, their occupants are susceptible to increased noise when trains pass through town. Currently, only freight service operates through Windsor. The North Coast Rail Authority (NCRA) re-established freight service through Windsor in 2011, after freight service had been discontinued in 2001. NCRA has updated the tracks to Class 2 and 3 standards appropriate for regional railroads. Class 2 standards permit speeds up to 25 miles per hour (mph) for freight trains and 30 mph for passenger trains, and Class 3 standards permit speeds up to 40 mph for freight and 60 mph for passenger trains. Northwest Pacific Railroad Company (NWPRR) operates the three freight lines on this rail. These freight lines include two freight trains, one 60-car train with service between Willits and Lombard, and one 25-car train with service between Lombard and Redwood Valley, as well as one 60-car solid waste transport train (Mendocino County Rail-with-Trail Corridor Plan, 2012). Trains operated by NWPRR pass through Windsor approximately one to two times per week (NWPRR 2017).

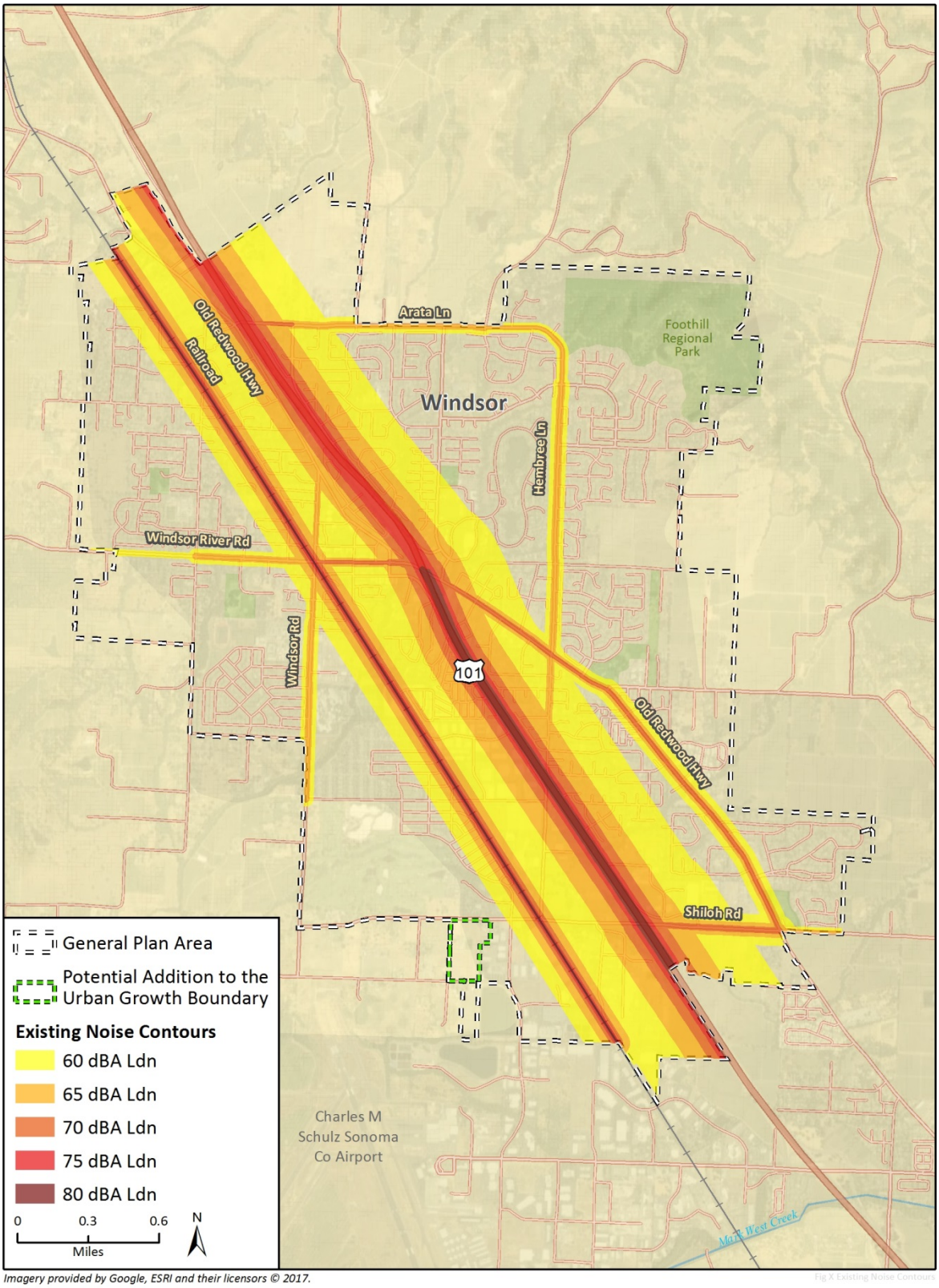
Passenger service on the tracks through Windsor is scheduled to begin in 2021, when the SMART rail will start providing passenger train service along the Sonoma-Marin corridor through Windsor. It is expected that the SMART rail will increase daily rail trips by 11 round trips per day (a total of 24 passbys through Windsor, including two turnaround trips for the line terminating at Windsor station), five days per week. Four SMART passenger lines will make stops in Windsor: the Cloverdale-Larkspur line will make four round trips per day, the Healdsburg-Larkspur line will make two round trips per day, the Windsor-Larkspur line will make three round trips per day, and the Healdsburg-Petaluma line will make two round trips per day; each line will be serviced by 2-car trains operating five days per week (SMART Final EIR, 2006). SMART passenger trains will increase the frequency of railway operations through Windsor, thereby increasing ambient noise levels.

Another noise source in Windsor is the Sonoma County Airport, which is located immediately south of the General Plan Area (Windsor 2015a). The primary flight pattern extends northwesterly of the airport, over the western portion of the town. The existing Town of Windsor General Plan (2015) identifies several projected noise contours of the Sonoma County Airport that reach into the town limits. The 55 dBA CNEL noise contour of the Sonoma County Airport reaches into small southwestern portions of Windsor. The 60 dBA CNEL contour area is even less intrusive into the town, and currently affects very few, if any, noise sensitive receptors on the town's southwest border.

Figure 16 maps average ambient noise levels from highways, arterial roadways, and rail traffic, expressed as noise contours. Roadway noise levels were calculated based on existing traffic volumes, average traffic speeds, and the percentage of truck traffic on roadways.

As shown in this figure, average ambient noise levels in Windsor are highest along Highway 101 and the railroad tracks. Estimated noise levels exceed 80 dBA Ldn at Highway 101 and the railroad tracks, 70 dBA Ldn at Old Redwood Highway and Shiloh Road, and 65 dBA Ldn at Windsor Road, Windsor River Road east of Starr Road, Hembree Lane, and Arata Lane. These noise levels are conservative because they do not account for local factors that reduce exposure to ambient noise:

Figure 16 Existing Noise Contours



intervening structures and topography between noise sources and receptors. For example, sound walls protect some residential neighborhoods from traffic noise generated on Highway 101.

On-site activities at existing land uses also contribute to the ambient noise environment in their immediate vicinity. Primary sources include agricultural operations, industrial uses, and service commercial uses such as automotive repair facilities, wrecking yards, tire installation centers, car washes, transfer yards, and loading docks (Windsor 2015a). The town's industrial districts are located in the southern end of Windsor, in between Highway 101 adjacent to the east and a railroad parallel to Highway 101 to the west of the industrial district. This area, combined with the railroad that services the industrial district, is a substantial source of existing noise in Windsor.

Regulatory Setting

Federal Noise Policies

There are no federal noise requirements or regulations that apply directly to the implementation of the 2040 General Plan. However, there are federal regulations that influence the audible landscape, especially for projects where federal funding is involved. For example, the FHWA requires abatement of highway traffic noise for highway projects through rules in the Code of Federal Regulations (23 CFR Part 772), the FTA, and Federal Railroad Administration (FRA). Each agency recommends thorough noise and vibration assessments through comprehensive guidelines for any highway, mass transit, or high-speed railroad projects that would pass by residential areas.

In addition, the Federal Aviation Administration (FAA) has prepared guidelines for acceptable noise exposure in its Federal Aviation Regulations Part 150 Noise Compatibility Planning program for airports. The program is aimed at balancing an airport's operational needs and its impact on the surrounding community. Its purpose is to reduce noise impacts on existing incompatible land use and to prevent the introduction of new incompatible land uses in the areas impacted by aircraft noise. It establishes standard noise methodologies and noise metrics, identifies land uses normally compatible with various levels of airport noise, and provides for voluntary development and submission of noise exposure maps and noise compatibility programs by airport operators. See discussion below regarding the Sonoma County Comprehensive Airport Land Use Plan.

State Noise and Vibration Policies

Title 24 of the California Code of Regulations codifies Sound Transmission Control requirements establishing uniform minimum noise insulation performance standards for new hotels, motels, dormitories, apartment houses, and dwellings other than single-family dwellings. Specifically, Section 1207.4 in Title 24 states that interior noise levels attributable to exterior noise sources shall not exceed 45 dBA CNEL in any habitable room of a new building.

While there are no State standards for vibration, Caltrans establishes vibration risk for structures. For continuous, frequent, and intermittent vibration, Caltrans considers the architectural damage risk level to be somewhere between 0.08 and 0.5 inches per second (in/sec) peak particle velocity (PPV) depending on the type of building that is affected.

Local Noise Policies

SONOMA COUNTY COMPREHENSIVE AIRPORT LAND USE PLAN

The Sonoma County Airport Land Use Commission (ALUC) governs the Sonoma County Airport through the Comprehensive Airport Land Use Plan (CALUP), as adopted in January 2001 and amended in March 2016. Sonoma County Airport is located over 870 feet southwest of the Windsor Town Limits and Urban Growth Boundary. The CALUP is intended to protect and promote the safety and welfare of residents near the public use airports in the county, as well as airport users, while promoting the continued operation of the six airports covered by the plan. Section 65302.3 of the Government Code requires general plans and applicable specific plans to be consistent with amended CALUPs.

1996 GENERAL PLAN

In the current Town of Windsor General Plan-2015 (1996 General Plan), adopted in March 1996 and revised in January 2013, the Public Health and Safety Chapter of the 1996 General Plan establishes policies to protect noise-sensitive land uses from exposure to excessive ambient noise. This chapter sets criteria for acceptable exterior noise standards according to land us, as shown in Table 21. For residential areas, these exterior noise guidelines generally apply to backyards. The Public Health and Safety Chapter also requires new residential projects and other noise-sensitive receptors to provide for an interior noise level of 45 dBA CNEL, consistent with the State's Title 24 standard.

Pursuant to Policy D.1.3, the Town should review residential and other noise sensitive land uses within 60 dBA CNEL contours to ensure that adequate noise attenuation has been incorporated into the design of the project, or that other measures are proposed to protect future "sensitive receptors." Furthermore, new development is encouraged to maintain the existing ambient noise level. If any development causes noise levels related to transportation sources to increase by more than 5 dB, mitigations and design features to offset that potential increase in noise are required. Alternatives to sound walls are encouraged, such as incorporating setbacks or directing the orientation of buildings to minimize sound exposure.

Policies in the Public Health and Safety Chapter also restrict new development near Sonoma County Airport to protect residents from airport hazards such as noise from overflights. Policy D.1.4 states that the Town should not permit residential development within the 60 dBA CNEL contour associated with Sonoma County Airport. Applications for new noise-sensitive development within the 60 CNEL contour must be accompanied by an acoustical analysis. In addition, the Community Development Chapter of the 1996 General Plan sets policy to mitigate noise generated by use of new parks, in order to avoid disturbance of adjacent residents.

Table 21 Town of Windsor Noise and Land Use Compatibility Guidelines

Land Use Category	Noise Exposure Levels (Ldn or CNEL, dBA)			
	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Residential – Low Density Single Family, Duplex, Mobile Homes	50-60	55-70	70-75	75-85
Residential – Multi-Family	50-65	60-70	70-75	75-85
Transient Lodging, Motels, Hotels	50-65	60-70	70-80	80-85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50-65	60-70	70-80	80-85
Auditorium, Concert Halls, Amphitheaters	NA	50-70	65-85	NA
Sports Arenas, Outdoor Spectator Sports	NA	50-75	70-85	NA
Playgrounds, Neighborhood Parks	50-70	NA	67.5-75	72.5-85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50-75	70-80	NA	80-85
Office Buildings, Business Commercial and Professional	50-75	67.5-77.5	NA	75-85
Industrial, Manufacturing, Utilities, Agriculture	50-75	70-80	NA	75-85

Land Use Acceptability Interpretation/Conditions:

1. Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involve are of normal conventional construction, without any special noise insulation requirements.

2. Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems, will normally suffice.

3. Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

4. Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Town of Windsor General Plan Public Health and Safety Chapter, 2014

TOWN OF WINDSOR ZONING ORDINANCE

Chapter 27.20 of the Zoning Ordinance sets maximum allowable exterior and interior noise levels at receiving land uses subject noise generated by activities on nearby properties. These allowable noise levels, shown in Table 22, vary by land use and time of day.

Table 22 Maximum Noise Levels by Receiving Land Use

Zone	Time Interval	Exterior Maximum Allowable Noise Level (dBA)	Interior Maximum Allowable Noise Level (dBA)
Single- or multi-family residential	7 AM to 10 PM 10 PM to 7 AM	55 50	35 45
Commercial	7 AM to 10 PM 10 PM to 7 AM	65 55	50
Industrial or Manufacturing	Any time	70	55
Public Parks, public open space, and Civic Centers	7 AM to 10 PM 10 PM to 7 AM	55 50	NA

Notes:

1. Each of the noise limits specified above shall be reduced by 5 dBA for impulse or simple tone noises, or for noise consisting of speech or music. If the ambient noise level exceeds the resulting standard, the ambient noise level shall be the standard.

2. It shall be unlawful for any person within a residentially zoned area of the town to operate any noise amplified device (e.g., bull horns, microphones, musical instruments, speakers, etc.), that exceeds a noise level of 45 dBA measured at the property line or cause loud excessive noise which disturbs the peace of the neighborhood.

Source: Town of Windsor, 2007

Source: Town of Windsor Zoning Ordinance, Chapter 27.20, Table 3-1.

In addition, Section 7-1-190 of the Code of the Town of Windsor restricts the timing of construction activities authorized by a Town permit to the hours of 7 a.m. to 7 p.m. Monday through Friday and 8 a.m. to 7 p.m. on Saturday.

4.11.2 Impact Analysis

Methodology and Significance Thresholds

In accordance with Appendix G of the CEQA Guidelines, a significant noise impact would occur if new development facilitated by the 2040 General Plan would:

1 Expose persons to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies;

2 Expose persons to or generate excessive groundborne vibration or groundborne noise levels;

3 Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;

4 Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;

5 Expose people residing or working in the project area to excessive noise levels within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport; or

6 Expose people residing or working in the project area to excessive noise levels within the vicinity of a private airstrip.

As described in Section 4.17, Effects Found Not to Be Significant, impacts related to aircraft noise were found to be less than significant and no new noise sensitive uses are proposed to be located in the vicinity of an airport. Impacts related to aircraft noise ~~and~~ are not discussed further in this section.

Construction Noise

This section estimates construction noise from development facilitated by the proposed General Plan based on reference noise levels reported by the FTA's *Noise and Vibration Impact Assessment* (2006) for various pieces of construction equipment. It is conservatively assumed that construction equipment typically operates as close as 50 feet from the nearest noise-sensitive receptors. Construction noise level estimates do not account for the presence of intervening structures or topography, which could reduce noise levels at receptor locations. New development facilitated by the 2040 General Plan would have a significant impact if temporary construction noise during permitted daytime hours could expose noise-sensitive receptors to adverse noise levels.

Groundborne Vibration

This analysis applies the following vibration thresholds established by the FTA for disturbance of people: 65 VdB for buildings where low ambient vibration is essential for interior operations (such as hospitals and recording studios), 72 VdB for residences and buildings where people normally sleep, including hotels, and 75 VdB for institutional land uses with primary daytime use (such as churches and schools). These thresholds apply to "frequent events," which the FTA defines as vibration events occurring more than 70 times per day. The thresholds for frequent events are considered appropriate because of the scale and duration of proposed construction activity. In addition, this analysis applies the following FTA thresholds in Table 23 for potential structural damage to buildings from construction vibration:

Table 23 Vibration-Related Building Damage Thresholds

Building Category	PPV (in/sec)	Approximately L_v
I. Reinforced-concrete, steel or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Source: FTA 2006.
PPV = peak particle velocity
in/sec = inches per second
L_v = root mean square velocity in decibels (VdB) re 1 micro-inch/second

On-Site Operational Noise

On-site activities at new development facilitated by the 2040 General Plan would have a significant impact if it would expose neighboring noise-sensitive land uses to noise levels exceeding the Town's standards shown in Table 22.

Increase in Traffic Noise

This analysis involves noise contour modeling to estimate noise levels associated with existing and future (year 2040) traffic on area roadways and railways. Projected traffic volumes in the year 2040, provided by W-Trans, are used to predict future noise contours. Existing and future noise contours are compared to assess the increase in noise-sensitive receptors' exposure to traffic noise during buildout of the proposed General Plan. Proposed policies are then evaluated for the ability to protect noise-sensitive receptors from excessive increases in ambient noise.

Exposure of New Noise-Sensitive Land Uses to Noise

This section analyzes noise exposure to new noise-sensitive land uses for informational purposes only because the Second District Court of Appeal found in 2011 that, as an impact of the environment on the project, it is not required for CEQA compliance (*Ballona Wetlands Land Trust et al. v. City of Los Angeles)*. Projected noise contours for the year 2040 were evaluated to estimate future exposure to ambient traffic and rail noise. Estimated noise levels were compared to the Town's proposed exterior noise compatibility standards shown in Table 26 and to the interior noise standard of 45 dBA CNEL.

Project Impacts and Mitigation Measures

Threshold:	Expose persons to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies.
Threshold:	Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

IMPACT N-1 CONSTRUCTION OF INDIVIDUAL PROJECTS FACILITATED BY THE 2040 GENERAL PLAN WOULD TEMPORARILY PRODUCE HIGH NOISE LEVELS, POTENTIALLY AFFECTING ADJACENT NOISE-SENSITIVE LAND USES. ALTHOUGH THE CODE OF THE TOWN OF WINDSOR'S TIMING RESTRICTIONS ON CONSTRUCTION ACTIVITY WOULD LIMIT NOISE DISTURBANCE, HIGH NOISE LEVELS DURING WORKING CONSTRUCTION HOURS COULD ADVERSELY AFFECT NOISE-SENSITIVE RECEPTORS. IMPACTS WOULD BE SIGNIFICANT BUT MITIGABLE.

Noise from individual construction projects carried out under the 2040 General Plan would temporarily increase ambient noise levels on and adjacent to individual construction sites, including noise from construction traffic. Since there are no specific plans or time scales for individual development projects that would be carried out under the proposed project, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects. However, sites adjacent to areas where more future development/redevelopment is anticipated to occur would be exposed to the highest levels of construction noise for the longest duration. The redesignation of the commercial corridor along Old Redwood Highway to a Boulevard Mixed-Use land use designation, from Highway 101 to Windsor Plains Drive and from north of Starr Road to south of Arata Lane, would facilitate considerable construction activity over the life of the proposed General Plan (the next 22 years). New development in this arterial corridor could include construction of mixed-use, high-density development.

Construction activities, including traffic, demolition, and reconstruction, would generate noise. Table 24 illustrates typical noise levels associated with construction equipment. At a distance of 50 feet from the construction site, noise levels similar to those shown in Table 24 would be expected to occur with individual development projects. Noise would typically drop off at a rate of about 6 dBA

per doubling of distance; therefore, noise levels would be about 6 dBA lower than shown in the table at 100 feet from the noise source and 12 dBA lower at a distance of 200 feet from the noise source. It is assumed that construction in Windsor would not involve the operation of pile drivers, which are sometimes used in construction of multi-story buildings with pile foundations.

Table 24 Typical Noise Levels for Construction Equipment

	Estimated Noise Levels at Nearest Sensitive Receptors (dBA Leq)		
Equipment	**50 feet**	**100 feet**	**200 feet**
Air Compressor	81	75	69
Backhoe	80	74	68
Concrete Mixer	85	79	73
Dozer	85	79	73
Grader	85	79	73
Jackhammer	88	82	76
Paver	89	83	77
Saw	76	70	64
Scraper	89	83	77
Truck	88	82	76

Source: FTA 2006.

As shown in Table 24, noise levels from construction activity could approach 90 dBA Leq at adjacent land uses located approximately 50 feet away. Construction noise would exceed ambient noise levels and may temporarily disturb people at neighboring properties.

Section 7-1-190 of the Code of the Town of Windsor would restrict the timing of construction activities authorized by a Town permit to the hours of 7 a.m. to 7 p.m. Monday through Friday and 8 a.m. to 7 p.m. on Saturday. Implementation of and adherence to the following policy in the 2040 General Plan would ensure continued application of the Town's existing timing restrictions on construction activity:

Public Health and Safety Policies

> **Policy PHS-8.10 *Construction Site Noise Restrictions***. The Town shall restrict construction working hours as designated in the Municipal Code, Title VII Building and Housing Section, to allow efficient construction mobilization and activities, while also protecting the noise environment of noise sensitive land uses.

The temporary nature of construction noise and the Town's restrictions on the timing of construction activities to daytime hours on Monday through Saturday would reduce noise impacts at nearby noise-sensitive receptors. Nevertheless, construction could result in temporary high daytime noise levels that disturb residents and workers. Therefore, the impact of construction noise from development facilitated by the 2040 General Plan would be potentially significant.

Mitigation Measures

Mitigation Measure N-1 would be required to reduce construction noise during working construction hours to the extent feasible.

N-1 Construction Noise Control Measures

~~The following policy shall be added to the Public Health and Safety Element under Goal PHS-8, Noise:~~

~~**Policy PHS-8.18** ***Construction Noise Control Measures.***~~ The following noise control measures shall be included as standard conditions of approval for projects involving construction:

1. Properly muffle and maintain all construction equipment powered by internal combustion engines.
2. Prohibit unnecessary idling of combustion engines.
3. Locate all stationary noise-generating construction equipment such as air compressors as far as practical from existing nearby residences and other noise-sensitive land uses. Such equipment shall also be acoustically shielded.
4. Select quiet construction equipment, particularly air compressors, whenever possible. Fit motorized equipment with proper mufflers in good working order.
5. Residences adjacent to project sites shall be notified in advance by writing of the proposed construction schedule before construction activities commence.
6. The project applicant shall designate a "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint (e.g., starting too early, bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator shall be posted at the construction site.

Significance After Mitigation

Construction noise generated by buildout of the 2040 General Plan would be less than significant with implementation of standard measures in Mitigation Measure N-1 to reduce noise from construction activity.

Threshold:	Expose persons to or generate excessive groundborne vibration or groundborne noise.

IMPACT N-2 CONSTRUCTION OF INDIVIDUAL PROJECTS FACILITATED BY THE 2040 GENERAL PLAN COULD TEMPORARILY GENERATE GROUNDBORNE VIBRATION, POTENTIALLY AFFECTING ADJACENT SENSITIVE LAND USES. ALTHOUGH THE CODE OF THE TOWN OF WINDSOR'S TIMING RESTRICTIONS ON CONSTRUCTION ACTIVITY WOULD LIMIT VIBRATION DISTURBANCE, HIGH VIBRATION LEVELS DURING WORKING CONSTRUCTION HOURS COULD POTENTIALLY DISTURB PEOPLE OR DAMAGE FRAGILE BUILDINGS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION TO APPLY STANDARD VIBRATION CONTROL MEASURES AND TO NOTIFY NEIGHBORS OF CONSTRUCTION ACTIVITY.

Construction individual projects facilitated by the 2040 General Plan could intermittently generate strong vibration on and adjacent to construction sites. Typical construction equipment that produce vibration include vibratory rollers for paving, caisson drills, bulldozers, loaded trucks, and

jackhammers. Table 25 shows estimated vibration levels from the use of typical construction equipment, based on reference levels provided by the FTA at a distance of 25 feet from the source.

Table 25 Vibration Levels for Typical Construction Equipment

	Estimated VdB at Nearest Sensitive Receptors			
Equipment	**25 Feet**	**50 Feet**	**100 Feet**	**200 Feet**
Caisson Drilling	87	80	74	67
Jackhammer	79	72	66	59
Large Bulldozer	87	80	74	67
Loaded Trucks	86	79	73	66
Small Bulldozer	58	51	45	38
Vibratory Roller	94	87	81	74

Sources: FTA 2006.

Based on Table 25, noise-sensitive receptors could experience the strongest vibration during the use of vibratory rollers, caisson drills, and large bulldozers are neighboring construction sites. Vibration levels from vibratory rollers could approach 94 VdB at a distance of 25 feet from the source and 87 VdB at 50 feet.

Compliance with Section 7-1-190 of the Code of the Town of Windsor would restrict the timing of construction activities authorized by a Town permit to the hours of 7 a.m. to 7 p.m. Monday through Friday and 8 a.m. to 7 p.m. on Saturday. This requirement for new development would protect residents from exposure to vibration during normal sleeping hours. Therefore, vibration would not exceed the FTA's thresholds of 72 VdB for residences and buildings where people normally sleep. However, vibration levels during daytime construction activity could potentially exceed the FTA threshold of 75 VdB for institutional land uses like schools, churches, or offices with primary daytime use. The use of vibratory rollers also could generate vibration levels that equal or exceed the FTA's thresholds of 90 VdB for buildings extremely susceptible to vibration damage and 94 VdB for non-engineered timber and masonry buildings. Therefore, impacts related to vibration would be potentially significant.

Mitigation Measures

Mitigation Measure N-2 would be required to reduce construction-related vibration to the extent feasible.

N-2 Construction Vibration Control Measures

~~The following policy shall be added to the Public Health and Safety Element under Goal PHS-8, Noise:~~

> ~~**Policy PHS-8.19** ***Construction Vibration Control Measures.***~~ The following measures to minimize exposure to construction vibration shall be included as standard conditions of approval for applicable projects involving construction:
>
> 1 Avoid the use of vibratory rollers within 50 feet of fragile buildings, which are buildings that are susceptible to damage from vibration.

2 Schedule construction activities with the highest potential to produce vibration to hours with the least potential to affect nearby institutional, educational, and office uses that the Federal Transit Administration identifies as sensitive to daytime vibration (FTA 2006).

3 Notify neighbors of scheduled construction activities that would generate vibration.

Significance After Mitigation

The avoidance of vibratory rollers in close proximity to fragile buildings would prevent potential structural damage from vibration. In addition, the appropriate scheduling of construction activities and notification of neighbors would minimize disturbance of people from vibration-generating equipment. Compliance with the vibration control and notification measures in Mitigation Measure N-2 would reduce impacts to a less than significant level.

Threshold:	Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

IMPACT N-3 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT COULD INCREMENTALLY INCREASE TRAFFIC AND ASSOCIATED NOISE LEVELS ALONG TOWN ROADWAYS AND HIGHWAY 101. WITH THE FUTURE EXTENSION OF THE SMART PASSENGER RAIL LINE THROUGH WINDSOR, TRAIN NOISE ALSO WOULD INCREASE IN THE PLAN AREA. NOISE-SENSITIVE LAND USES LOCATED NEAR MAJOR ROADWAYS AND RAIL LINES WOULD BE EXPOSED TO INCREMENTALLY GREATER NOISE LEVELS. HOWEVER, IMPLEMENTATION OF POLICIES IN THE 2040 GENERAL PLAN WOULD REDUCE IMPACTS TO A LESS THAN SIGNIFICANT LEVEL.

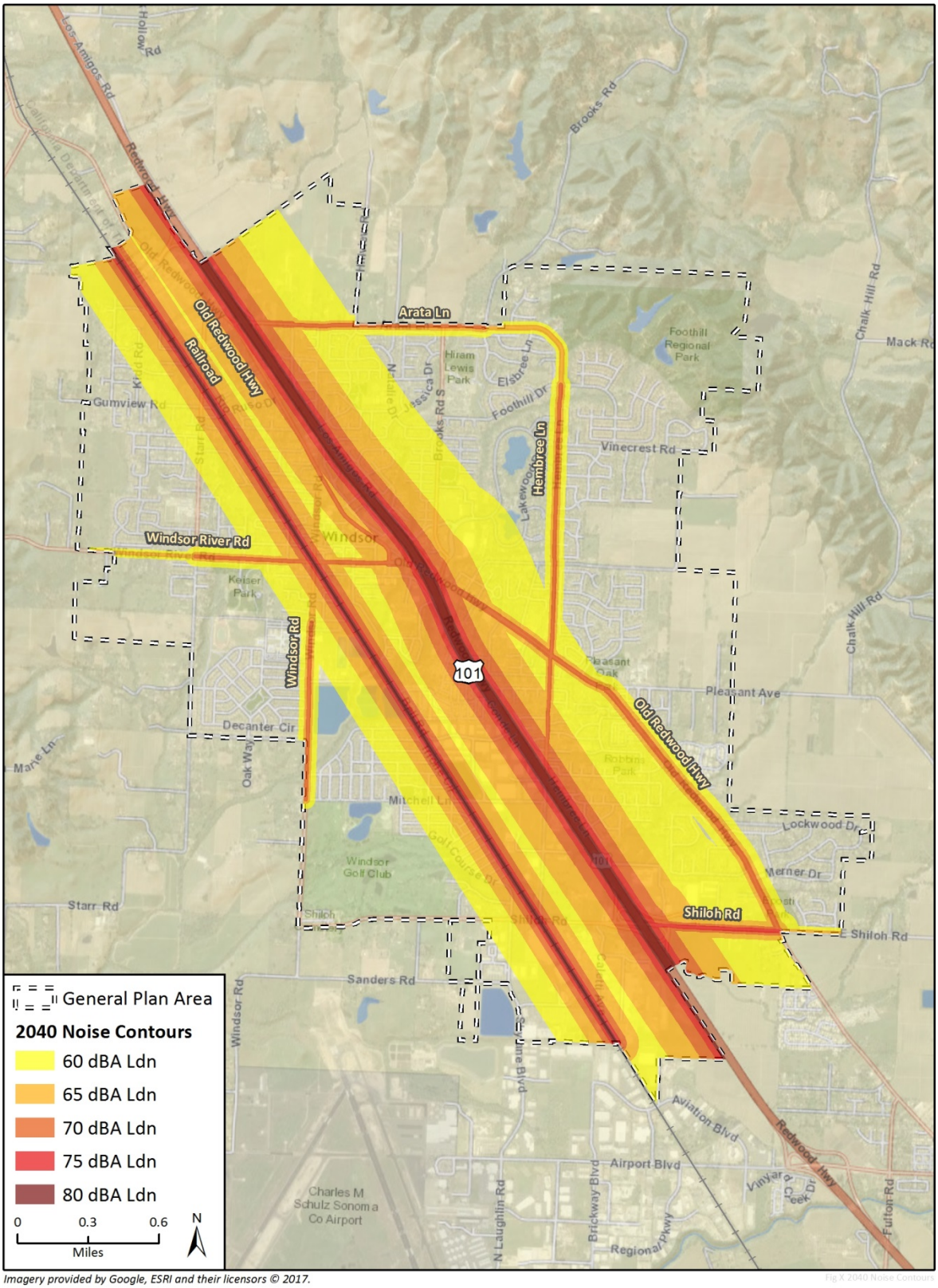
The 2040 General Plan would redesignate existing land uses to promote infill and gateway development, leading to a growth in vehicle trips on roadways. Anticipated 2040 noise contours are shown on Figure 17. It is anticipated that full buildout of the 2040 General Plan, over a period of 22 years, would add up to 2,241 new single-family residences, 1,669 multi-family housing units, and 1.6 million square feet of non-residential uses. By generating new vehicle trips, new development would incrementally increase the exposure of land uses along roadways to traffic noise.

In addition to traffic noise, land uses near the existing rail line in Windsor would be subject to increased train noise upon buildout of the SMART commuter rail system. As discussed in the Setting, northward extensions of the SMART line to Windsor, Healdsburg, and Cloverdale are planned. It is anticipated that the SMART system will be fully built out by 2025. The Town's Station Area/Downtown Specific Plan, adopted in 2012, would promote transit-oriented development in a half-mile radius around the transit station. New noise-sensitive development in this area would be exposed to increases in rail noise, especially from the blowing of train horns.

The increases in roadway and rail traffic would lead to a slight expansion of the existing noise contours shown in Figure 17 outward from major roadways and rail lines. As with the Town's existing noise contours, the highest estimated ambient noise levels would remain greater than 80 dBA Ldn at Highway 101 and the railroad tracks, 70 dBA Ldn at Old Redwood Highway and Shiloh Road, and 65 dBA Ldn at Windsor Road, Windsor River Road east of Starr Road, Hembree Lane, and Arata Lane. These noise levels are conservative because they do not account for local factors that reduce exposure to ambient noise: intervening structures and topography between noise sources and receptors. Increases in ambient noise would have the greatest effect on noise-sensitive uses, such as residences and schools.

The 2040 General Plan includes the following policies intended to reduce exposure to traffic and rail noise.

Figure 17 2040 Noise Contours



Public Health and Safety Policies

PHS-8.1 ***Ambient Sound Levels for New Development***. The Town shall encourage new development to maintain the current ambient sound environment as much as possible. All noise sources that cause the ambient sound levels to rise by more than 5 dBA should be required to incorporate conditions or design modifications to reduce the potential increase in the noise environment.

PHS-8.8 ***Caltrans Noise Attenuation Requirements***. The Town should encourage Caltrans to provide sound attenuation devices that are aesthetically pleasing.

PHS-8.9 ***Truck Route Noise Impacts***. The Town shall maintain its designated truck routes to limit the potential noise impacts to sensitive land uses.

PHS-8.11 ***SMART Quiet Zones***. The Town shall encourage the designation of "quiet zones" along the SMART commuter rail corridor adjacent to land uses that are sensitive.

Implementation of Policies PHS-8.8 and PHS-8.9 would encourage the attenuation of highway noise through installation of sound barriers and would restrict the geographic extent of the loudest truck noise by maintaining designated truck routes. Implementation of Policy PHS-8.1 also would encourage new projects to minimize increases in existing ambient noise levels. In addition, implementation of the new Policy PHS-8.11 would encourage the designation of quiet zones to restrict the sounding of train horns except in emergency situations. This measure, if implemented by the Town and adhered to by SMART operators, would substantially reduce the exposure to train noise of noise-sensitive land uses located near at-grade crossings.

As shown by Figure 16 and Figure 17, it is expected that the Plan Area would be exposed to incremental increases in traffic noise along major roadways and rail noise along the SMART route. Implementation of the above policies would reduce these incremental increases in roadway and rail noise to the extent feasible. Therefore, increases in roadway and rail noise would be less than significant.

Mitigation Measures

No mitigation is needed.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold:	Expose persons to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies.
Threshold:	Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

IMPACT N-4 NEW DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN WOULD INTRODUCE NEW ON-SITE NOISE SOURCES ASSOCIATED WITH RESIDENTIAL, COMMERCIAL, AND INDUSTRIAL LAND USES. THE CONTINUED REGULATION OF ON-SITE NOISE, CONSISTENT WITH THE TOWN OF WINDSOR ZONING ORDINANCE, WOULD MINIMIZE DISTURBANCE TO ADJOINING USES. THEREFORE, THE PROJECT WOULD HAVE A LESS THAN SIGNIFICANT IMPACT RELATED TO ON-SITE OPERATIONAL NOISE.

Full buildout of the 2040 General Plan over a period of 22 years would add up to an estimated 2,241 new single family residences, 1,669 multi-family housing units, and 1.6 million square feet of non-

residential uses to Windsor. This new development would introduce on-site activities that generate noise. Typical noise sources at new residential and mixed-use development would include rooftop ventilation and heating systems, and delivery and hauling systems. New development in redesignated industrial areas could introduce noise associated with loading activity and industrial equipment. Noise generated by on-site activities at new development would be subject to the Town's maximum allowable exterior and interior noise levels at receiving land uses, as shown in Table 22, pursuant to Chapter 27.20, Table 3-1, in the Town of Windsor Zoning Ordinance.

Policy language in the 2040 General Plan would ensure continued application of local standards for on-site noise.

Public Health and Safety Policies

PHS-8.7 *Non-Vehicular Noise*. The Town shall continue to regulate non-vehicular noise sources that are not preempted by State and Federal regulations, to minimize disturbances to adjoining uses through the noise ordinance.

The continued regulation of on-site noise, consistent with the Town of Windsor Zoning Ordinance, would minimize disturbance to adjoining uses. Therefore, on-site operational noise at new development facilitated by the 2040 General Plan would have a less than significant impact.

Mitigation Measures

No mitigation is needed.

Significance After Mitigation

This impact would be less than significant without mitigation.

Threshold:	Expose persons to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies.

IMPACT N-5 THE 2040 GENERAL PLAN WOULD FACILITATE NEW DEVELOPMENT INCLUDING FUTURE RESIDENCES AND OTHER NOISE-SENSITIVE LAND USES THAT WOULD BE EXPOSED TO NOISE LEVELS EXCEEDING THE "NORMALLY ACCEPTABLE" RANGE. HOWEVER, IMPLEMENTATION OF POLICIES IN THE 2040 GENERAL PLAN WOULD REDUCE IMPACTS TO A LESS THAN SIGNIFICANT LEVEL.

The 2040 General Plan would facilitate the development of new residential and other noise-sensitive land uses that could be exposed to ambient noise exceeding normally acceptable ranges. Table 26 shows the 2040 General Plan's normally acceptable exposure levels for new development, which are modified from the existing ranges shown in Table 21.

Table 26 Acceptable Exposure Levels for Community Noise Environments

Land Use Category	Community Noise Exposure (Ldn or CNEL, dBA)			
	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Residential – Low Density Single Family, Duplex, Mobile Homes	50-55	55-70	70-75	75-85
Residential – Multifamily	50-60	60-70	70-75	75-85
Transient Lodging – Motels, Hotels	50-60	60-70	70-80	80-85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50-60	60-70	70-80	80-85
Auditorium, Concert Halls, Amphitheaters	NA	50-65	NA	65-85
Sports Arenas, Outdoor Spectator Sports	NA	50-70	NA	70-85
Playgrounds, Neighborhood Parks	50-70	NA	70-80	80-85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50-70	NA	70-85	NA
Office Buildings, Business Commercial and Professional	50-65	65-75	75-85	NA
Industrial, Manufacturing, Utilities, Agriculture	50-70	70-75	75-85	NA

Land Use Acceptability Interpretation/Conditions:

1. Normally Acceptable: Specified land use is satisfactory based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

2. Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems, will normally suffice.

3. Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

4. Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: Town of Windsor 2040 General Plan, Public Health and Safety Chapter, 2016

New noise-sensitive uses would include residential development, especially in proposed mixed-use areas along Old Redwood Highway. As shown in Figure 17, predicted noise contours on this arterial corridor in the year 2040 would range from 60 to at least 70 dBA Ldn. Noise levels also could exceed 80 dBA Ldn at Highway 101 and the railroad tracks, 70 dBA Ldn at Shiloh Road, and 65 dBA Ldn at Windsor Road, Windsor River Road east of Starr Road, Hembree Lane, and Arata Lane. New multi-family residential development would be conditionally acceptable where ambient noise ranges from 60 to 70 dBA Ldn, as would new office and commercial development exposed to 65 to 75 dBA Ldn. In conditionally acceptable areas, the Town would require a detailed analysis of noise reduction requirements and inclusion of needed noise insulation features in the design. New multi-family residences in normally unacceptable areas (70-75 dBA Ldn) also would be subject to these existing standards.

The 2040 General Plan would include a variety of policies intended to minimize the exposure of new development to ambient noise:

Public Health and Safety Policies

PHS-8.2 ***Exterior Noise Standards for New Development***. The Town shall require new development to meet exterior noise level standards as established in the noise and land use compatibility guidelines contained in Figure PHS- 6.[5] For residential areas, these exterior noise guidelines apply to the primary usable outdoor area.

PHS-8.3 ***Interior Noise Threshold for New Residential***. The Town shall require new residential projects to provide for an interior CNEL of 45 dB or less due to exterior noise sources. To accomplish this, all residential and other noise sensitive land uses within the 60 dB contours or greater as defined in (Figure PHS-5) should be reviewed to ensure that adequate noise attenuation has been incorporated into the design of the project.

PHS-8.5 ***Noise Attenuation Techniques***. The Town shall encourage new development to identify alternatives to the use of sound walls to attenuate noise impacts. Other techniques that would be viewed more favorably by the Town include:

a. Modifications to site planning such as incorporating setbacks; and

b. Revisions to the architectural layout such as changing building orientation, providing noise attenuation for portions of outdoor yards, and construction modification (e.g., noise attenuating windows). In the event that sound walls are the only practicable alternative, such walls shall be subject to development review to ensure that they are designed to be as aesthetically pleasing as possible, incorporating landscaping, variations in color and patterns, and/or changes in texture or building materials.

PHS-8.6 ***Acoustical Reports***. The Town shall require that applications for development of residential or other noise-sensitive land uses in projected noise-impacted areas (greater than 55 dB CNEL) shall require an acoustical analysis, prepared at the applicant's expense. Recommendations contained in the acoustical reports shall be incorporated as conditions of any approval.

PHS-8.8 ***Caltrans Noise Attenuation Requirements*****.** The Town should encourage Caltrans to provide sound attenuation devices that are aesthetically pleasing.

PHS-8.11 ***SMART Quiet Zones*****.** The Town shall encourage the designation of "quiet zones" along the SMART commuter rail corridor adjacent to land uses that are sensitive. (New Policy, Town Staff, and Consultants)

PHS-8.16 ***Applicable Standards in the Building Code*****.** The Town shall continue to incorporate the most recent noise standards contained in Title 24 of the California Code of Regulations in Uniform Building Code into its own building code.

PHS-8.17 ***Project and Environmental Review for Noise*****.** The Town shall consider as part of its discretionary review of proposed new development the potential for a proposed project to either generate significant new noise sources or be significantly impacted by existing noise sources as shown in Figure PHS-5. If the Town determines there may be a potential for significant noise effects related to a proposed new development, the Town shall require an acoustical study be conducted by a qualified acoustician and include appropriate mitigation measures for the proposed development based on that study.

[5] Figure PHS-6 in the 2040 General Plan is shown as Table 26 in this section.

With implementation of Policies PHS-8.2 and PHS-8.3, the Town would subject new development to its proposed ambient noise standards shown in Table 26 and new residential development to an interior noise standard of 45 dBA CNEL. This interior noise standard would reiterate the State's existing Title 24 standard of 45 dBA CNEL for habitable rooms in new buildings. Application of Policy PHS-8.16 would ensure that under the 22-year horizon of the 2040 General Plan, new development continues to be subject to the State's most recent Title 24 noise standards as they are updated. Implementation of Policy PHS-8.6 would require applicants for new noise-sensitive development in areas with ambient noise exceeding 55 dBA CNEL (roughly equivalent to Ldn) to undergo an acoustical analysis and apply any recommendations as conditions of approval. As discussed in Impact N-3, implementation of Policy PHS-8.11 would encourage the designation of quiet zones to restrict the sounding of train horns, reducing exposure to train noise.

New development near the existing rail lines in Windsor could also be subject to groundborne vibration from trains, especially after buildout of the SMART commuter rail system. Commuter rail typically generates vibration levels of approximately 75 VdB at a distance of 50 feet from the source (FTA 2006). The threshold for residential annoyance caused by infrequent vibration events, such as commuter rail passbys, is approximately 80 VdB. SMART commuter trains would operate with diesel locomotives, which generate average vibration levels about 5 to 10 VdB higher than rail transit vehicles (SMART 2017). Therefore, commuter rail vibration could reach 85 VdB at a distance of 50 feet (FTA 2006). Although vibration generated by trains could exceed levels that would annoy nearby residents, this would be an effect of the environment on new development facilitated by the 2040 General Plan. As discussed under Methodology and Significance Thresholds, analysis of impacts of the environment on a project is not required for CEQA compliance. However, this analysis of vibration exposure is provided for informational purposes.

While new development facilitated by the 2040 General Plan would be exposed to ambient noise, implementation of the above 2040 General Plan policies would ensure that it includes design features as needed to meet the Town's applicable exterior and interior noise standards. Therefore, development facilitated by the 2040 General Plan would not be exposed to noise and vibration in excess of local or State standards.

Mitigation Measures

No mitigation is needed.

Significance After Mitigation

This impact would be less than significant without mitigation.

4.12 Population and Housing

This section evaluates the potential population growth and displacement impacts associated with implementation of the 2040 General Plan.

4.12.1 Setting

Population, housing, and employment data are available on a city/town, county, regional, and state level. This EIR uses data collected and provided at the town and county level in an effort to focus the analysis specifically on the Town of Windsor.

Population

As shown in Table 27, the Town of Windsor's estimated 2017 population is 27,371 people (DOF 2017). Table 27 also shows population growth in the Town since census year 2000. Since its incorporation in 1992, the Town of Windsor has expanded at a more rapid growth rate than Sonoma County. The Town's population increased by 20.3 percent between 2000 and 2017 compared to a 10.1 percent population increase in the County over the same period of time. Based on DOF data, the Town's population increased from 2000 to 2010, then decreased from 2010 to 2011, and then increased again from 2011 to 2017. Since 2008, the Town's rate of growth has decreased significantly. Between 2000 and 2008, population grew approximately two percent on average, whereas between 2008 and 2017, the Town has experienced a 0.58 percent population growth rate. The Town's 2017 population of 27,371 people represents approximately 5.4 percent of Sonoma County's total population of 505,120 people. Windsor is the fourth most populated city (town) of the nine cities in Sonoma County.

Table 27 Population in the Town of Windsor (2000 – 2017)

Year	Population	Percent Change from Previous Year
2000	22,744*	–
2001	23,498	3.3
2002	24,048	2.3
2003	24,327	1.2
2004	24,760	1.8
2005	25,212	1.8
2006	25,710	2.0
2007	26,121	1.6
2008	26,325	0.8
2009	26,565	0.9
2010	26,801*	0.9
2011	26,790	<-0.1
2012	26,849	0.2
2013	26,866	<0.1
2014	27,004	0.5
2015	27,169	0.6
2016	27,269	0.4
2017	27,371	0.4

*Revised decennial census counts.

Source: DOF, Report E-8, Population Estimates for California Counties and Cities: January 1, 2000 through January 1, 2010. DOF, E-5 Population and Housing Estimates, for Cities, Counties, and the State, 2011-2017, with 2010 Census Benchmark

Housing

A household is defined as a group of people who occupy a housing unit (U.S. Census Bureau 2015). A household differs from a dwelling unit because the number of dwelling units includes both occupied and vacant dwelling units. Not all of the population lives in households. A portion lives in group quarters, such as board and care facilities while others are homeless.

Household Size

Small households (one to two persons per household [pph]) traditionally reside in units with zero to two bedrooms; family households (three to four pph) normally reside in units with three to four bedrooms. Large households (five or more pph) typically reside in units with four or more bedrooms. However, the number of units in relation to the household size may also reflect preference and economics. Many small households obtain larger units and some large households live in small units for economic reasons.

Table 28 compares the size of households in the Town of Windsor and Sonoma County in 2000, 2010, and 2017. As shown therein, the average household size in Windsor increased slightly from 2.99 pph in 2000 to 3.02 pph in 2017. The average household size in the County decreased from 2.60 pph in 2000 to 2.55 pph in 2010 and then increased slightly to 2.58 pph and 2017. Overall, the Town has maintained a higher average household size than the County over the last 17 years.

Table 28 Households in Windsor and Sonoma County

Average Household Size	2000	2010	2017
Town of Windsor	2.99	2.98	3.02
Sonoma County	2.60	2.55	2.58

Source: DOF, Report E-8, Population Estimates for California Counties and Cities: January 1, 2000 through January 1, 2010. DOF, E-5 Population and Housing Estimates, for Cities, Counties, and the State, 2011-2017, with 2010 Census Benchmark

Housing Units

Table 29 shows the growth in number of housing units in Windsor since 2000. Between 2000 and 2010, approximately 1,821 housing units were added to the Town's housing inventory, an average yearly increase in the housing stock of approximately 182 housing units. Between 2010 and 2017, approximately 111 housing units were added to the Town's housing inventory, an average yearly increase of approximately 16 units, reflecting a decrease in housing unit growth in the Town in the latter half of the last decade following the economic downturn. Of the 9,660 housing units in the Town in 2017, approximately 615 units (6.4 percent) were vacant.

Table 29 Housing Units in Windsor Defined by Units Per Structure

Year	Single Family (Attached Plus Detached)	Multifamily (2 to 4 units)	Multifamily (5+ units)	Mobile Homes	Total Units	Occupied Units
2000	6,394	–	512*	822	7,728	7,589
2010	8,130	165	619	635	9,549	8,970
2017	8,167	175	684	634	9,660	9,045

Source: DOF, Report E-8, Population Estimates for California Counties and Cities: January 1, 2000 through January 1, 2010. DOF, E-5 Population and Housing Estimates, for Cities, Counties, and the State, 2011-2017, with 2010 Census Benchmark
*Total number of multifamily housing units which includes structures with 2 or more housing units.

Employment-Housing Ratio

The employment-household ratio in a jurisdiction is an overall indicator of jobs availability within the area. A balance of jobs and housing is considered beneficial as it has the potential to provide residents an opportunity to work locally and avoid employment commutes to other places in the region. As shown in Table 30, the current (2017) employment in Windsor is estimated to be 6,436 (Town of Windsor 2015a). Based on this employment estimate and the Town's estimated population, the Town's current jobs-housing ratio is 0.7 jobs per household. This is comparatively less than the County's current jobs-housing ratio of 1.0 job per household. In recent years, the County has maintained a more balanced jobs-housing ratio than the Town of Windsor.

Projections

Table 30 presents 2040 population, housing, and employment projections for the Town of Windsor. The 2040 projections are based on 2017 data provided from the Association of Bay Area Governments (ABAG 2017b). The ABAG projections suggest that the Town's population will grow by approximately 4,378 new residents, 1,140 new housing units, and 2,464 new jobs by 2040 compared to current 2017 levels. This is roughly equivalent to an average annual population growth rate of a half a percent through the year 2040.

Table 30 Windsor Population, Housing, and Employment

Town of Windsor	2017	2040	Change between 2017 to 2040
Population (# of residents)	27,371[a]	31,749[b]	4,378
Housing (# of units)	9,660[a]	10,800	1,140
Employment (# of jobs)	6,436[c]	8,900[b]	2,464

[a] DOF, E-5 Population and Housing Estimates, for Cities, Counties, and the State, 2011-2017, with 2010 Census Benchmark;
[b] Plan Bay Area 2040 Land Use Modeling Report;
[c] Estimated employment based on projections included in Table 2.12, Town of Windsor 2040 General Plan Background Report, 2015

Regulatory Setting

State

State Housing Element Statues

State housing element statutes (Government Code Sections 65580-65589.9) mandate that local governments adequately plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that in order for the private market to adequately address housing needs and demand, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. As a result, State housing policy rests largely upon the effective implementation of local general plans and in particular, housing elements. Additionally, Government Code §65588 dictates that housing elements must be updated at least once every eight years.

Regional

Regional Housing Needs Assessment

California's Housing Element law requires that each county and city develop local housing programs to meet their "fair share" of future housing growth needs for all income groups, as determined by the DOF. The regional councils of government, including ABAG, are then tasked with distributing the State-projected housing growth need for their region among their city and county jurisdictions by income category. This fair share allocation is referred to as the Regional Housing Needs Assessment (RHNA) process. The RHNA represents the minimum number of housing units each community is required to plan for through a combination of: 1) zoning "adequate sites" at suitable densities to provide affordability; and 2) housing programs to support production of below-market rate units. Windsor's allocation from the 2014-2021 RHNA, distributed among the four income categories, is shown in Table 31.

Table 31 Town of Windsor Regional Housing Needs Assessment 2014-2022

Income Group	RHNA Allocation (units)	Percent of Total
Very Low: up to 50 percent of area median income	120	27.3
Low: between 51 and 80 percent of area median income	65	14.8
Moderate: between 81 and 120 percent of area median income	67	15.2
Above Moderate	188	42.7
Total	440	100.0

Source: ABAG Regional Housing Needs Plan (ABAG 2013a)

Association of Bay Area Governments

As discussed in Section 4.10, *Land Use and Planning*, the Town of Windsor is located within the ABAG planning area. ABAG functions as the Metropolitan Planning Organization (MPO) for Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties and the towns and cities therein, and is responsible for implementing the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS; Plan Bay Area). The Plan Bay Area is a long-range integrated transportation and land-use plan for the San Francisco Bay Area through 2040. ABAG projections for planning area consider regional, State, and national economic trends and planning policies. ABAG's 2040 population and housing projections for the Town of Windsor are shown in Table 30.

Sonoma County Transportation Authority

The Sonoma County Transportation Authority (SCTA) serves as the coordinating and advocacy agency for transportation funding for Sonoma County. The SCTA acts as the countywide planning and programming agency for transportation related issues. The SCTA plays a leading role in transportation by securing funds, providing project oversight, and initiating long term planning. To comply with the Metropolitan Transportation Commission (MTC) requirement that local transportation agencies establish transportation plans that can feed into the larger Regional Transportation Plan (RTP), SCTA prepared Moving Forward 2040 — the Comprehensive Transportation Plan in September 2016. The Comprehensive Transportation Plan uses ABAG and MTC as well as well as DOF and California Economic Development Department (EDD) data to forecast future population, housing, and employment in Sonoma County and the cities therein through 2040. As discussed therein, Cloverdale, Santa Rosa, and the Town of Windsor are projected to grow at the fastest rates in the County from 2010 to 2040 each with growth rates between 26 percent and 33 percent over the 30 year period.

Local

Windsor Housing Element

While the Housing Element is one of the seven required elements of the General Plan. The Town adopted the 2015-2023 Housing Element in January 2015 as part of the State's fifth Housing Element planning cycle. The 2040 General Plan Update incorporates the adopted 2015 Housing Element. No substantive changes are being proposed to the Housing Element as part of its incorporation into the 2040 General Plan Update.

The purpose of the Housing Element is to identify and analyze existing and projected housing needs in order to preserve, improve, and develop housing for all economic segments of the community. The Housing Element consists of two parts: the Background Report and the Policy Document. The Background Report identifies the nature and extent of the Town's housing needs while the Policy Document provides the objectives, policies, and implementation programs intended to meet identified needs. Housing Element Goal H-4 and the associated policies are intended to preserve affordable units and prevent displacement in Windsor as follows:

Goal H-4: To preserve the existing supply of affordable housing units.

> **Policy 4.1.** The Town shall strive to preserve the Town's supply of mobile home units as sources of nonsubsidized affordable housing, and work with developers to replace these units as very

low- and low-income homes should any redevelopment of the mobile home parks occur and provide priority placement to displaced residents.

Policy 4.2. The Town shall assist in the preservation of housing units produced through the Inclusionary Housing Program or by affordable housing developers as affordability terms expire.

Growth Control Ordinance

As described in the Housing Element, the Town Council enacted a Growth Control Ordinance in 1997 (last amended in 2017) due to concerns about rapid growth in the area. Under the Growth Control Ordinance, the Town Council annually establishes the number of annual growth control allocations available for new residential units based on maintaining an average annual population growth control rate of approximately 1.5 percent. The ordinance requires preparation of an Annual Report to assess compliance with the targeted 1.5 percent average annual population growth rate as well as the status of pending and entitled residential units. Every five years, the Annual Report will be supplemented with an infrastructure report that includes an assessment of infrastructure conditions and capacities. If necessary, the Town Council has the discretion to adjust the annual number of growth control allocations as needed to maintain the targeted annual average population growth rate based on development conditions and/or the ability to provide services to new residential development. Housing Element Policy 5.4 requires that "[t]he Town shall ensure that the Town's Growth Control Ordinance does not negatively impact the production of housing affordable to lower-income households." Accordingly, the Growth Control Ordinance exempts affordable housing units from the requirements of the ordinance.

4.12.2 Impact Analysis

Methodology and Thresholds of Significance

Population and housing trends in the Town were evaluated by reviewing the most current data available from the U.S. Census Bureau, DOF, the current Windsor General Plan, ABAG Plan Bay Area and Regional Housing Needs Plan. Impacts related to population are generally social or economic in nature. Under CEQA, a social or economic change generally is not considered a significant effect on the environment unless the changes are directly linked to a physical change.

The following thresholds are based on Appendix G to the *State CEQA Guidelines*. For purposes of this EIR, impacts related to population and housing are considered significant if implementation of the 2040 General Plan would:

1. Induce substantial population growth either directly or indirectly
2. Displace substantial number of existing housing, necessitating the construction of replacement housing elsewhere
3. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere

For purposes of this analysis, "substantial" population growth is defined as growth exceeding ABAG, Bay Area Air Quality Management District (BAAQMD), or Northern Sonoma County Air Quality Management District (NSCAQMD) population forecasts for the Town of Windsor. "Substantial" displacement would occur if allowed land uses would displace more residences than would be accommodated through growth accommodated by the project.

Project Impacts and Mitigation Measures

Threshold:	Induce substantial population growth either directly or indirectly.

IMPACT POP-1 FULL BUILDOUT OF THE 2040 GENERAL PLAN WOULD ACCOMMODATE AN ESTIMATED 11,067 NEW RESIDENTS, 3,910 NEW HOUSING UNITS, AND 2,860 NEW JOBS IN THE TOWN. THIS WOULD EXCEED THE ABAG AND SCTA COMPREHENSIVE TRANSPORTATION PLAN FORECASTS. HOWEVER, THE 2040 GENERAL PLAN IS INTENDED TO ACCOMMODATE REGIONAL HOUSING NEEDS AND INCLUDES POLICIES TO MANAGE NEW DEVELOPMENT AND LIMIT GROWTH IN SUCH A WAY TO MINIMIZE ENVIRONMENTAL IMPACTS. THEREFORE, IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The 2040 General Plan would designate land uses and define the type of development that can occur throughout the Town through the planning horizon year of 2040 (over approximately 23 years). As discussed in Section 2, *Project Description,* full buildout of the proposed 2040 General Plan could accommodate an estimated 11,067 new residents, 3,910 new dwelling units, and 2,860 new jobs in the Town. Table 32 shows the population and housing with the General Plan compared to ABAG forecasts. As shown, with the estimated growth under the General Plan, the Town of Windsor would have a 2040 population of 38,028, 13,544 housing units, and 9,060 jobs. This would exceed ABAG growth projections and the anticipated growth rate of 26 percent to 33 percent projected in the SCTA Comprehensive Transportation Plan. However, this growth under the General Plan would result in a jobs-housing ratio of 0.7 jobs per household in 2040 which is equivalent to the current (2017) jobs-housing ratio in the Town. In addition, ABAG 2040 projections are based on growth within the Town limits, while the General Plan buildout projections incorporate growth in the General Plan Area, which includes buildout outside of the Town limits but within the UGB including areas such as north of Arata Lane and east of Jensen Lane. Therefore, ABAG growth projections are under growth projections for the 2040 General Plan.

Table 32 Projected Population Growth Through 2040

	Current 2017 Conditions	2040 Conditions with General Plan Buildout[1]	Total 2015 -2040 Growth with General Plan	2040 ABAG Projections[2]	2040 SCTA Growth Rate Projections
Population (# residents)	27,371	38,028	11,067 new residents (40 percent)	31,749	26 to 33 percent
Housing (# of dwelling units)	9,660	13,544	3,910 new units (40 percent)	10,800	–
Employment (# of jobs)	6,436	9,060	2,860 new jobs (44 percent)	8,900	–

Sources: see Table 3 and Table 4 in Section 2, *Project Description,* and Table 30

[1]General Plan Area projections based on 2015 baseline

[2]Town limits only, ABAG 2017b

The ABAG and SCTA growth projections are based on the land use assumptions in the 2015 General Plan. Growth anticipated under the 2040 General Plan is intended in part to meet regional housing needs over the long term. Even though the 2040 General Plan does not propose new development, the development capacity allowed by the 2040 General Plan could exceed SCTA and ABAG forecasts. However, the maximum buildout estimate under the proposed 2040 General Plan assumes that all

remaining properties within the Town's Urban Growth Boundary would be newly developed or redeveloped by 2040 (see further explanation in Section 2.6, General Plan Buildout). This is an unlikely scenario due to the requirements and process necessary to carry out development.

Additionally, growth under the 2040 General Plan would maintain the current jobs-housing ratio (0.7) in the Town in 2040. Therefore, such growth would not result in any adverse effects associated with an increased imbalance of jobs and housing in the Town.

Projected buildout under the 2040 General Plan would result in an annual average growth rate of 1.5 percent, which is consistent with the targeted growth rate in the Town's Growth Control Ordinance. Therefore, ~~Furthermore,~~ development in the Town facilitated by the 2040 General Plan would be ~~required to be~~ in compliance with the Town's Growth Control Ordinance. The purpose of the ordinance is "to accommodate growth anticipated under the General Plan, and to manage new development so that it occurs concurrently with necessary public services, facilities, and infrastructure." The Town's Growth Control Ordinance limits residential dwelling unit allocations as a means of managing growth; however, certain residential developments (i.e. single-family lots) are exempt from growth allocations. Additionally, the Ordinance establishes the requirements for a Merit Process for reserving allocations for new residential development and over the timeframe of the 2040 General Plan the Town's population is expected to grow at an average annual rate of 1.4 percent. ~~and considers the status and capacity of infrastructure, the fiscal conditions of the Town, the status of housing production, recommended development incentives, and entitled units in establishing the number of annual growth control allocations for the Town.~~ Therefore, development would be limited to the growth control allocations provided under the Growth Control Ordinance. The following goals and policies of Land Use and Community Design Element of the 2040 General Plan are aimed at reducing the impacts associated with population and housing unit growth in the Town by supporting the Town's Growth Control Ordinance:

Land Use and Community Design Element Goals and Policies

Goal LU-8: Growth Control Ordinance. Allow Windsor to grow at a reasonable pace, given infrastructure capacity and the desire to maintain its small town feel, healthy economy, and healthy community, and achieve greenhouse gas emission reduction goals.

Policy LU-8.1 ***Maintain Growth Control Ordinance*****.** The Town shall maintain a Growth Control Ordinance that establishes a rate of residential growth that is a function of the available capacity in the transportation, water, wastewater, and school systems, and is consistent with the Capital Improvement Program.

Policy LU-8.2 ***Exemptions for Commercial and Industrial Development*****.** Given the desirability of developing the Town's economic base and providing jobs for Windsor's residents, the Town shall continue to exempt commercial and industrial development from the annual growth control allocations.

Policy LU-8.3 ***Exemptions for Affordable Housing*****.** The Town shall continue to provide exemptions for affordable and special needs housing from the annual growth control allocations.

Policy LU-8.4 ***Exemptions for Priority Infill Areas*****.** The Town shall continue to provide exemptions for infill development within Town-designated priority infill areas to facilitate development in these areas.

Policy LU-8.5 *Streamline Merit Process*. The Town shall explore ways to streamline and simplify the Merit process while still ensuring the development review process results in high-quality development that provides amenities for residents and adds value to the community.

Given that the maximum buildout under the 2040 General Plan is unlikely and that development would be required to comply with the Town's Growth Control Ordinance and the goals and policies listed above, from the Land Use and Community and Design Element, no exceedance of the ABAG population forecast or exacerbation of the jobs-housing ratio is anticipated resulting in a less than significant impact associated with the environmental effects of substantial population growth in the Town of Windsor.

Mitigation Measure

Because impacts would be less than significant, mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Displace substantial number of existing housing, necessitating the construction of replacement housing elsewhere or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

IMPACT POP-2 IMPLEMENTATION OF THE 2040 GENERAL PLAN WOULD NOT DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING OR PEOPLE, NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The proposed 2040 General Plan would enable development in Windsor over the next 22 years that could add 3,910 residential units to the Town, primarily to Town-designated priority infill areas within the Urban Growth Boundary. One of the fundamental goals of the 2040 General Plan is to direct future development in such a way as to minimize some of the adverse impacts of growth by emphasizing compatible and interconnected design in already developed areas. Such a pattern would minimize displacement of existing housing and people that could otherwise result in development pressure on the periphery of the Town.

The Land Use and Community Design Element of the proposed 2040 General Plan has been prepared to ensure that new land uses are logically organized by prioritizing infill development over development at the Town's edge, maximizing the use of underutilized parcels within the Town, and minimizing the encroachment into valued open space areas. The proposed 2040 General Plan directs new growth within the Town's Urban Growth Boundary, where existing roads, water, and sewer are in place. The Growth Control Ordinance of the 2040 General Plan would allow the Town to manage new development so that it occurs concurrently with necessary public services, facilities, and infrastructure while encouraging affordable housing. The following goals and policies of Land Use and Community Design Element of the 2040 General Plan are aimed at reducing the impacts associated with displacement of people and/or housing in the Town:

Land Use and Community Design Element Goals and Policies

Goal LU-1: Community Design. Encourage well-designed development that preserves and enhances Windsor's community character.

Policy LU-1.7 *Compatible Design*. The Town shall encourage new residential development within existing neighborhoods to include building designs that provide diversity while maintaining compatibility with the scale, massing, and heights of the existing homes. Criteria for determining compatible development are defined in design standards for the Town or in form-based codes for specific areas.

Goal LU-2: Residential Development. Promote the preservation and development of residential neighborhoods that provide a variety of housing types, densities, and designs that address the diverse needs of Windsor residents of all ages and socio-economic groups.

Policy LU-2.1 *Housing Diversity*. The Town shall support the development of diverse housing types and lot sizes throughout town to accommodate a range of affordability levels and socio-economic and age diversity.

Policy LU-2.2 *Strengthen Neighborhoods*. The Town shall strive to strengthen existing residential neighborhoods and promote livable new neighborhoods as a means of supporting civic pride, social interaction, and Windsor's small town character.

With incorporation of these goals and policies, the 2040 General Plan would result in a net increase in housing availability in the Town, including affordable housing, and would provide housing to accommodate future growth.

Nonetheless, displacement of existing residential units could still occur during redevelopment under the proposed plan. Although no residential development that would be displaced by implementation of the proposed 2040 General Plan has been identified, if any such temporary displacement did occur, the 3,910 new residential units would replace any existing displaced residences. In addition, Housing Element Policy 4.2 promotes the preservation of the Town's existing supply of affordable housing units, and if preservation is not possible and temporary displacement were to occur, compliance with Housing Element Policy 4.1 would ensure that housing placement is prioritized for displaced residents.

Given that the 2040 General Plan includes goals and policies to increase overall housing in the Town and that there are no current plans for displacement of housing, it is not known when or where construction of replacement housing would occur so it cannot be determined what project-specific environmental impacts would result from the construction and operation of replacement housing. As potential residential development or redevelopment projects are identified, additional project specific, environmental analysis, as necessary, would be completed at that time. Impacts associated with buildout of housing associated with the 2040 General Plan are discussed throughout the EIR. Impacts related to displacement of existing residences would be less than significant.

Mitigation Measure

Because impacts would be less than significant, mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.13 Public Services

This section assesses potential impacts to public services, including fire and police protection, public schools, and libraries from the Windsor General Plan (the proposed project). Impacts to water and wastewater infrastructure and solid waste collection and disposal are discussed in Section 4.15, *Utilities and Service Systems*. Impacts to parks and recreation are discussed in Section 4.17, *Effects Found Not to be Significant*.

4.13.1 Setting

Fire

The Windsor Fire Protection District (WFPD) and the Rincon Valley Fire Protection District work together under contract to share fire administration in the Windsor region. It was formed in 2017 to create one management and administrative entity that provides service to both districts. The WFPD serves more than 31,000 people and approximately 30 square miles of area. Of that area, five square miles lie within Windsor's corporate boundary.

The WFPD provides full service emergency service delivery for fire protection, emergency medical response, and hazardous spills in addition to fire prevention and public education services within the incorporated and unincorporated service areas of the Town of Windsor. The fire department also manages an emergency fire center on behalf of the town.

Personnel, Facilities and Equipment

The WFPD employs two captains and two engineers on duty each day at the town's two fire stations (one captain and one engineer at each station). Practice firefighters supplement staffing when possible/necessary (Town of Windsor 2015c).

Figure 13 shows the location of the Town's two fire stations. Fire Station No. 21 is located at 8200 Old Redwood Highway and houses a Type 1 fire engine and a Type 3 wildland fire engine, rescue jaws, and a water tender boat. In 2008 Fire Station No. 23 was constructed at 8600 Windsor Road replacing the old station which was demolished in 2011 and houses a 75-foot quint ladder truck, a Type 1 fire engine and a Type 3 wildland fire engine, and ladder truck. The new fire station increases the ability fire department to keep response times within five minutes which is a goal in the existing General Plan.

Wildland Fire Hazards

Windsor is generally surrounded by undeveloped lands and agricultural operations, which makes the town vulnerable to wildfires. The northeast and southwest corners of the town abut what CAL FIRE designates a moderate wildland fire hazard (Figure 13). However, 34 acres of the Town of Windsor are subject to high, very high, or extreme wildfire threat with 1,362 acres falling within the wildland-urban interface threat areas. Fire hazard severity zones are determined by CAL FIRE to identify areas based on the severity of fire hazard that is expected to prevail there. These areas, known as zones, are based on factors such as fuel (material that can burn), slope and fire weather. There are three zones based on increasing fire hazard - medium, high, and very high. Medium hazard zones are either wildland areas supporting areas of typically low fire frequency and relatively modest fire behavior or are developed/urbanized areas with a very high density of non-burnable

surfaces including roadways, irrigated lawn/parks, and low total vegetation cover (<30%) that is highly fragmented and low in flammability (e.g., irrigated, manicured, managed vegetation).

The town also has two non-contiguous land areas to the southwest, one located at the intersection of Eastside Road and Trenton-Healdsburg Road, and the other at the intersection of Trenton-Healdsburg Road and Mark West Creek. Both locations are almost completely surrounded by moderate fire hazard zones. A majority of the town abuts productive agricultural lands, predominantly vineyards, which have no fire hazard zone associated with them.

Climate Change and Future Fire Potential

The areas within the Town limits are under the Town of Windsor LHMP and areas outside the Town limits and within the General Plan Area are under the Sonoma County LHMP. The Sonoma County Hazard Mitigation Plan identifies climate change as increasing average temperatures and extending the fire season across the Western United States. The county region has been experiencing longer, hotter, and drier summers, which desiccates vegetation; this can result in larger and more intense wildfires that can impact agriculture and cities, particularly affecting the urban areas within the wildland/urban interface. This trend is expected to continue as a result of climate change. In addition, drought conditions in California increase the risk of wildfires for Windsor and surrounding areas.

According to the Town of Windsor LHMP, climate change is expected to result in warmer temperatures, decreases in precipitation, and increases in the frequency and severity of drought conditions. As a result there is likely to be an increase in wildfires in Windsor. The future potential for wildland fires is higher in the wildlands and wildland urban interface outside of the Town Limits. Potential for wildfires is also expected to increase due to climate change with a potential 20 percent increase in burnt areas in the Windsor area by 2085 (Town of Windsor 2017b). This potential increase in fires will strain the fire resources of Windsor due to an increase in the demand for fire protection and intervention services. The current focus to prevent impacts related to wildland fires is in vegetation abetment in order to create defensible space around structures.

Police

The Windsor Police Department is staffed by Sonoma County Sheriff's Office employees under a negotiated contract between the County and the Town of Windsor. This contracting arrangement first started in 1993 with a 10-year extension approved by voters in 2008. This ten-year term expires at the end of 2017. The Department's policing and services programs are divided into four divisions: Police Administration and Support Services; Police Patrol and Traffic Enforcement; Police Investigations; and Community Services.

The Windsor Police Department provides police protection services throughout the town. The Department's police station is located at 9291 Old Redwood Highway and is staffed with 23 full-time employees consisting of 17 sworn deputies (including one school resource officer and one traffic officer), two sergeants, one chief, one administrative assistant, one community-service officer, and one legal processor. Two specialty positions within the Department include a traffic officer and school resource officer. The Town also contracts with Sonoma County Sheriff's Department for a part-time detective's position. Although no individual detective is assigned to the town, Sonoma County Sheriff's detectives and Gang Enforcement deputies are responsible for the investigation of certain complaints and criminal violations. The Windsor Police Department is comprised of 11

marked patrol cars, one unmarked car, one community services SUV, one motorcycle, and two speed trailers.

The Windsor Police Department has 0.74 sworn officers per 1,000 residents after hours. This is somewhat lower than the League of California Cities recommended standard of 1.4 to 1.6 sworn officers per 1,000 residents. However, the Sheriff Department augments the Windsor Police Department for investigative services and after hours patrol. Despite the after-hours low ratio, Windsor had an average response time of five minutes and six seconds in 2012. The standard acceptable response range is 6-8 minutes based on a sampling of similar cities by the League of California Cities.

Police Administration and Support Services

Police Administration provides for the management, coordination, and administration of all law enforcement activities for Windsor. The Police Chief and the administrative aide perform the primary administrative functions, with the Chief having overall management responsibility for the department. The Chief's responsibilities focus on providing optimum services to the town through efficient and effective use of available personnel, facilities, and equipment. The administrative aide provides general office management and clerical support for the Department

Police Patrol and Traffic Enforcement

The patrol program includes a variety of law enforcement activities performed by sworn police officers. Officers perform directed patrolling based on patterns of criminal activity occurring, or anticipated to occur, within specified areas and respond to calls for service and initiate activity, as required. Other law enforcement activities performed by deputies include investigating complaints and criminal violations, arresting and interrogating suspects, and preparing reports.

The police patrol program also allows for initial response to calls for services related to dangerous animal situations or noise disturbances caused by animals; however, the Town of Windsor contracts with Sonoma County Animal Services for general animal control (e.g., barking dog complaints, lost and found, field services).

The full-time traffic enforcement officer enforces the Vehicle Code and traffic related ordinances adopted by the Town of Windsor. The traffic enforcement program also provides for the investigation and documentation of traffic collisions, as well as for apprehension and arrest of persons driving under the influence. The traffic program does not provide for routine parking enforcement.

Police Investigations

Patrol officers perform most investigative services required in connection with misdemeanor and traffic offenses and may initiate investigations in connection with more serious offenses. Trained detectives provide in-depth investigation of suspected or actual criminal activity. Investigators are assigned to cases based upon screening procedures used by the Sonoma County Sheriff's Department, or at the discretion of the Police Chief. Investigative services include: analysis of complaints, thorough investigation of crimes and crime scenes, interrogation of accused persons, proper collection and handling of evidence, and detailed reporting of all findings. The assigned detective monitors the case through the criminal justice system until its conclusion.

Community Services

The Police Department provides various community outreach and crime prevention activities. The Community Services Program is staffed by a Community Services Officer (CSO) whose focus is educating the citizenry in techniques to reduce crime in their neighborhoods and businesses. The program's primary objective is to provide for positive communication between the Department and community members in order to promote trust and support. The CSO also coordinates special activities such as neighborhood watch, drug prevention education, and the crime prevention volunteer program.

The Police Department works closely with the Parks and Recreation Department to support its efforts to maintain the resilience and vitality of our youth by providing them with robust parks and recreation opportunities and a safe environment within which to thrive. This includes joint efforts to monitor and track criminal activities in the parks and facilities including graffiti and vandalism. Other collaborative efforts include police support during community events in Keiser Park and the Town Green as well as the "Every 15 Minutes" program at Windsor High School.

California Highway Patrol

The California Highway Patrol (CHP) provides traffic safety and enforcement services on unincorporated roadways and State highways. The Town of Windsor is located in the CHP Golden Gate Division that operates one of twelve area offices in Rohnert Park, approximately 16.7 miles south of Windsor. The Golden Gate Division also includes three commercial inspection facilities, one Communications Center, and an Air Operations unit and employs 1,250 peace officers and 200 civilians.

Schools

Windsor Unified School District

The town is served by the Windsor Unified School District (WUSD) that oversees eight schools including two charter schools. There is also a private school located in the town. The WUSD employs over 450 people, including over 230 teachers and has a student-teacher ratio of 21 students for every full-time teacher. The District's student population reflects similar demographics to Sonoma County as a whole with 44 percent of the District's students Latino and 47 percent white. English learners comprise 20 percent of the total district population and 41 percent of all students are considered socio-economically disadvantaged. The District's Academic Performance Index (API) is at 776, with 58 percent of students testing proficient in English-Language Arts and 45 percent proficient in mathematics. Four of Windsor's schools are California Distinguished Schools, and the district has earned two California Golden Bell Awards.

Windsor Unified School District primarily has the Oklahoma/Midwest Model grade level configuration. With this model, all students at a grade level attend the same school and students attend multiple schools during their elementary education. This model reinforces the concept that the student body is a "total" community. Thus, students in grades K-1 attend Mattie Washburn Elementary, students in grades 2-3 attend Windsor Creek Elementary and students in grades 4-5 attend Brooks Elementary. The exception to this model is the Cali Calmécac Language Academy and the Home School program offered through Windsor Oaks Academy.

The District also sponsors two additional charter schools. The Village Charter School is a small 75-student K-6 school focused on multicultural education in multiage classrooms and Insight School

North Bay, a technology focused on-line school for 200 students for grades 9-12. Grace Academy is a private Christian school located in Windsor and had 2015-2016 enrollments of 260 students at grades Pre K-12.

Table 33 describes WUSD schools within the General Plan Area, their corresponding grades, student enrollment as of the 2015-2016 school year, and enrollment capacity based on the 2011-2015 WUSD Utilized Facilities Master Plan (October 2010).

Table 33 Plan Area School Enrollment and Capacity

School	Grades	Enrollment 2015-2016[1]	Practical Capacity[2]
Windsor High School	9-12	1,709	1,540
Windsor Oaks Academy	10-12	61 in multiple alternative programs	N/A - no site, standards are not defined for alternative education.
Windsor Middle School	6-8	856	1,000
Cali Calmécac Language Academy	K-8	1,111	<976
Matti Washburn Elementary	K-1	473	576
Brooks Elementary	4-5	455	550
Windsor Creek Elementary	2-3	377	594
Grace Academy (Private)	Pre K-12	260	N/A

[1]The Windsor Times, September 2016

[2]Windsor Unified School District Facilities Master Plan 2011-2015, October 2010

Local Ballot Measure F

During the November 2016 election, a bond issue measure was on the ballot for the Windsor Unified School District. Measure F issues $62 million in bonds to Windsor Unified School District to acquire, construct, and renovate school facilities. The Measure passed with 62 percent approval.

Joint Use Master Agreement

The Windsor Town Council approved the current Joint Use Master Agreement in 2011 which superseded and replaced five of the original six agreements associated with parks and recreation and/or school facilities. The original six agreements were for the collaborative use of separately owned and operated WUSD school facilities and Town parks and recreation facilities with the intent to permit either party to utilize the other's facilities at no charge to either, with limited exceptions. The Joint Use Master Agreement serves as a guide for future joint operations between the two parties and all applicable Town and WUSD facilities that had not previously been included in a formal agreement with appropriate insurance and indemnification.

Public Libraries

The Windsor Regional Library (9291 Old Redwood Highway) is one of 13 branches within the Sonoma County Library system and provides education activities, reading, and writing programs for children and adults. The mission of the Sonoma County Library system is to bring information, ideas, and people together to build a stronger community. They are known nationally for their innovation and locally for their connection to their residents and communities. Their Strategic Plan is broken down into five Components: The Customer Experience, Education and Discovery, Innovation, Community Engagement, and Financial Sustainability (Sonoma County Library Strategic Plan 2015-

2020). During the November 2016 election, 72 percent of the voters in Sonoma County voted to support Sonoma County Library by passing Measures Y to increase sales taxes by an eighth of a cent to maintain, restore, and enhance library services throughout the County.

Regulatory Setting

Fire

Federal Policies

Disaster Mitigation Act (2000-Present)

Section 104 of the Disaster Mitigation Act of 2000 (Public Law 106-390) requires a state mitigation plan as a condition of disaster assistance. There are two different levels of state disaster plans: "Standard" and "Enhanced." States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Act has also established new requirements for local mitigation plans

National Fire Plan (NFP) 2000

The National Fire Plan was developed under Executive Order 11246 in August 2000, following a landmark wildland fire season. Its intent is to actively respond to severe wildland fires and their impacts to communities while ensuring sufficient firefighting capacity for the future. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability.

State Policies

California Fire Plan

The Strategic California Fire Plan is the State's road map for reducing the risk of wildfire. The plan was updated in 2012, and directs each CAL FIRE Unit to prepare a locally specific Fire Management Plan. In compliance with the California Fire Plan, individual CAL FIRE units are required to develop Fire Management Plans for their areas of responsibility. These documents assess the fire situation within each of CAL FIRE's 21 units and six contract counties. The plans include stakeholder contributions and priorities, and identify strategic areas for pre-fire planning and fuel treatment as defined by the people who live and work with the local fire problem. The plans are required to be updated annually.

California State Multi-Hazard Mitigation Plan, draft (updated 2013)

The purpose of the State Multi-Hazard Mitigation Plan (SHMP) is to significantly reduce deaths, injuries, and other losses attributed to natural and human-caused hazards in California. The SHMP provides guidance for hazard mitigation activities emphasizing partnerships among local, state, and federal agencies as well as the private sector. The California Office of Emergency Services (OES) prepares the State of California Multi-Hazard Mitigation Plan (SHMP). The SHMP identifies hazard risks, and includes a vulnerability analysis and a hazard mitigation strategy. The SHMP is Federally required under the Disaster Mitigation Act of 2000 in order for the State to receive federal funding. The Disaster Mitigation Act of 2000 requires a State mitigation plan as a condition of disaster assistance.

Wildland-Urban Interface Building Standards

On September 20, 2007 the Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending the California Code of Regulations, Title 24, Part 2, known as the 2007 California Building Code (CBC). These codes include provisions for ignition-resistant construction standards in the wildland urban interface.

California Fire and Building Code (2016)

The 2016 Fire and Building Code establishes the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare for the hazards of fire, explosion or dangerous conditions in new and existing buildings, structures and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of this code apply to the construction, alteration, movement enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal and demolition of every building or structure or any appurtenances connected or attached to such building structures throughout the State of California.

Government Code 65302.5: General Plan Fire Safety Element Review

This statute requires the State Board of Forestry and Fire Protection to provide recommendations to a local jurisdiction's General Plan fire safety element at the time that the General Plan is amended. While not a direct and binding fire prevention requirement for individuals, General Plans that adopt the Board's recommendations will include goals and policies that provide for contemporary fire prevention standards for the jurisdiction.

Regional and Local Policies

Association of Bay Area Governments (ABAG) Multi-Jurisdictional Local Hazard Mitigation Plan

The Plan covers mitigation measures that should be adopted by participating municipalities across the San Francisco Bay Area. The mitigation measures focus on hazards such as earthquake, fire, flood, and tsunami.

Annex to 2010 Association of Bay Area Governments Local Hazard Mitigation Plan, Town of Windsor.

The hazard mitigation plan outlines mitigation measures that Windsor is required to make to decrease the loss or risk to life and property in case of a hazard (drought, earthquake, fire, flooding). The main fire mitigation measures stem from ABAG's 2005 Multi-jurisdictional Hazard Mitigation Plan related to water supply, vegetation management, and access and transportation. Below is a summary of each section:

- **Water Supply.** Ensure there is adequate water supply and pressure for all new and existing development. Coordinate between the fire jurisdictions and water supply agencies to identify needed improvements in areas with the highest wildfire hazard risk.
- **Vegetation Management.** Adopt a defensible space program that provides guidelines on cutting and thinning vegetation.

- **Access and Transportation.** Ensure that new development follows standards that will allow for the free access and flow of fire personnel and vehicles.

Sonoma County Hazard Mitigation Plan

The Sonoma County Hazard Mitigation Plan identifies measures that the County will take to lower the hazard risk to property and life. Wildfire hazard mitigation features prominently in the plan due to the relatively rural nature of the county and its high fire risk (as identified by CAL FIRE).

Town of Windsor Local Hazard Mitigation Plan

The Town of Windsor LHMP establishes the Town's strategy to reduce the impacts of natural hazards including participation in mutual air agreements for fire protection and working with other reginal agencies to ensure compliance with vegetation management standards for fire safety. The LHMP focuses on mitigating hazards by establishing strategies to prevent future disasters and/or minimize their impacts. Natural hazards that may impact the Town are discussed and assessed in the LHMP to determine the probability of occurrence and social vulnerability for each hazard (Town of Windsor 2017b).

Sonoma-Lake-Napa Unit (LNU) Fire Management Plan

The LNU Fire Management Plan, last updated in 2010, reflects the wildfire situation in the CAL FIRE Unit by identifying high-risk and high-value areas where potential exists for costly and damaging wildfires. The four basic components of the fire plan assessment are assets at risk; vegetation fuel hazards; fire history and frequency of severe fire weather; ignition workload assessment; and management prioritization. The plan also includes strategies for reducing the fire risk in priority areas.

Town of Windsor General Plan 2015

The existing (2015) General Plan identifies policy and actions that the town should take to decrease the fire hazard level, while increasing the level of fire protection within the town and the sphere of influence. Public Health and Safety goals and objectives are geared to minimize risks to lives and properties due to wildland fire hazards and maintain a high level of emergency preparedness to respond to natural or human-caused disasters.

Police

California Commission on Peace Officer Standards and Training (POST)

The California Commission on Peace Officer Standards and Training (POST) advocates for, exchanges information with, sets selection and training standards for, and works with law enforcement and other public and private entities. POST was established by the Legislature in 1959 to identify common needs that are shared by representatives of law enforcement.

Schools

California Code of Regulations

The California Code of Regulations, Title 5 Education Code, governs all aspects of education within the state.

California State Assembly Bill 2926 (AB 2926)—School Facilities Act of 1986. In 1986, AB 2926, entitled the School Facilities Act of 1986, was enacted by the state of California and added to the California Government Code (Section 65995). It authorizes school districts to collect development fees, based on demonstrated need, and generate revenue for school districts for capital acquisitions and improvements. It also established that the maximum fees (adjustable for inflation) which may be collected under this and any other school fee authorization are $1.50 per square foot ($1.50/sf) of residential development and $0.25/sf of commercial and industrial space.

AB 2926 was expanded and revised in 1987 through the passage of AB 1600, which added Section 66000 et seq. of the Government Code. Under this statute, payment of statutory fees by developers serve as total mitigation under CEQA to satisfy the impact of development on school facilities. However, subsequent legislative actions have alternatively expanded and contracted the limits placed on school fees by AB 2926.

California Senate Bill 50 (SB 50)

As part of the further refinement of the legislation enacted under AB 2926, the passage of SB 50 in 1998 defined the Needs Analysis process in Government Code Sections 65995.5–65998. Under the provisions of SB 50, school districts may collect fees to offset the costs associated with increasing school capacity as a result of development. The fees (referred to as Level One fees) are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level Two fees require the developer to provide one-half of the costs of accommodating students in new schools, while the state would provide the other half. Level Three fees require the developer to pay the full cost of accommodating the students in new schools and would be implemented at the time the funds available from Proposition 1A (approved by the voters in 1998) are expended. School districts must demonstrate to the state their long-term facilities needs and costs based on long-term population growth in order to qualify for this source of funding. However, voter approval of Proposition 55 on March 2, 2004, precludes the imposition of the Level Three fees for the foreseeable future. Therefore, once qualified, districts may impose only Level Two fees, as calculated according to SB 50.

4.13.2 Impact Analysis

Methodology and Significance Thresholds

According to Appendix G of the adopted *State CEQA Guidelines*, impacts related to public services from the proposed project would be significant if it would:

1 Result in substantial adverse physical impacts associated with the need for or provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other objectives for:

- Fire protection
- Police protection
- Schools
- Parks
- Other public facilities

As described in Section 4.17, *Effects Found Not to Be Significant,* impacts related to parks were found to be less than significant and are not discussed further in this section.

Project Impacts and Mitigation Measures

Threshold:	Result in substantial adverse physical impacts associated with the provision of new or physically altered police, fire, or other public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other objectives.

IMPACT PS-1 DEVELOPMENT FACILITATED BY THE PROPOSED 2040 GENERAL PLAN WOULD RESULT IN AN INCREASE TO THE TOWN'S POPULATION. THIS WOULD INCREASE DEMAND FOR FIRE, POLICE, AND EMERGENCY MEDICAL SERVICES AND POTENTIALLY CREATE THE NEED FOR NEW POLICE, FIRE, OR OTHER SERVICE FACILITIES. HOWEVER, COMPLIANCE WITH POLICIES IN THE 2040 GENERAL PLAN, AS WELL AS THE TOWN'S MANAGEMENT OF GROWTH, WOULD REDUCE IMPACTS RELATED TO THE CONSTRUCTION OF FIRE, POLICE, AND OTHER SERVICE FACILITIES TO A LESS THAN SIGNIFICANT LEVEL.

A principal philosophy of Windsor, and the 2040 General Plan, is to manage growth to retain the Town's small size and rural atmosphere and respect natural resources. The Town encourages development within the town limits, while supporting land uses that are rural and agricultural beyond the Town's Urban Growth Boundary. The location and timing of new development in Windsor is carefully managed in order to maximize community benefits and minimize the impact of development on existing infrastructure, public services, and the Town's fiscal well-being. The full buildout of the proposed 2040 General Plan could accommodate an estimated 11,067 new residents and 3,910 new dwelling units. This is roughly equivalent to an average annual growth rate of 1.37 percent through the year 2040.

Public Facilities and Services Element Goals and Policies

The 2040 General Plan includes the following goals for public facilities for providing required and needed public facilities and services for the Town of Windsor.

Goal PFS-1: General Public Facilities and Services. Ensure the provision of adequate and efficient facilities and services that maintain service levels, are adequately funded, accessible, reliable, and strategically allocated.

Goal PFS-6: Law Enforcement. Provide high quality public safety services to ensure a safe community for all in Windsor.

Goal PFS-7: Fire Protection and Emergency Services. Provide high quality fire and emergency response to prevent the loss of life, injury, and property.

The purpose of Goal PFS-1 is to maintain the necessary level of service for the overall provision of public facilities and services in Windsor. As described in the 2040 General Plan, "Maintaining necessary levels of service with adequate funding for all facilities is paramount to meet the demands of existing and future residents and businesses." For example, future development anticipated by the 2040 General Plan may result in the need for additional fire services in the North of Arata area, including a new fire station. Several policies serve to meet Goal PFS-1, including *PFS-1.1 Capital Improvement Program*, stating the "Town shall maintain the Capital Improvement Program (CIP)" to ensure the adequate and timely provision of public facility and municipal utility improvements. Policy PFS-1.8: Public Facility Master Plans directs the Town to maintain and

implement public facility master plans to ensure compatibility with current land use policy. Also *PFS-1.9: Public Facility Clustering* to promote the clustering of public and quasi-public facilities (e.g., schools, parks, libraries, child care facilities, community activity centers), and the joint-use of such facilities to reduce the need for construction of separate facilities. *PFS-6.1: Staffing Benchmark* strives to ensure law enforcement operations are expanded as the Town's population increases by establishing benchmark standards and *PFS-7.3 Interagency Coordination,* PFS-7.5 Fire Prevention, and PFS-7.6 Emergency Response Coordination, support cooperation with regional agencies that reduce the need for the Town to provide additional fire protection and emergency response facilities. In addition, *PFS-7.8 Emergency Center Siting* is to ensure critical facilities such as fire, police, and emergency response facilities are not sited in areas subject to ground rupture and severe groundshaking from earthquakes, and flooding during a 100-year storm, reducing potential impacts from construction of new facilities.

Goal PFS-1, through implementation of the aforementioned policies, will reduce impacts from the construction of new facilities to a less than significant level by reducing actual construction of new facilities through clustering of facilities, constructing new facilities in accordance with current land use policies, and following their CIP so that new facilities are only constructed when necessary and timely. In addition the policies discussed above implementing Goals PFS 6 and 7 would ensure the appropriate increase in police staffing commensurate with population growth, the continued police and fire coordination with regional fire and emergency services reducing the need for additional facilities, and proper siting of facilities to reduce risks of impact from earthquakes and flooding. As well, the proposed 2040 General Plan growth rate of 1.37 percent allows for the planned expansion of facilities through the Town's CIP in accordance with the Town's land use plan that identifies areas for Public/Quasi-Public use (2040 General Plan, Figure LU-1).

Mitigation Measures

Because impacts would be less than significant, mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Result in substantial adverse physical impacts associated with the provision of new or physically altered school or library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other objectives.

IMPACT PS-2 DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN WOULD ALLOW FOR AN INCREASE IN THE TOWN'S POPULATION. THIS WOULD INCREASE DEMAND FOR SCHOOLS AND LIBRARIES AND POTENTIALLY CREATE THE NEED FOR NEW SCHOOL OR LIBRARY FACILITIES. HOWEVER, COMPLIANCE WITH GOALS AND POLICIES IN THE 2040 GENERAL PLAN, AS WELL AS THE TOWN'S MANAGEMENT OF GROWTH, WOULD REDUCE IMPACTS RELATED TO THE CONSTRUCTION OF SCHOOL OR LIBRARY FACILITIES TO A LESS THAN SIGNIFICANT LEVEL.

A principal philosophy of Windsor is to manage growth to retain the Town's small size and rural character, which, as explained above, reduces the potential impact from the construction of new schools or libraries to meet a growing population since annual growth will be limited. Goals and policies in Public Facilities and Services Element of the 2040 General Plan support the continued partnership between the Town and the Windsor Unified School District (WUSD) with the

development of new schools for existing and future growth areas, and the replacement of the existing Windsor Regional Library with a facility suited to meet the current and projected demographics and needs of its service area. For example, the 2040 General Plan proposes the potential construction of a new school site with 500 students in the North of Arata Community Place Area to support future growth in northern Windsor.

Goal PFS-10: Education and Libraries. Provide Windsor with distinguished schools, programs, and learning opportunities.

Policies implementing Goal PFS-10 direct the WUSD to coordinate with the Town in proper siting and design of school facilities by providing criteria for WUSD to consider. These criteria are designed to reduce impacts from the siting of new schools and encourage the integration of school facilities with the neighborhoods they are to serve (PFS-10.1-3). Policy PFS-4 (New Library) directs the replacement of the existing Windsor Regional Library adjacent to existing public facilities, parks, schools, and/or the government center as part of the Windsor Civic Center Visioning Plan. The library would be reconstructed as a two story structure at a site north of its current location. Directing construction of the new library as infill development reduces potential impacts from having to extend utilities and public services to greenfield development. As well, the proposed 2040 General Plan growth rate of 1.37 percent allows for the planned expansion of school facilities and coordination with WUSD. The Town's land use plan also identifies areas for school facilities (Public/Quasi-Public) to allow for the integration of schools with the neighborhoods they are to serve (2040 General Plan, Figure LU-1). The adherence to the aforementioned goals and policies will reduce impacts from the construction of new facilities to a less than significant level.

Mitigation Measures

Because impacts would be less than significant, mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.14 Transportation/Traffic

This section evaluates the potential impacts on the local and regional circulation system that would result from implementation of the 2040 General Plan. This includes an analysis of the potential for ~~the proposed General Plan~~ growth that occurs outside of the Urban Growth Boundary to increase local and regional traffic volumes, increase hazards due to a design feature, interfere with emergency access, or conflict with applicable alternative transportation programs.

4.14.1 Setting

There is a natural hierarchy of streets that provide various levels of access and mobility, with freeways (Highway 101) accommodating the highest volumes and speeds, cross-town streets connecting to freeways and operating at moderate speeds and/or volumes, and local streets that link neighborhoods, parks and schools to the cross-town streets and to each other, with many of these serving adjacent development and neighborhoods.

State Highways

Highway 101 is the primary route connecting the Town of Windsor to Santa Rosa and the San Francisco Bay Area to the south, and Healdsburg and Mendocino County to the north. Within Windsor, Highway 101 is a four-to six-lane freeway with full interchanges at Shiloh Road and Downtown, and a partial interchange with ramps to and from the south and from the north at Arata Lane. Existing traffic on the freeway within Windsor averages 94,000 vehicles per day.

Regional Arterials

Old Redwood Highway is designated as a Rural Principal Arterial by the County of Sonoma in the *Sonoma County General Plan 2020*. The corridor connects the southern portion of the City of Healdsburg to Santa Rosa via the Town of Windsor. Outside of Windsor the highway operates as a two-lane rural highway, passing primarily through rural residential and agricultural uses. At the southern boundary of the Town of Windsor, the road carries approximately 12,000 vehicles per day, while the volume is only 4,800 vehicles per day at the northern boundary. Within town limits, Old Redwood Highway is designated a Crosstown Street (see description in next section) for purposes of Complete Streets design.

Windsor Crosstown Streets

The street system as it currently exists reflects changes that have occurred over the last decade as the Town has been transitioning from auto-centric policies to those that better support all modes and users. As part of this effort, in January 2013 the Town adopted its *Complete Street Design Guidelines* that reallocate public space along public streets to better serve all modes and provide streets with physical designs that reflect consideration of the surrounding land use context and anticipated traffic characteristics.

Arata Lane connects the northeasterly part of Windsor to Highway 101 at the three-quarter interchange; the remaining on-ramp to northbound Highway 101 is planned to be constructed in the future. Currently Arata Lane has one lane in each direction except near the interchange, as well as bike lanes in both directions. The volume of traffic using Arata Lane is approximately 3,100 vehicles per day.

Bell Road is a two-lane road that connects to Windsor River Road on the north and Conde Lane on the southeast. Though currently discontinuous, the missing section will be constructed as part of future development, providing an alternative route to serve the Downtown area.

Brooks Road South varies from two, to three, to five lanes along its course from Arata Lane to Lakewood Drive, connecting retail development on the east side of Highway 101 to surrounding residential neighborhoods.

Conde Lane extends between Old Redwood Highway on the north end to Shiloh Road on the south end, serving adjacent commercial and industrial properties as well as nearby residential neighborhoods.

Hembree Lane connects the easterly end of Arata Lane to Shiloh Road, serving residential neighborhoods on its north end and a shopping center at the south end that attracts regional trips.

Lakewood Drive serves as the north leg of the intersection at the Highway 101 northbound off-ramp to Old Redwood Highway (the Downtown interchange), then continues north to serve adjacent retail and commercial land uses, terminating in a gated residential community.

Los Amigos Road connects Windsor to Limerick Lane, near Healdsburg, where Limerick Lane crosses Highway 101. It jogs to the east along Arata Lane, and then continues south to Brooks Road South.

Mitchell Lane connects Windsor Road to Conde Lane and provides access to adjacent residential neighborhoods.

Old Redwood Highway traverses the Town of Windsor, and serves as one of its main streets through the Downtown area. While generally retaining its two-lane character, it expands to five lanes between Hembree Lane and Windsor River Road. At the Downtown interchange, Old Redwood Highway carries approximately 28,050 vehicles per day.

Pleasant Avenue connects Old Redwood Highway to Chalk Hill Road to the east, which then connects to State Route (SR) 128, which is a route to Napa County. Adjacent land uses within Windsor include an elementary school and residences.

Shiloh Road has a westerly terminus at Windsor Road, and extends beyond Old Redwood Highway on the east side of Windsor to Faught Road where it turns into Shiloh Ridge. It generally has two lanes, though it expands to five lanes between Skylane Boulevard and Caletti Drive, and also near Hembree Lane.

Skylane Boulevard provides a route to the Sonoma County Airport via Airport Boulevard to the south, connecting to Shiloh Road on the north end. It generally has two lanes in the Town of Windsor, but expands to three lanes within the County's jurisdiction.

Starr Road is a two-lane street that serves local residential uses as well as an adjacent elementary school. It has a connection to Old Redwood Highway on the north and extends beyond Reiman Lane into the County of Sonoma to the south.

Windsor Road is a two- to three-lane roadway with bike lanes along some segments that connect Old Redwood Highway to Shiloh Road and beyond into Sonoma County. It passes the western edge of the Town Green, the future Sonoma-Marin Area Rail Transit (SMART) rail stop, Windsor High School, and the Windsor Fire and Public Works Departments.

Windsor River Road passes the southerly edge of the Town Green area, connecting Old Redwood Highway to Eastside Road in the County of Sonoma. In addition to serving retail and commercial uses Downtown, it serves adjacent neighborhoods on the west side of the Town.

Study Intersections

Intersections are typically the most critical element within a roadway system because they are the points where opposing and intersecting streams of traffic must all be served, and the locations where the majority of vehicular delay occurs along a corridor. A variety of right-of-way controls exist to direct traffic through intersections.

The operation of individual intersections can be heavily influenced by that of nearby intersections along a corridor. Closely-spaced signalized intersections can result in queuing from one intersection that affects downstream operation such that drivers cannot move through an intersection despite having a green light. When this occurs, the theoretical capacity of the intersection decreases, resulting in lower service levels than would be otherwise indicated. The capacity of the Town's street system, especially at the Downtown interchange and on Shiloh Road, may also be affected by the ramp metering at Highway 101 that was implemented by the California Department of Transportation (Caltrans) in 2014.

The study area for the traffic analysis was selected to include the locations that were evaluated when developing the Traffic Impact Mitigation program, as well as those that have been identified as potentially needing future improvements through other, more recent traffic analyses. The study area was identified in consultation with Windsor Town staff as those intersections in need of study and most likely to be impacted. The study area chosen consists of the following 33 intersections located in the Town of Windsor, shown in Figure 18:

1. Old Redwood Highway/Highway 101 South ramps (north Town limit)
2. Old Redwood Highway/Starr Road
3. Old Redwood Highway/Arata Lane
4. Highway 101 North Off-ramp/Arata Lane
5. Los Amigos Road/Arata Lane
6. Brooks Road South/Arata Lane
7. Brooks Road South/Foothill Drive
8. Hembree Lane/Foothill Drive
9. Old Redwood Highway/Windsor Road
10. Brooks Road South/Glen Miller Drive
11. Brooks Road South/Los Amigos Road
12. Brooks Road South/Lakewood Drive
13. Windsor River Road/Starr Road
14. Windsor River Road/Windsor Road
15. Windsor River Road/Bell Road–Market Street
16. Windsor River Road/Old Redwood Highway–Conde Lane
17. Old Redwood Highway/Highway 101 South Ramps
18. Old Redwood Highway/Highway 101 North off-ramp–Lakewood Drive
19. Windsor Road/Jaguar Way
20. Old Redwood Highway/Alden Lane
21. Old Redwood Highway/Hembree Lane
22. Old Redwood Highway/Pleasant Avenue
23. Windsor Road/Mitchell Lane
24. Conde Lane/Mitchell Lane
25. Hembree Lane/Shiloh Center Drive
26. Windsor Road/Shiloh Road
27. Skylane Boulevard-Golf Course Drive/Shiloh Road

28 Conde Lane/Shiloh Road
29 Caletti Avenue/Shiloh Road
30 Highway 101 South Ramps/Shiloh Road
31 Highway 101 North Ramps/Shiloh Road
32 Hembree Lane/Shiloh Road
33 Old Redwood Highway/Shiloh Road

Existing Pedestrian and Bicycle Facilities

This section describes the existing bicycle and pedestrian network in the Town of Windsor. Existing and planned bicycle facilities in Windsor are shown in the *Windsor Bicycle and Pedestrian Master Plan*, an excerpt of which is shown in Figure 19.

Pedestrian Facilities

Walking is an important means of mobility as it is the mode most readily available to all users, and the only mode available to some of the Town's most vulnerable citizens. While sidewalks are installed on both sides of most streets built under current development standards, there are substantial gaps in the sidewalk network along frontages of parcels that were either developed prior to the Town's incorporation or that remain currently undeveloped. These gaps in the sidewalk network translate to access that is less safe, less convenient, and less desirable for walking.

The Town of Windsor's network of pedestrian facilities includes sidewalks, pathways, curb ramps, crosswalks and amenities such as bulbouts, pedestrian-scale lighting, benches, transit shelters, street trees, landscape plantings and decorative paving treatment. Sidewalks are provided on the majority of streets in Windsor, with continuous sidewalks along most cross-town streets within the core areas. Downtown and surrounding neighborhoods have nearly complete sidewalk coverage, while outlying residential areas have varying coverage.

The heaviest pedestrian activity in Windsor is largely focused in central Windsor and the Town Green area, though pedestrian facilities are currently discontinuous between the east and west sides of Highway 101. The Town recently constructed improvements that include a new crosswalk on Lakewood Drive at Old Redwood Highway, a speed table (traffic calming device) on the Highway 101 north on-ramp at the Downtown interchange, and a sidewalk connecting Lakewood Drive to the on-ramp, providing full pedestrian access along the northeasterly side of Old Redwood Highway.

Pedestrian access is also key in the vicinity of Windsor's schools. Other sites that attract pedestrian traffic include the Shiloh Shopping Center, Huerta Gymnasium, Windsor Community Center, Windsor Senior Center, Keiser Park, Esposti Park, Hiram Lewis Park, Foothill Regional Park, Shiloh Ranch Regional Park and the Town's creek trails.

The primary challenge to walking in Windsor is the limited connectivity between the east and west sides of town due to the barrier created by Highway 101. With just three highway crossing locations, each of which serves high volumes of pedestrians, and the Town's three sets of freeway on- and off-ramps, pedestrians encounter conditions that are not inviting.

Figure 18 Project Study Intersections

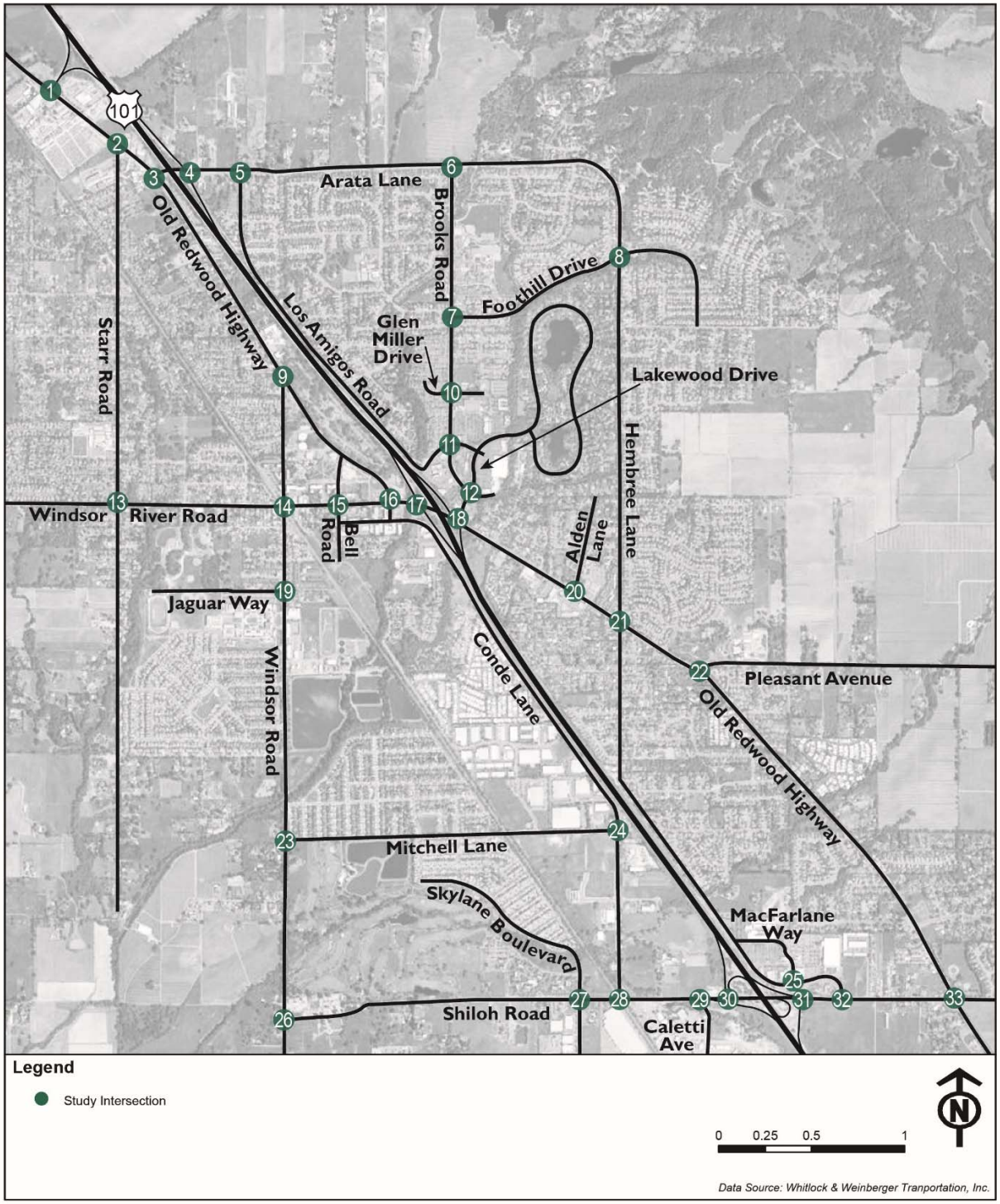
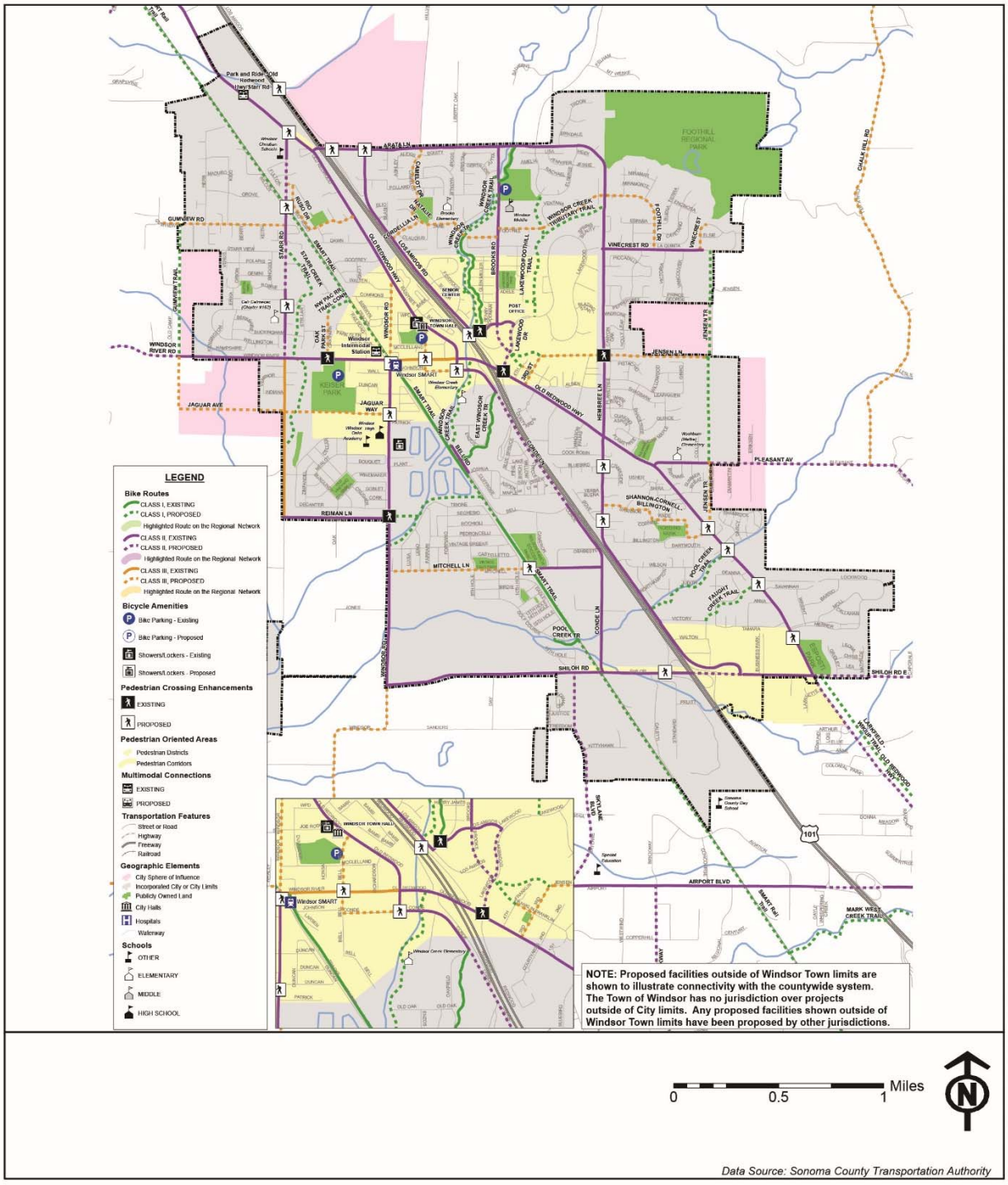


Figure 19 Existing and Planned Bicycle Facilities



Bicycle Facilities

Bicycle circulation in Windsor is supported by an existing network of multi-use paths, on-street bike lanes, and bicycle routes. The Windsor Bicycle and Pedestrian Master Plan, shown in Figure 19, expands upon the existing network to create a robust bicycle circulation system in Windsor.

Bicycle facilities in Windsor consist of Class I bikeways, Class II bike lanes, and Class III bike routes. Approximately 2.7 miles of Class I bikeways exist in Windsor, primarily in the form of creek trails and along the SMART rail corridor. The majority of Windsor's bikeway system is comprised of Class II bike lanes, with 16.85 miles of bike lanes located throughout the town on many major roadways. A total of 1.08 miles of Class III bike routes exist on Starr and Windsor River Roads.

The bikeways network has been developed to provide bicycle access to destinations throughout Windsor. The network consists of primary routes that connect through the Town and provide access to neighboring jurisdictions, as well as local bikeways that provide access to neighborhoods and destinations throughout the community. In recent years, Windsor has made significant steps in the development of this Class II bikeway network. Currently, segments of Class II bike lanes are provided on most of the Town's cross-town connectors with approximately 70 percent of the Town-wide network completed. However, it should be noted that there are no Class II bike lanes on Windsor River Road in the Downtown area. Significant work still remains and Highway 101, which bisects the community, is a significant barrier to continuous east-west bicycle access.

Transit Service

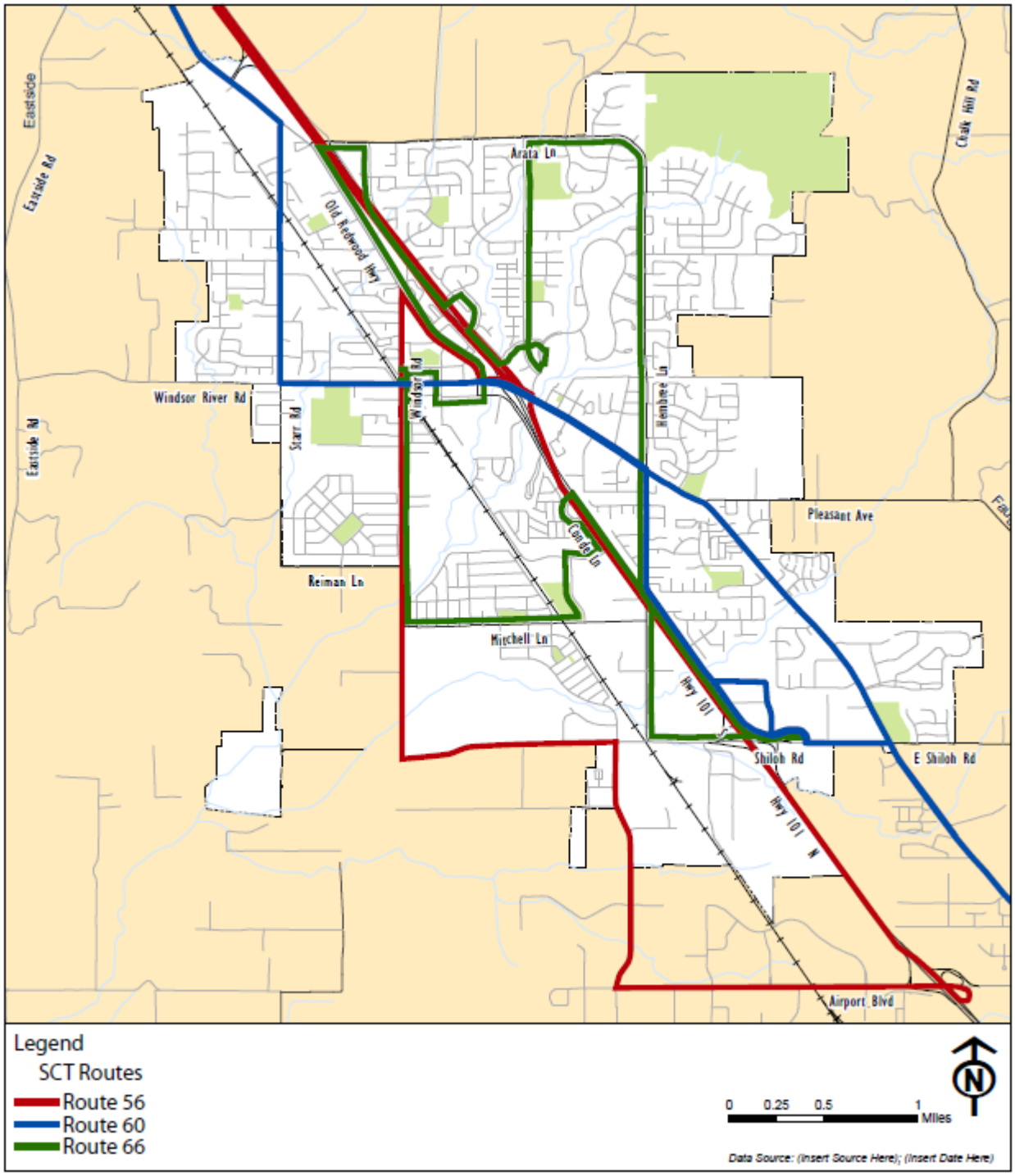
The Town of Windsor is currently served by bus transit services. While rail transit will be provided by SMART in 2021, it is unclear at this time when the line will be extended to Windsor and beyond. The closest station that is included in the first phase of the project will be located near Airport Boulevard, which forms part of the southern boundary of the Town's Planning Area.

Sonoma County Transit

Sonoma County Transit (SCT) provides fixed bus route systems within and around Windsor. A map showing bus routes in and surrounding the Town is shown in Figure 20. There is one route that operates in Windsor Monday through Sunday, Route 60; one route with Monday through Saturday Service, Routes 66; and one route operating Monday through Friday, Route 62. SCT offers one ride, regional transit, 20-ride, monthly, 31-day, and youth summer passes. For adults the prices range from $1.25 for one ride to $62.50 for a monthly pass. For students the prices range from $1.05 for one ride to $47.00 for a monthly pass. Senior, disabled, and Medicare card holders ride for between $0.60 for one ride and $31.25 for a monthly pass.

Route 60 operates Monday through Friday with approximately 20- to 30-minute headways between 6:30 a.m. and 10:00 p.m. On weekends the route operates with approximately one and a half hour headways. The route provides service from Santa Rosa to Cloverdale stopping seven times throughout Windsor. Route 62 operates Monday through Friday with half-hour to two-hour headways from 7:00 a.m. to 6:00 p.m. This route runs from Santa Rosa to Windsor, serving the Santa Rosa Airport. Route 66 operates Monday through Friday with half-hour headways between 8:00 a.m. and 5:00 p.m., and on Saturday with one-hour headways from 9:30 a.m. to 3:30 p.m. Route 66 functions as a local bus route, operating solely within Windsor and stopping in many different locations throughout the Town. Figure 20 shows bus routes in and surrounding the Town.

Figure 20 Bus Routes in and Surrounding the Town



Sonoma-Marin Area Rail Transit (SMART)

The SMART commuter rail system is a 70-mile rail line that is planned to run from Cloverdale, at the north end of Sonoma County, to Larkspur where the Golden Gate Ferry connects Marin County with San Francisco. SMART rail service was initiated in 2017, between Airport Boulevard (just south of Windsor) and San Rafael, with service planned to be extended southward to Larkspur in 2018. Subsequent, currently-unfunded phase(s) will extend the rail line to Windsor's station at Windsor River Road and Windsor Road, and ultimately to Healdsburg and Cloverdale. The SMART project is also intended to provide a critical north-south transportation route for bicyclists and pedestrians, with a combination of multi-use pathways and on-street facilities located along or adjacent to the right-of-way, though many segments of the pathway also remain unfunded.

Paratransit

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. Individuals must be registered and certified as ADA eligible before using the service. Paratransit operators are required by the ADA to service areas within three-quarters of a mile of their respective, public fixed-route service. Volunteer Wheels serves as the ADA paratransit operator for Sonoma County Transit and the Town of Windsor. Service hours are Monday through Friday from approximately 5:00 a.m. to 10:45 p.m. and Sunday and Sunday from 7:00 a.m.to 10:00 p.m. Ride reservations can be scheduled daily between 8:00 a.m. and 5:00 p.m., or between 9:00 a.m. 5:00 p.m. on Saturday or Sunday. A telephone answering system is also available to record messages/cancellations during off hours.

Existing Truck Routes

Commercial vehicles are allowed to operate on only a portion of the available public roads, with access to many roads restricted due to weight limits or size restrictions. As a State highway, however, Highway 101 is considered a "major truck route" and accommodates all sizes and types of trucks.

Truck routes within the Town serve uses such as the concentration of light and heavy industrial developments that exist along Conde Lane and Caletti Avenue, just west of and between Highway 101 and the SMART tracks. Several additional freight-generating uses exist along Old Redwood Highway east of Highway 101. Many of these are commercial uses and require delivery of goods. Currently, Old Redwood Highway, Conde Lane, Shiloh Road, and Caletti Avenue are designated as truck routes.

Truck traffic through Windsor on Highway 101 accounts for nearly six percent of the daily traffic on the highway. A classification count performed in March 2014 on Old Redwood Highway indicates that truck traffic on this primary cross-town street is about 0.5 percent of the daily volume.

Railways

Rail freight operation on the SMART rail corridor is overseen by the North Coast Railroad Authority (NCRA). Freight service was suspended for nearly ten years due to storm damage, but resumed in July 2011 to one manufacturing facility in southern Windsor for several months before that facility ceased operations. Regardless, the potential exists for several round trip freight trains per week to travel through Windsor, as does the potential for rail-based freight operations within the Town (particularly in the vicinity of Shiloh Road and Caletti Avenue). While the tracks to the north of

Windsor have not been repaired, it is anticipated that rail service will ultimately be extended northward to Willits, resulting in up to four daily trains passing through Windsor six days per week.

Aviation Facilities

The Charles M. Shultz Sonoma County Airport (STS) is located just south of Windsor in unincorporated Sonoma County, approximately two miles west of Highway 101. While the airport is not within the Town limits, it does contribute to air travel within the region, as well as vehicle traffic, noise, and air pollution. Further, some flight paths cross over developed areas within the Town.

To address runway safety issues, Sonoma County recently implemented improvements to the airport. The associated runway extension has allowed larger aircraft, including several commercial carriers, to service the airport.

Regulatory Setting

The Town of Windsor General Plan along with a variety of regional, State, and federal plans, legislation, and policy directives provide guidelines for the safe operation of streets and transportation facilities in Windsor. While the Town of Windsor has primary responsibility for the maintenance and operation of transportation facilities within the Town, Town staff works on a continual basis with responsible regional, State, and federal agencies including the County of Sonoma, SCTA, Metropolitan Transportation Commission (MTC), Caltrans, and Federal Highway Administration (FHWA), as well as others, to maintain, improve, and balance the competing transportation needs of the community and the region.

This section describes transportation policies, laws, and regulations that would apply to the Circulation Element of the proposed 2040 General Plan. This information provides a context for the impact discussion related to the proposed 2040 General Plan's consistency with applicable regulatory conditions.

State

Senate Bill 743

On September 27, 2013 California Governor Jerry Brown signed Senate Bill (SB) 743 into law which includes changes to elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts in California. In response to the adoption of SB 743 (Steinberg, 2013), The California Governor's Office of Planning and Research (OPR) is preparing updates to the CEQA Guidelines (Section 15064.3) that will change the criteria for determining what constitutes a significant transportation-related environmental impact. The revised criteria will rely upon quantification of a vehicle miles traveled (VMT) metric instead of a LOS metric. The most recent draft of the guideline changes are outlined in the document Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, OPR, January 2016, though an updated proposal is anticipated to be released by late 2017. Based on guidance from OPR, jurisdictions are anticipated to be granted a two-year grace period in which to implement the revised guidelines once they are formally adopted by the State.

State of California and Caltrans Regarding Complete Streets

On September 30, 2008, the California Complete Streets Act of 2008 was signed into law. As of January 2011, AB 1358 requires any substantive revision of the circulation element of a city or

county's general plan to identify how they will safely accommodate the circulation of all users of the roadway including pedestrians, bicyclists, children, seniors, individuals with disabilities, and transit riders, as well as motorists.

Caltrans Deputy Directive 64-R1: Complete Streets – Integrating the Transportation System. In 2001, Caltrans adopted Deputy Directive 64; a policy directive related to non-motorized travel throughout the state. In October 2008, Deputy Directive 64 was strengthened to reflect changing priorities and challenges. DD 64-R1 states:

> The Department views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation system. Providing safe mobility for all users, including motorists, bicyclists, pedestrians and transit riders, contributes to the Department's mission/vision: "Improving Mobility across California."

Successful long-term implementation of this policy is intended to result in more options for people to go from one place to another, less traffic congestion and greenhouse gas emissions, more walkable communities (with healthier, more active people), and fewer barriers for older adults, children, and people with disabilities.

Director's Policy 22 (DP-22): Director's Policy on Context Sensitive Solutions. Director's Policy 22, a policy regarding the use of "Context Sensitive Solutions" on all State highways, was adopted by Caltrans in November of 2001. The policy reads:

> The Department uses "Context Sensitive Solutions" as an approach to plan, design, construct, maintain, and operate its transportation system. These solutions use innovative and inclusive approaches that integrate and balance community, aesthetic, historic, and environmental values with transportation safety, maintenance, and performance goals. Context sensitive solutions are reached through a collaborative, interdisciplinary approach involving all stakeholders.

The context of all projects and activities is a key factor in reaching decisions. It is considered for all State transportation and support facilities when defining, developing, and evaluating options. When considering the context, issues such as funding feasibility, maintenance feasibility, traffic demand, impact on alternate routes, impact on safety, and relevant laws, rules, and regulations must be addressed.

The policy recognizes that "in towns and cities across California, the State highway may be the only through street or may function as a local street," that "these communities desire that their main street be an economic, social, and cultural asset as well as provide for the safe and efficient movement of people and goods," and that "communities want transportation projects to provide opportunities for enhanced non-motorized travel and visual quality." The policy acknowledges that addressing these needs will assure that transportation solutions meet more than just traffic and operational objectives.

Caltrans Facility Operation

Intersections of ramps from Highway 101 to Town streets are under the jurisdiction of Caltrans. Under their adopted standards, Caltrans indicates that they endeavor to maintain operation at the transition from LOS C to LOS D. Based on previous discussions with Caltrans staff, it is understood that the standard is to be applied to the overall average intersection delay and not associated with

any single movement or approach. Under this approach, if one movement experiences very high delay and also has moderate to high traffic volumes, the overall delay and LOS should reflect the critical nature of the condition. However, if one movement is expected to experience high delay, but has very low traffic volumes, the overall intersection operation will likely still meet Caltrans standards.

Regional and Local

Metropolitan Transportation Commission

The current Regional Transportation Plan (RTP) produced by MTC, the Plan Bay Area 2040 (Plan), was adopted in July 2017. The Plan sets forth regional transportation and land use policy, and provides capital program planning for all regional, State, and federally funded projects. In addition, the Plan provides strategic investment recommendations to improve regional transportation system performance through the year 2040, including investments in regional highway, transit, local roadway, bicycle, and pedestrian projects. Transportation projects programmed in the vicinity of Windsor include the SMART train, though the timing for its arrival in Windsor is currently uncertain. The Plan also programs Countywide funding for roadway rehabilitation, improved transit headways, safe routes to school projects, and bicycle-pedestrian improvements.

Sonoma County Transportation Authority

The SCTA acts as the countywide planning and programming agency for transportation related issues in Sonoma County. SCTA plays a leading role in transportation by securing funds, providing project oversight, and initiating long term planning activities. In 1997 SCTA relinquished its position as the County's Congestion Management Agency (CMA), and as a result, does not maintain or enforce LOS standards on roadway facilities within Sonoma County.

Comprehensive Transportation Plan

Every four years the SCTA updates the Sonoma Comprehensive Transportation Plan (CTP), a multi-modal transportation plan that documents existing conditions and prioritizes regional transportation needs throughout Sonoma County for the next 25 years. The CTP establishes countywide goals, objectives, and policies for improving mobility on Sonoma County's streets, highways, transit systems, and bicycle/pedestrian facilities, as well as strategies to reduce transportation related impacts. There are no major roadway projects in Windsor with funding identified in the CTP other than those for which the Town's traffic mitigation fee is identified as the funding source.

Bicycle and Pedestrian Master Plan

The 2008 Windsor Bicycle and Pedestrian Master Plan was developed as a component of the Sonoma County Transportation Authority's *Countywide Bicycle and Pedestrian Master Plan*. The Countywide Plan was prepared to foster local and regional coordination, to plan primary facilities that connect Sonoma County's communities, and to develop long-term system planning. The Plan established bicycle and pedestrian policy for Cotati and the larger Countywide Bicycle System, along with bicycle and pedestrian infrastructure projects, and programmatic improvements. In 2014, the Windsor Plan was updated to reflect recently completed improvements as well as provide a more balanced approach between pedestrian and bicycle modes, with a particular emphasis on addressing pedestrian safety at street crossings.

The principal goal of the Bicycle and Pedestrian Master Plan is “to develop and maintain a comprehensive countywide bicycle and pedestrian transportation system, which includes projects, programs, and policies that work together to provide safe and efficient opportunities for bicyclists and pedestrians to access public transportation, school, work, shopping, services, recreation and residences.”

Town of Windsor

Windsor has existing policies in the General Plan relative to traffic operation and the transportation system. The key policies are as follows.

Policy D.1. Promote the development of an integrated, multimodal transportation system that balances the circulation and mobility needs of pedestrians, bicyclists, transit, automobiles, and goods movement vehicles. Level of Service (LOS) standards for the implementation of D.1 is as follows: LOS D for Crosstown Streets and signalized intersections; LOS E for the intersections of Old Redwood Hwy/Highway 101 North off-ramp/Lakewood Drive, Old Redwood Highway/Highway 101 South Ramps, and Old Redwood Highway/Conde Lane/Windsor River Road.

Policy D.2. Provide an interconnected street network that is accessible and friendly to all modes of travel.

Policy D.3. Provide "complete streets" with facilities, and amenities that meet the needs of all users, regardless of their age or ability, or whether they are walking, bicycling, taking transit, or driving.

Policy D.4. Ensure that the design of streets meets travel demands while also creating a safe and pleasant environment for pedestrians, bicyclists, and transit riders.

Policy D.5. Provide opportunities for Windsor residents, visitors and employees, to circulate about town without total reliance on the automobile.

Policy D.6. Require new development to pay its fair share of the costs of future transportation improvements.

4.14.2 Impact Analysis

Methodology and Thresholds of Significance

Methodology

This section describes the quantitative roadway impact analyses that were conducted for 2040 conditions assuming the expected 2040 buildout of the General Plan (as described in detail in Section 2.6 of the Project Description). A discussion of the transportation analysis methodology is included below.

Traffic Modeling

Future traffic volumes for the year 2040 were determined using the SCTA regional travel demand model (SCTM\10) to determine future traffic associated with regional growth and travel patterns as well as traffic growth associated with the land uses contained in Windsor’s 2040 General Plan. The year 2040 countywide land use database contained within the SCTA model was modified to hold existing land use quantities constant, while still reflecting regional land use and circulation network

changes outside the Town. Future "no project" turning movement projections were then calculated for the study intersections using the SCTA future year scenario.

Trip Generation

The *Trip Generation Manual*, 9th Edition, 2012, by the Institute of Transportation Engineers (ITE) was used as the basis for determining the likely amount of vehicle traffic that would be generated by potential future development. This publication is a standard reference used by jurisdictions throughout the country, and is based on actual trip generation studies performed at numerous locations in areas of various populations. The trip generation land use categories used in the analysis and associated levels of development under the current General Plan are shown in Table 34.

Table 34 Current General Plan Development and Applied Trip Generation Rates

Land Use Category/Description	Units	2010 Quantity	2040 Net Additional	Total Daily Trip Rate
Residential/SF Detached	Dwelling Units	8,413	2,232	9.52
Residential/MF Attached	Dwelling Units	1,896	1,640	6.65
Residential/Senior Housing	Dwelling Units	24	25 units	4.00
Office/Office	KSF	650	292.573	11.03
Service/Service	Rooms	350	344	8.92
Retail/Strip Commercial	KSF	300	235.079	44.00
Retail/Shopping Center	KSF	664	407.245	*
Industrial/Light Industrial	KSF	1,083	270.025	6.97
Industrial/Heavy Industrial	KSF	242	75.29	1.50
Industrial/Warehouse	KSF	1,649	258.654	3.56
Education/School	Students	5,447	500	1.50
Service/Institutional	KSF	333	13.7 KSF	6.48
Recreational/Recreational	Acres	432	None	4.10

Notes: For detailed breakdown see Town of Windsor General Plan Buildout Model; Formula for shopping center:

* Daily Trips = EXP(5.83 + 0.65 * LN(KSF))

Source: Sonoma County Transportation Authority (SCTA)

The following improvements identified as being needed in the existing 1996 General Plan have already been completed and therefore were also included in the analysis as part of existing conditions.

- Old Redwood Highway/Windsor Road was converted to roundabout control in 2016.
- Windsor Road/Jaguar Way was signalized in 2016.
- Old Redwood Highway/Highway 101 north off-ramp-Lakewood Drive off-ramp has been restriped to include a shared left-turn/through lane in place of a through-only lane and a second left turn lane was constructed on Lakewood Drive.

In addition, the following roadway improvements have been previously identified and are currently included in the Town's Traffic Impact Mitigation Fee program. These improvements are incorporated in the 2040 General Plan to accommodate projected year 2040 traffic volumes.

- Widen **Old Redwood Highway** to provide two lanes in each direction between Arata Lane and the Highway 101 South ramps intersection.
- Complete new **northbound on-ramp to Highway 101** from Arata Lane, including re-routing Los Amigos Road north of Arata Lane to connect with the existing extension to the south.
- Widen **Arata Lane** to provide additional lanes between Old Redwood Highway and Los Amigos Road and provide sufficient clearance for trucks.
- Signalize **Windsor River Road/Bell Road-Market Street** (under construction at the time of publication).
- Extend **Jaguar Way** to connect to Starr Road.
- Widen the **Shiloh Road** overpass to two lanes each way.
- Modify the lane assignment on the **Highway 101 North off-ramp at Shiloh Road** to include two left-turn lanes and one right-turn lane.
- Add right-turn overlap phasing at **Shiloh Road/Old Redwood Highway**.

The following projects, included in the 1996 General Plan and/or the Traffic Impact Mitigation Fee program, were not assumed for purposes of this analysis so that their potential need (or lack thereof) could be evaluated.

- Widening of Old Redwood Highway to four lanes from Hembree Lane to Shiloh Road.
- Widening of Shiloh Road from Hembree Lane to Old Redwood Highway.
- Signalization of Conde Lane/Johnson Street was planned, but the intersection is instead being modified to eliminate the stop signs and create a through route along the north and east legs.
- Modification of Old Redwood Highway/US 101 North Ramp-Lakewood Drive to include a second right-turn lane from Lakewood Drive to northbound Old Redwood Highway.
- Modification to Shiloh Road/Conde Lane to add capacity is not expected to be needed by the horizon year of 2040 unless the connection between Conde Lane and Caletti Avenue is made, and there is currently no anticipated development that would result in this connection.

Intersections

The study intersections were analyzed using methodologies published in the *Highway Capacity Manual* (HCM), Transportation Research Board, 2010. This source contains methodologies for various types of intersection control, all of which are related to a measurement of delay in average number of seconds per vehicle. The Vistro analysis software was used to implement the HCM analysis.

The LOS for the intersections with side-street stop controls, or those which are unsignalized and have one or two approaches stop controlled, were analyzed using the “Two-Way Stop-Controlled” intersection capacity method from the HCM. This methodology determines a LOS for each minor turning movement by estimating the level of average delay in seconds per vehicle. Results are presented for individual movements together with the weighted overall average delay for the intersection.

The study intersections with stop signs on all approaches were analyzed using the “All-Way Stop-Controlled” Intersection methodology from the HCM. This methodology evaluates delay for each

approach based on turning movements, opposing and conflicting traffic volumes, and the number of lanes. Average vehicle delay is computed for the intersection as a whole, and is then related to a LOS.

The study intersections that are currently controlled by a traffic signal, or may be in the future, were evaluated using the signalized methodology from the HCM. This methodology is based on factors including traffic volumes, green time for each movement, phasing, whether or not the signals are coordinated, truck traffic, and pedestrian activity. Average stopped delay per vehicle in seconds is used as the basis for evaluation in this LOS methodology. For purposes of this analysis, delays were calculated using optimized signal timing.

Roundabout intersection operation was determined using methodologies included in the HCM. The primary input values used in the HCM roundabout capacity model is traffic volume data and the configuration of lanes. The HCM methodologies were applied within the SIDRA Intersection 7 analysis software.

The ranges of delay associated with the various levels of service are indicated in Table 35. The ranges indicated for signalized intersections also apply to roundabout-controlled intersections.

Table 35 Intersection Level of Service Descriptions

LOS	Two-Way Stop-Controlled	All-Way Stop-Controlled	Signalized
A	Delay of 0 to 10 seconds. Gaps in traffic are readily available for drivers exiting the minor street.	Delay of 0 to 10 seconds. Upon stopping, drivers are immediately able to proceed	Delay of 0 to 10 seconds. Most vehicles arrive during the green phase, so do not stop at all.
B	Delay of 10 to 15 seconds. Gaps in traffic are somewhat less readily available than with LOS A, but no queuing occurs on the minor street.	Delay of 10 to 15 seconds. Drivers may wait for one or two vehicles to clear the intersection before proceeding from a stop.	Delay of 10 to 20 seconds. More vehicles stop than with LOS A, but many drivers still do not have to stop.
C	Delay of 15 to 25 seconds. Acceptable gaps in traffic are less frequent, and drivers may approach while another vehicle is already waiting to exit the side street.	Delay of 15 to 25 seconds. Drivers will enter a queue of one or two vehicles on the same approach, and wait for vehicle to clear from one or more approaches prior to entering the intersection.	Delay of 20 to 35 seconds. The number of vehicles stopping is significant, although many still pass through without stopping.
D	Delay of 25 to 35 seconds. There are fewer acceptable gaps in traffic, and drivers may enter a queue of one or two vehicles on the side street.	Delay of 25 to 35 seconds. Queues of more than two vehicles are encountered on one or more approaches.	Delay of 35 to 55 seconds. The influence of congestion is noticeable, and most vehicles have to stop.
E	Delay of 35 to 50 seconds. Few acceptable gaps in traffic are available, and longer queues may form on the side street.	Delay of 35 to 50 seconds. Longer queues are encountered on more than one approach to the intersection.	Delay of 55 to 80 seconds. Most, if not all, vehicles must stop and drivers consider the delay excessive.
F	Delay of more than 50 seconds. Drivers may wait for long periods before there is an acceptable gap in traffic for exiting the side streets, creating long queues.	Delay of more than 50 seconds. Drivers enter long queues on all approaches.	Delay of more than 80 seconds. Vehicles may wait through more than one cycle to clear the intersection.

* Source: *Highway Capacity Manual,* Transportation Research Board , 2010

Existing Intersection Levels of Service

Operation of the study intersections was evaluated for the a.m. and p.m. peak periods. The morning peak hour occurs between 7:00 and 9:00 a.m. and reflects conditions during the home to work or school commute, while the p.m. peak hour occurs between 4:00 and 6:00 p.m. and typically reflects the highest level of congestion during the homeward-bound commute. It is noted that the morning peak hour is particularly impacted by school traffic as a result of the local school district's "total community" model wherein students in the same grade travel from throughout the town to attend the same school.

Traffic counts for all of the study intersections were obtained during both peaks during the week of August 25, 2014, one week after all local schools were back in session after the summer recess and during the start of the fall grape harvest. Based on this analysis, all 33 of the study intersections are operating at LOS D or better during both peak periods. These results are summarized in Table 36.

Table 36 Existing Peak Hour Intersection Levels of Service

			A.M. Peak Hour		P.M. Peak Hour	
Study Intersection		**Controls**	**Delay**	**LOS**	**Delay**	**LOS**
1	ORH/Highway 101 South ramps	Signal	11.7	B	11.7	B
2	ORH/Starr Rd	Signal	11.1	B	11.1	B
3	ORH/Arata Ln	Signal	12.1	B	12.1	B
4	Highway 101 North ramps/Arata Ln	Signal	8.9	A	8.9	A
5	Los Amigos Rd/Arata Ln	TWSC	1.3	A	1.5	A
Northbound (Los Amigos) Approach			*17.7*	*C*	*14.3*	*B*
6	Brooks Rd-S/Arata Ln	AWSC	13.8	B	9.4	A
7	Brooks Rd-S/Foothill Dr	AWSC	12.8	B	9.5	A
8	Hembree Ln/Foothill Dr	AWSC	10.5	B	8.9	A
9	ORH/Windsor Rd	RNDBT	5.6	A	4.8	A
10	Brooks Rd-S/Glen Miller Dr	Signal	6.8	A	8.0	A
11	Brooks Rd-S/Los Amigos Rd	Signal	18.0	B	22.6	C
12	Brooks Rd-S/Lakewood Dr	Signal	33.6	C	33.2	C
13	Windsor River Rd/Starr Rd	AWSC	14.1	B	10.5	B
14	Windsor River Rd/Windsor Rd	Signal	22.1	C	16.8	B
15	Windsor River Rd/Bell Rd–Market St	TWSC	1.5	A	1.8	A
Northbound (Bell) Approach			*16.9*	*C*	*20.4*	*C*
Southbound (Market) Approach			*25.4*	*D*	*25.3*	*D*
16	Windsor River Rd/ORH–Conde Ln	Signal	28.9	C	25.8	C
17	Highway 101 SB Ramps/ORH	Signal	23.6	C	19.0	B
18	ORH/ Highway 101 North off-ramp–Lakewood Dr	Signal	35.2	D	44.1	D
19	Windsor Rd/Jaguar Wy	Signal	6.3	A	7.3	A
20	ORH/Alden Ln	Signal	7.0	A	8.0	A
21	ORH /Hembree Ln	Signal	13.5	B	14.1	B
22	ORH/Pleasant Ave	Signal	9.4	A	6.5	A
23	Windsor Rd/Mitchell Ln	TWSC	1.5	A	1.6	A

Study Intersection	Controls	A.M. Peak Hour		P.M. Peak Hour	
		Delay	LOS	Delay	LOS
Westbound (Mitchell) Approach		**13.0**	**B**	**11.6**	**B**
24 Conde Ln/Mitchell Ln	AWSC	9.8	A	9.6	A
25 Hembree Ln/Shiloh Center Dr	Signal	14.7	B	16.0	B
26 Windsor Rd/Shiloh Rd	TWSC	8.5	A	7.9	A
Westbound (Shiloh) Approach		*12.4*	*B*	*10.7*	*B*
27 Skylane Blvd-Golf Course Dr/Shiloh Rd	Signal	12.6	B	12.6	B
28 Conde Ln/Shiloh Rd	Signal	15.6	B	15.6	B
29 Caletti Ave/Shiloh Rd	TWSC	8.1	A	8.3	A
Northbound (Caletti) Approach		*7.4*	*A*	*7.3*	*A*
30 Highway 101 South ramps/Shiloh Rd	Signal	6.9	A	6.9	A
31 Highway 101 North ramps/Shiloh Rd	Signal	9.5	A	9.5	A
32 Hembree Ln/Shiloh Rd	Signal	8.3	A	10.2	B
33 ORH/Shiloh Rd	Signal	18.6	B	19.9	B

Notes: Delay is in average seconds per vehicle; LOS = Level of Service; ORH = Old Redwood Highway; TWSC = Two-way stop controls; AWSC = All-way stop controls; RNDBT = Roundabout. Delay for stop-controlled site street approaches is show in *italics.*

Source: W-Trans

Significance Thresholds

The following thresholds of significance are based on Appendix G to the CEQA Statute and Guidelines. For the purposes of this EIR, implementation of the 2040 General Plan may have a significant adverse impact if it would:

1 Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.

2 Conflict with an applicable congestion management program, including, but not limited to level of services standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

3 Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

4 Substantially increase traffic-related hazards due to a design feature or incompatible uses.

5 Result in inadequate emergency access.

6 Conflict with adopted policies, plans, or programs supporting alternative transportation.

Project Impacts and Mitigation Measures

Threshold:	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.
Threshold:	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.

IMPACT T-1 NEW DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN MAY INCREASE TRAFFIC AT CERTAIN LOCATIONS IN WINDSOR. THIS TRAFFIC MAY CONFLICT WITH POLICIES AND THRESHOLDS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM AND APPLICABLE CONGESTION MANAGEMENT PROGRAMS. IMPACTS WOULD BE SIGNIFICANT BUT MITIGABLE.

Growth and development in Windsor associated with buildout of the 2040 General Plan would increase traffic on local intersections compared to existing conditions. Additionally, development outside the Town's boundaries would contribute to increased traffic at Town intersections. Operation would deteriorate from a projected acceptable LOS C to LOS F at Old Redwood Highway/Starr Road as a result of the 2040 General Plan volumes compared to the No Project condition.

Table 37 summarizes the LOS at study area intersections under existing conditions, future year 2040 Cumulative Conditions without the 2040 General Plan (No Project), and the year 2040 Cumulative Conditions with the 2040 General Plan. Cumulative conditions for the year 2040 include growth throughout Sonoma County and the region, including planned infrastructure improvements. Those intersections that are estimated to operate below an acceptable LOS level are bolded. The study area was identified in consultation with Windsor Town staff as the intersections in need of study and most likely to be impacted.

The applied thresholds of significance for intersections are based on those included in Policy M-3.16 of the 2040 General Plan. LOS D is defined as the minimum acceptable level of congestion during the weekday morning and evening peak periods for high-volume facilities such as freeways, crosstown streets, and signalized or all-way stop-controlled intersections. This standard should apply at all of these locations except the signalized intersections at Old Redwood Highway/Highway 101 North off-ramp/Lakewood Drive, Old Redwood Highway/Highway 101 South ramps, and Old Redwood Highway/Conde Lane/Windsor River Road.

At side-street stop-controlled unsignalized intersections, LOS is determined for both controlled movements and for the overall intersection. Controlled movements operating at LOS E or LOS F are allowable if: 1) the intersection is projected to operate at LOS C or better overall, and 2) the projected traffic volume on the controlled movement is 30 vehicles or less per hour on approaches with single lanes, or 30 vehicles or less per hour per lane on multi-lane approaches. If an intersection is operating at LOS E or F without project-generated traffic added, the project's impact shall be considered less than significant if it does not cause operation to fall from LOS E to LOS F and it increases average delay for the intersection as a whole by five seconds or less. Level of service standards shall not apply to minor intersections comprised of only local streets.

For this analysis, the year 2040 Cumulative Conditions without the proposed 2040 General Plan scenario (No Project) include growth throughout Sonoma County and the region, including planned infrastructure improvements, as well as growth within the Town of Windsor that would result from buildout of the current 2015 General Plan. The 2040 Cumulative Conditions with 2040 General Plan assume the same level of growth throughout Sonoma County and the region, the planned infrastructure improvements including those in the 2040 General Plan, in addition to the anticipated growth under the proposed 2040 General Plan (as described in Section 2.6 of this EIR). As shown in Table 37, Future LOS in the year 2040 under Cumulative No Project conditions would result in an unacceptable LOS at seven intersections, whereas under the 2040 Cumulative Conditions with the 2040 General Plan, only four of the 33 intersections are projected to operate at an unacceptable service level. Thus, while traffic would increase as a result of the 2040 General Plan compared to existing conditions, compared to future 2040 Cumulative No Project conditions, there would be an improvement in traffic conditions at a number of intersections in the General Plan Area. This is in part due to the change of land uses and distribution of those land uses and the associated development pattern assumed under the 2040 General Plan compared to the land uses of the existing 2015 General Plan which results in a reduction in overall daily vehicle miles traveled (VMT) and reduces congestion at certain intersections in the General Plan Area. Specifically, compared to the 2040 Cumulative No Project scenario, service levels under the Cumulative 2040 General Plan scenario would improve from an unacceptable LOS to an acceptable LOS at the following intersections: ORH/Highway 101 South ramps, Highway 101 North ramps/Arata Lane, Los Amigos Road/Arata Lane, and Skylane Boulevard-Golf Course Drive/Shiloh Road. Operation would deteriorate from a projected acceptable LOS C to LOS F at Old Redwood Highway/Starr Road as a result of the 2040 General Plan volumes compared to the No Project condition.

Table 37 Comparison of Traffic Scenarios - Peak Hour Intersection Levels of Service

				Scenario					
				Existing Conditions		2040 Cumulative Conditions No Project		2040 Cumulative Conditions with 2040 General Plan	
Number	Study Intersection	Control	Time Period	Delay	LOS	Delay	LOS	Delay	LOS
1	ORH/Highway 101 South ramps	Signal	AM	11.7	B	26.0	C	15.5	B
			PM	11.7	B	**	**F**	27.2	C
2	ORH/Starr Rd	Signal	AM	11.1	B	35.9	C	**84.1**	**F**
			PM	11.1	B	25.0	C	29.2	C
3	ORH/Arata Ln	Signal	AM	12.1	B	34.8	C	22.3	C
			PM	12.1	B	37.3	D	21.8	C
4	Highway 101 North ramps/Arata Ln	Signal	AM	8.9	A	**65.1**	**E**	19.7	B
			PM	8.9	A	**71.6**	**E**	20.6	C
5	Los Amigos Rd/Arata Ln	TWSC	AM	1.3	A	**	**F**	54.4	D
			PM	1.5	A	**	**F**	19.9	B
	Northbound (Los Amigos) Approach		*AM*	*17.7*	*C*	--	--	--	--
			PM	*14.3*	*B*	--	--	--	--
6	Brooks Rd-S/Arata Ln	AWSC	AM	13.8	B	26.8	D	17.9	C
			PM	9.4	A	11.6	B	10.3	B
7	Brooks Rd-S/Foothill Dr	AWSC	AM	12.8	B	15.0	C	13.4	B
			PM	9.5	A	9.7	A	9.7	A
8	Hembree Ln/Foothill Dr	AWSC	AM	10.5	B	16.3	C	12.3	B
			PM	8.9	A	10.3	B	9.5	A
9	ORH/Windsor Rd	RNDBT	AM	5.6	A	10.6	B	8.6	A
			PM	4.8	A	11.3	B	7.0	A
10	Brooks Rd-S/Glen Miller Dr	Signal	AM	6.8	A	7.1	A	6.9	A
			PM	8.0	A	8.6	A	8.1	A
11	Brooks Rd-S/Los Amigos Rd	Signal	AM	18.0	B	17.8	B	20.3	C
			PM	22.6	C	19.7	B	22.4	C

Number	Study Intersection	Control	Time Period	Scenario					
				Existing Conditions		2040 Cumulative Conditions No Project		2040 Cumulative Conditions with 2040 General Plan	
				Delay	LOS	Delay	LOS	Delay	LOS
12	Brooks Rd-S/Lakewood Dr	Signal	AM	33.6	C	32.1	C	33.6	C
			PM	33.2	C	32.5	C	33.7	C
13	Windsor River Rd/Starr Rd	AWSC	AM	14.1	B	25.0	C	23.3	C
			PM	10.5	B	16.3	C	23.2	C
14	Windsor River Rd/Windsor Rd	Signal	AM	22.1	C	33.7	C	23.6	C
			PM	16.8	B	23.1	C	20.3	C
15	Windsor River Rd/Bell Rd–Market St	TWSC	AM	1.5	A	**84.1**	**F**	11.1	B
			PM	1.8	A	**	**F**	**	**F**
	Northbound (Bell) Approach		*AM*	*16.9*	*C*	--	--	--	--
			PM	*20.4*	*C*	--	--	--	--
	Southbound (Market) Approach		*AM*	*25.4*	*D*	--	--	--	--
			PM	*25.3*	*D*	--	--	--	--
16	Windsor River Rd/ORH–Conde Ln	Signal	AM	28.9	C	26.8	C	29.1	C
			PM	25.8	C	27.6	C	25.7	C
17	ORH/ Highway 101 southbound ramps	Signal	AM	23.6	C	74.0	E	31.4	C
			PM	19.0	B	30.8	C	24.0	C
18	ORH/ Highway 101 North off-ramp–Lakewood Dr	Signal	AM	35.2	D	35.5	D	33.0	C
			PM	44.1	D	47.7	D	79.2	E
19	Windsor Rd/Jaguar Wy	Signal	AM	6.3	A	6.8	A	7.3	A
			PM	7.3	A	7.4	A	8.3	A
20	ORH/Alden Ln	Signal	AM	7.0	A	7.2	A	7.4	A
			PM	8.0	A	8.4	A	8.5	A
21	ORH /Hembree Ln	Signal	AM	13.5	B	17.7	B	17.5	B
			PM	14.1	B	30.5	C	18.9	B

Number	Study Intersection	Control	Time Period	Scenario					
				Existing Conditions		2040 Cumulative Conditions No Project		2040 Cumulative Conditions with 2040 General Plan	
				Delay	LOS	Delay	LOS	Delay	LOS
22	ORH/Pleasant Ave	Signal	AM	9.4	A	10.2	B	11.2	B
			PM	6.5	A	7.2	A	7.5	A
23	Windsor Rd/Mitchell Ln	TWSC	AM	1.5	A	1.7	A	1.5	C
			PM	1.6	A	2.5	A	1.8	C
	Westbound (Mitchell) Approach		*AM*	*13.0*	*B*	*15.4*	*C*	*14.3*	*B*
			PM	*11.6*	*B*	*21.1*	*C*	*14.7*	*B*
24	Conde Ln/Mitchell Ln	AWSC	AM	9.8	A	11.9	B	11.2	B
			PM	9.6	A	13.2	B	10.7	B
25	Hembree Ln/Shiloh Center Dr	Signal	AM	14.7	B	16.1	B	16.1	B
			PM	16.0	B	16.6	B	17.1	B
26	Windsor Rd/Shiloh Rd	TWSC	AM	8.5	A	9.3	A	9.9	A
			PM	7.9	A	11.0	C	9.83	A
	Westbound (Shiloh) Approach		*AM*	*12.4*	*B*	*15.6*	*C*	*16.2*	*C*
			PM	*10.7*	*B*	*17.8*	*C*	*14.5*	*B*
27	Skylane Blvd-Golf Course Dr/Shiloh Rd	Signal	AM	12.6	B	**	**F**	23.8	C
			PM	12.6	B	33.6	C	13.8	B
28	Conde Ln/Shiloh Rd	Signal	AM	15.6	B	19.4	B	20.5	C
			PM	15.6	B	22.9	C	23.0	C
29	Caletti Ave/Shiloh Rd	TWSC	AM	8.1	A	1.9	A	2.3	A
			PM	8.3	A	8.2	A	4.76	A
	Northbound (Caletti) Approach		*AM*	*7.4*	*A*	*26.0*	*D*	*29.5*	*D*
			PM	*7.3*	*A*	***	*F*	*62.3*	*F*
30	Highway 101 South ramps/Shiloh Rd	Signal	AM	6.9	A	6.4	A	6.3	A
			PM	6.9	A	6.8	A	6.8	A

				Scenario					
				Existing Conditions		2040 Cumulative Conditions No Project		2040 Cumulative Conditions with 2040 General Plan	
Number	Study Intersection	Control	Time Period	Delay	LOS	Delay	LOS	Delay	LOS
31	Highway 101 North ramps/Shiloh Rd	Signal	AM	9.5	A	11.2	B	9.0	A
			PM	9.5	A	8.8	A	9.8	A
32	Hembree Ln/Shiloh Rd	Signal	AM	8.3	A	9.3	A	12.6	B
			PM	10.2	B	12.3	B	16.5	B
33	ORH/Shiloh Rd	Signal	AM	18.6	B	**58.4**	**F**	39.8	D
			PM	19.9	B	**	**F**	**	**F**

Notes: Delay is in average seconds per vehicle; LOS = Level of Service; ORH = Old Redwood Highway; TWSC = Two-way stop controls; AWSC = All-way stop controls; RNDBT = Roundabout.

** indicates delay in excess of 120 seconds; **Bold Text** indicates operation below the minimum applied standard; Delay for stop-controlled site street approaches is show in *italics*

Source: W-Trans

The 2040 General Plan contains a number of policies and measures that assist in the reduction of traffic congestion. Relevant policies and implementation programs are listed below:

Policy M-1.1: *Multimodal Transportation System*. The Town shall continue to implement a multimodal transportation system that connects residents to activity centers throughout and near town, such as commercial centers and corridors, employment centers, the SMART train stop, the airport, schools, parks, recreation areas, and other attractions.

Policy M-1.2: *Trip Generation Reduction for Applicable Developments*. The Town shall consider appropriate reductions to the trip generation for projects with a multimodal system approach that increases transit ridership, biking, and walking, in order to reduce air pollution, energy consumption, and greenhouse gas emissions.

Policy M-1.3: *Development of Pedestrian, Bicycle, and Transit Facilities*. The Town shall encourage the development of facilities and services (e.g., secure long-term bicycle parking, street lights, street furniture and trees, transit stop benches and shelters, and street sweeping of bike lanes) that enable bicycling, walking, and transit to become more widely used modes of transportation and recreation.

Policy M-1.4: *Multimodal System Additions*. The Town shall require all new development that proposes or is required to construct or extend streets to develop a transportation network that complements and contributes to the town's multimodal system, maximizes connections, and minimizes barriers to connectivity.

Policy M-2.1: *Complete Streets Design Guidelines*. The Town shall ensure that the concepts and design standards/guidelines in the adopted Complete Street Design Guidelines are considered during review of new development proposals, when constructing new streets, and when modifying existing corridors in order to ensure accessibility for all.

Policy M-2.4: *Managing Transportation in the Right-of-Way*. The Town shall balance the needs of all travel modes when planning transportation improvements, including pedestrian and bicycle trails and pathways.

Policy M-2.7: *Complete Street Priority Areas*. The Town shall prioritize complete streets improvements (e.g., bicycle, pedestrian, vehicle, and transit facilities) at and along U.S. Highway 101 interchanges, including Shiloh Road, Arata Lane, and Central Windsor.

Policy M-3.1: *Connected Network*. The Town shall strive to create a more connected transportation network by eliminating "gaps" in roadways, bikeways, and pedestrian networks; increasing transit access; and removing natural and manmade barriers to accessibility and connectivity.

Policy M-3.12: *Traffic Management*. The Town shall strive to address traffic operations, including congestion, intersection delays, and travel speeds, while balancing neighborhood livability and safety concerns.

Policy M-3.16: *Level of Service Application*. The Town shall maintain level of service standards that define the minimum acceptable operating characteristics for intersections and streets. A level of service D (LOS D) is defined as the minimum acceptable level of congestion during the weekday morning and evening peak periods for high-volume facilities such as freeways, crosstown streets, and signalized or all-way stop-controlled intersections. This standard should apply at all these locations except the following intersections, which are regional gateways to

the Town's commercial and civic areas, and where a Level of Service E is tolerated by the Town and considered acceptable:

- Old Redwood Highway/Highway 101 North off-ramp/Lakewood Drive
- Old Redwood Highway/Highway 101 South ramps
- Old Redwood Highway/Conde Lane/Windsor River Road

At side-street stop-controlled unsignalized intersections, levels of service shall be determined for both controlled movements and for the overall intersection. Controlled movements operating at LOS E or LOS F are allowable if: 1) the intersection is projected to operate at LOS C or better overall, and 2) the projected traffic volume on the controlled movement is 30 vehicles or less per hour on approaches with single lanes, or on multi-lane approaches, 30 vehicles or less per hour per lane. If an intersection is operating at LOS E or F without project-generated traffic added, the project's impact shall be considered less-than-significant if it does not cause operation to fall from LOS E to LOS F and it increases average delay for the intersection as a whole by 5 seconds or less. Level of service standards shall not apply to minor intersections comprised of only local streets.

Policy M-3.25. Full build-out of five-lane boulevards will only occur when necessary to maintain acceptable levels of service along the Town's transportation network. In their interim condition prior to full build-out, the full width necessary to accommodate five-lane boulevards shall be dedicated to the Town; however, the fewest number of lanes necessary to maintain acceptable levels of service will be required and any excess right-of-way may be improved with pedestrian facilities, street parking, bicycle lanes, and parklets.

Policy M-9.3: ***New Transportation Infrastructure Costs***. The Town should identify those transportation infrastructure improvements that are necessary to accommodate future growth envisioned by the General Plan. The cost for providing needed infrastructure should be shared by new development through Traffic Impact Mitigation Fees.

In addition to the above policies and implementation programs, Policy M-3.18 requires the Town to consider the applicability of using transportation performance metrics such as Vehicle Miles Traveled (VMT) and associated thresholds for measuring transportation system impacts. This Policy is implemented by Program M-2, which states that the Town shall review, and update if needed, the General Plan Level of Service standards and policies to be consistent with the California Environmental Quality Act (CEQA) guideline amendments adopted for the implementation of SB 743 (Steinberg, 2013) or other future state legislation.

Although traffic conditions would generally be improved compared to the Cumulative No Project scenario, as shown in Table 38 which summarizes the LOS for the year 2040 Cumulative Conditions with the 2040 General Plan, three intersections would operate below LOS standards for the Town with implementation of the proposed 2040 General Plan. Old Redwood Highway/Starr Road would operate deficiently at LOS F during the morning peak hour under projected 2040 volumes associated with the 2040 General Plan. Similarly, the intersections of Windsor River Road/Bell Road-Market Street and Old Redwood Highway/Shiloh Road would operate at LOS F during the evening peak hour under the 2040 General Plan volumes. The effect of the operation of the SMART train was not included in the analysis of the intersection of Windsor Road/Windsor River Road, though some additional delay will be experienced during train crossings. However, given that the intersection is expected to operate well within the threshold for acceptable service, operation can reasonably be expected to remain at LOS D or better with the delay associated with a limited number of train

crossings per hour added. Because Old Redwood Highway/Starr Road, Windsor River Road/Bell Road-Market Street and Old Redwood Highway/Shiloh Road would operate at an unacceptable LOS standard in the year 2040 with implementation of the 2040 General Plan, impacts are potentially significant and would require mitigation measures to reduce impacts.

Table 38 Future Peak Hour Intersection Levels of Service – Year 2040 Cumulative Conditions with 2040 General Plan

		A.M. Peak Hour		P.M. Peak Hour	
	Study Intersection	**Delay**	**LOS**	**Delay**	**LOS**
1	ORH/ Highway 101 South ramps	15.5	B	27.2	C
2	ORH/Starr Rd	**84.1**	**F**	29.2	C
3	ORH/Arata Ln	22.3	C	21.8	C
4	Highway 101 North ramps/Arata Ln	19.7	B	20.6	C
5	Los Amigos Rd/Arata Ln	54.4	D	19.9	B
6	Brooks Rd-S/Arata Ln	17.9	C	10.3	B
7	Brooks Rd-S/Foothill Dr	13.4	B	9.7	A
8	Hembree Ln/Foothill Dr	12.3	B	9.5	A
9	ORH/Windsor Rd	8.6	A	7.0	A
10	Brooks Rd-S/Glen Miller Dr	6.9	A	8.1	A
11	Brooks Rd-S/Los Amigos Rd	20.3	C	22.4	C
12	Brooks Rd-S/Lakewood Dr	33.6	C	33.7	C
13	Windsor River Rd/Starr Rd	23.3	C	23.2	C
14	Windsor River Rd/Windsor Rd	23.6	C	20.3	C
15	Windsor River Rd/Bell Rd–Market St	11.1	B	****	**F**
16	Windsor River Rd/ORH–Conde Ln	29.1	C	25.7	C
17	Highway 101 South ramps/ORH	31.4	C	24.0	C
18	ORH/ Highway 101 North off-ramp–Lakewood Dr	33.0	C	79.2	E
19	Windsor Rd/Jaguar Wy	7.3	A	8.3	A
20	ORH/Alden Ln	7.4	A	8.5	A
21	ORH /Hembree Ln	17.5	B	18.9	B
22	ORH/Pleasant Ave	11.2	B	7.5	A
23	Windsor Rd/Mitchell Ln	1.5	C	1.8	C
Westbound (Mitchell) Approach		*14.3*	*B*	*14.7*	*B*
24	Conde Ln/Mitchell Ln	11.2	B	10.7	B
25	Hembree Ln/Shiloh Center Dr	16.1	B	17.1	B
26	Windsor Rd/Shiloh Rd	9.9	A	9.83	A
Westbound (Shiloh) Approach		*16.2*	*C*	*14.5*	*B*
27	Skylane Blvd-Golf Course Dr/Shiloh Rd	23.8	C	13.8	B
28	Conde Ln/Shiloh Rd	20.5	C	23.0	C
29	Caletti Ave/Shiloh Rd	2.3	A	4.76	A
Northbound (Caletti) Approach		*29.5*	*D*	*62.3*	*F*
30	Highway 101 South ramps/Shiloh Rd	6.3	A	6.8	A
31	Highway 101 North ramps/Shiloh Rd	9.0	A	9.8	A

Study Intersection	A.M. Peak Hour		P.M. Peak Hour	
	Delay	LOS	Delay	LOS
32 Hembree Ln/Shiloh Rd	12.6	B	16.5	B
33 ORH/Shiloh Rd	39.8	D	**	**F**

Notes: Delay is in average seconds per vehicle; LOS = Level of Service; ORH = Old Redwood Highway
Delay for stop-controlled side-street approaches is shown in *italics,*
** = Delay in excess of 120 seconds; **Bold Text** indicates operation below the minimum applied standard; *Italicized* cells indicate mitigated conditions
Source: W-Trans

Highway 101

Highway 101 segments were not evaluated as part of this analysis because the Environmental Assessment/Final Environmental Impact Report (EA/FEIR) for the Highway 101 HOV Lane Widening and Improvements Project from Steele Lane to Windsor River Road (SCH No. 2003062101) concluded that on the least congested segments in the study area, Highway 101 is expected to operate at a LOS C and B during the morning and evening peak periods respectively under 2030 volumes. Given that the volumes in Windsor are the lowest of any study segments covered in the EA/FEIR, and that these volumes are about half those on the highest volume segment, it is reasonable to conclude that the least impactful service levels are experienced in Windsor. Given that acceptable operation was documented in the adopted EA/FEIR, no further operational analysis of Highway 101 segments was performed because traffic volumes from the 2040 General Plan are not anticipated to significantly increase the impacts or the findings of the EA/EIR. Therefore, this analysis focused on ramp intersections to Highway 101 because ramp intersections are the most critical component in Windsor. The following ramp intersections were individually evaluated: Old Redwood Highway/Highway 101 South ramps, Highway 101 North ramps/Arata Lane, Highway 101 South ramps/ORH, Old Redwood Highway North off-ramp-Lakewood Drive, Highway 101 South ramps/Shiloh Road, and Highway 101 North ramps/Shiloh Road. As shown in Table 37 and Table 38, all LOS impacts to ramp intersections were determined to be less than significant and in fact LOS conditions improve to acceptable levels at the Old Redwood Highway/Highway 101 South ramps and the Highway 101 North ramps/Arata Lane intersections.

Although the 2040 General Plan contains policies and measures intended to reduce traffic in Windsor, because traffic associated with buildout of the 2040 General Plan would result in unacceptable level of service at three intersections as shown in Table 38, impacts would be potentially significant.

Mitigation Measures

The following mitigation measures are required to reduce T-1 Impacts at the study intersections to a less than significant level.

T-1 Intersection Improvements

The following additional intersection improvements are necessary to maintain acceptable operation with the 2040 volumes anticipated under the 2040 General Plan.

- Add a second left-turn lane on northbound **Old Redwood Highway at Starr Road** together with a second receiving lane southbound on Starr Road.
- Add an eastbound left-turn lane on **Windsor River Road at Bell Road-Market Street** to operate under permitted left-turn phasing.

- Provide a second left-turn lane on northbound **Old Redwood Highway at Shiloh Road**; this will require a second westbound lane on Shiloh Road.

The resulting circulation system is shown on the revised Street Classification Map (2040 Conditions) in Figure 21 and the improvements described in Mitigation Measure T-1 would be included as part of the Town's Capital Improvement Program (CIP), Traffic Impact Mitigation Fee program or other infrastructure improvement plan to ensure funding is provided and that implementation of the improvements are made prior to project development occurring in the vicinity of these intersections. The mitigated LOS at each intersection is shown in Table 39. As shown, with mitigation, each intersection would result in an acceptable LOS and thus impacts would be reduced to a less than significant level.

Table 39 Future Mitigated Peak Hour Intersection Levels of Service – Year 2040 Cumulative Conditions with 2040 General Plan

	A.M. Peak Hour		P.M. Peak Hour	
Study Intersection	**Delay**	**LOS**	**Delay**	**LOS**
2 ORH/Starr Rd	**84.1**	**F**	29.2	C
(Mitigated) Dual Left-turn Lanes on NB ORH	26.0	C	21.8	C
15 Windsor River Rd/Bell Rd–Market St	11.1	B	**	**F**
(Mitigated) Add Eastbound Left-turn Lane	9.4	A	10.1	B
33 ORH/Shiloh Rd	39.8	D	**	**F**
(Mitigated) Dual NB Left-turn Lanes	27.4	C	41.4	D

Notes: Delay is in average seconds per vehicle; LOS = Level of Service; ORH = Old Redwood Highway

Delay for stop-controlled side-street approaches is shown in *italics,*

** = Delay in excess of 120 seconds; **Bold Text** indicates operation below the minimum applied standard;

Source: W-Trans

Significance After Mitigation

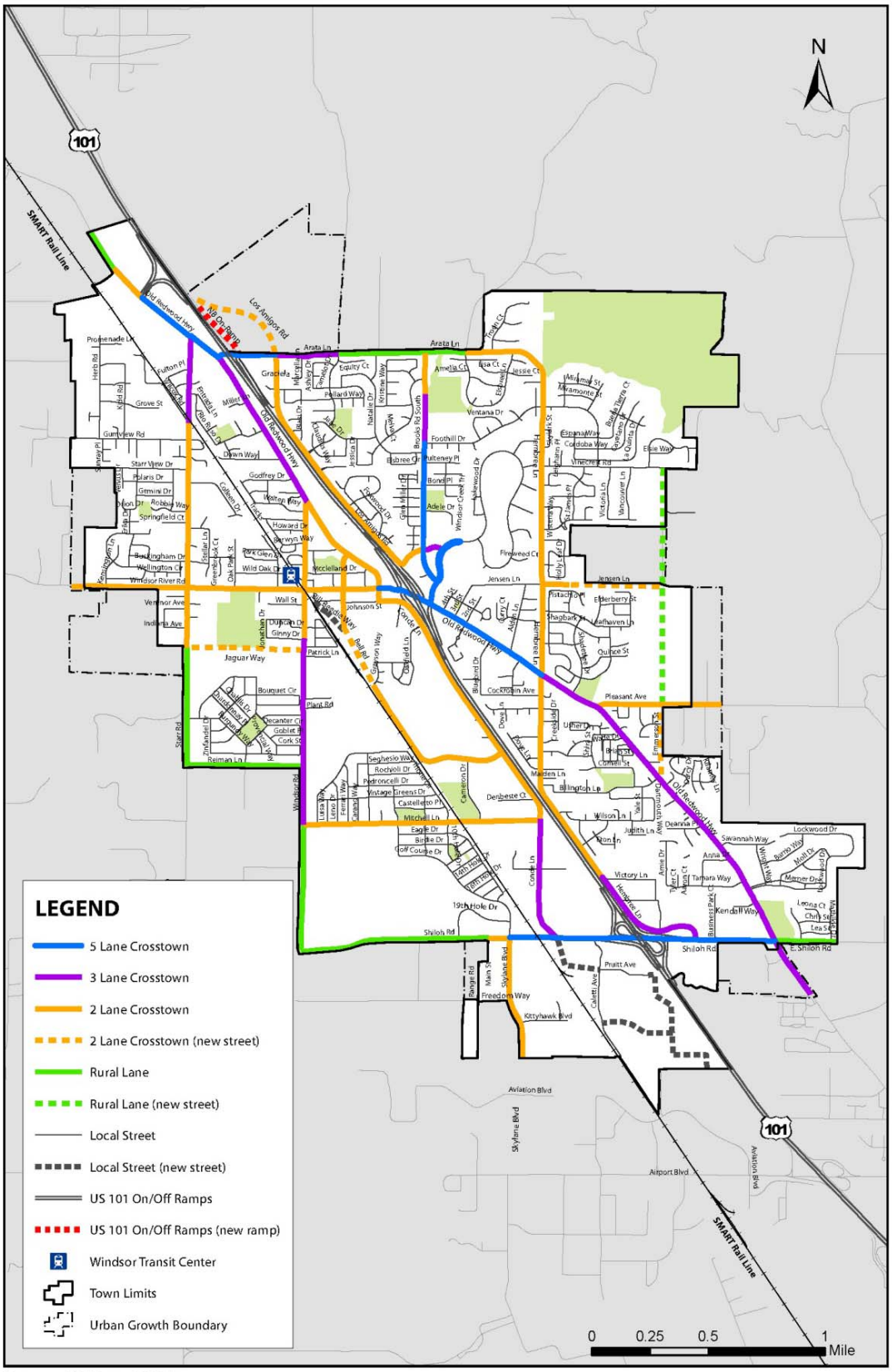
With implementation of Mitigation Measure T-1 impacts at study intersections would be less than significant.

Threshold:	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

IMPACT T-2 THE 2040 GENERAL PLAN WOULD NOT RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS AND WOULD NOT AFFECT THE CHARLES M. SCHULZ- SONOMA COUNTY AIRPORT. IMPACTS TO AIR TRAFFIC PATTERNS WOULD BE LESS THAN SIGNIFICANT.

The Charles M. Shultz Sonoma County Airport (STS) is located just south and outside the Town of Windsor in unincorporated Sonoma County, approximately two miles west of Highway 101. The airport is outside the area governed by the 2040 General Plan. The Town has no existing or planned airport facilities and implementation of the 2040 General Plan would result in no changes to the aircraft operations at STS, including changes within critical approach or departure zones. Development attributable to the General Plan would be expected to result in additional demand for air transportation services, and General Plan Policy M-7.2 requires the Town to promote efficient

Figure 21 Windsor 2040 Circulation System



Source: W-Trans, 2017

ground connections to air transport facilities. However, the growth associated with the 2040 General Plan would not substantially change air traffic patterns, increase air traffic levels, or change the location of an airport that would result in a substantial safety risk. Impacts would be less than significant.

Mitigation Measure

Impacts would be less than significant; therefore, mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Substantially increase traffic-related hazards due to a design feature or incompatible uses.

IMPACT T-3 NEW DEVELOPMENT FACILITATED BY THE 2040 GENERAL PLAN MAY INCREASE TRAFFIC AT CERTAIN LOCATIONS IN WINDSOR. THIS TRAFFIC MAY HAVE THE POTENTIAL TO CAUSE QUEUING THAT EXCEEDS AVAILABLE STORAGE AREA RESULTING IN TRAFFIC RELATED HAZARDS. PROPOSED TRANSPORTATION AND MOBILITY ELEMENT POLICIES WOULD REDUCE MOST IMPACTS TO A LESS THAN SIGNIFICANT LEVEL. HOWEVER, QUEUING BEYOND ACCEPTABLE LEVELS AT CERTAIN INTERSECTIONS WOULD STILL OCCUR AND MAY RESULT IN TRAFFIC HAZARDS; THEREFORE, IMPACTS WOULD BE SIGNIFICANT.

In addition to the intersections discussed above in Impact T-1, analysis was performed to ensure that the left-turn lanes at the study intersections would be of adequate length to accommodate projected 95th percentile queues. Those locations where queuing is expected to result in stacking into the through lane are summarized in Table 40. Policy M-3.17 (as listed below) of the 2040 General Plan, as applied in Figure 21 includes criteria for assessing traffic-related hazards related to vehicle queuing. In addition, the draft General Plan contains several policies intended to ensure that both existing and new facilities are operated in such a way as to avoid introducing hazards, including the following:

Policy M-2.3: ***Safe and Comfortable Streets***. The Town shall design streets to enhance Windsor's identity, to be safe and convey a sense of security, and to be comfortable and convenient for all travel modes including motor vehicles, pedestrians, and bicyclists.

Policy M-3.13: *Slowing Residential Traffic.* *The Town shall "calm", or slow, traffic in residential neighborhoods through application of* a variety of techniques that have the effect of slowing through traffic without compromising safety, emergency access, and reasonable flows as presented in the Town's Neighborhood and Traffic Management Calming Program.

Policy M-3.14: ***Traffic Calming***. The Town shall implement traffic calming measures in the downtown and accident prone hotspot locations, as well as near schools, the library, and other public facilities, as appropriate to improve safety.

Policy M-3.17: *Queuing*. Intersection queuing shall be evaluated in tandem with LOS to ensure that projected 95th percentile queues in left-turn pockets do not exceed the available stacking length. A queuing impact shall be considered significant if:

a) The 95th percentile queue length can be contained within the available stacking length without the project, and the project causes the queue to exceed the stacking length; or

b) The queue length exceeds the available stacking length without the project and the project increases the 95th percentile queue by more than 10 feet, or approximately one-half a car-length.

Exceptions to Policy M-3.17 may be granted by the Town Engineer, where there is insufficient block length to accommodate projected queuing or physical constraints that make it infeasible to construct the improvements that would be necessary to achieve adequate stacking length, such as geometrics, lack of right-of-way, adjacent slopes or hills, and soil conditions.

Table 40 Locations Where Queuing Exceeds Storage Capacity

Study Intersection	Storage Capacity	A.M. Peak Queue	P.M. Peak Queue
2. Old Redwood Highway/Starr Road			
Northbound Left-turn	300	**1,229**	270
With Dual Left-turn Lanes	*300*	*173*	*101*
4. US 101 North Ramps/Arata Lane			
Eastbound Left-turn	100	**229**	**110**
5. Los Amigos Road/Arata Lane			
Eastbound Left-turn	100	**210**	**270**
11. Brooks Road (South)/Los Amigos Road			
Westbound Left-turn	75	71	**85**
14. Windsor River Road/Windsor Road			
Eastbound Left-turn	50	**83**	**71**
Westbound Left-turn	200	128	**708**
16. Old Redwood Hwy-Conde Ln/Windsor River Rd			
Westbound Left-turn	200	**264**	**324**
17. US 101 South/Old Redwood Highway			
Westbound Left-turn	400	**639**	**500**
18. US 101 North-Lakewood Dr/Old Redwood Hwy			
Southbound Left-turn	180	154	**570**
25. Hembree Lane/Shiloh Center Drive			
Southbound Left-turn	175	55	**193**
27. Skylane Boulevard/Shiloh Road			
Southbound Left-turn	50	**103**	39
29. Shiloh Road/Caletti Avenue			
Westbound Left-turn	75	**100**	**125**
33. Old Redwood Highway/Shiloh Road			
Northbound Left-turn	200	**357**	**
With Dual Left-turn Lanes	*300*	*118*	*291*

Notes: Results represent 95th percentile queue in feet; **bolded numbers** indicate a significant impact, Vitalized rows indicate conditions with additional lanes per Mitigation Measure T-2; ** indicates results exceeding 1,500 feet

Source: W-Trans

Although the 2040 General Plan contains policies and measures intended to reduce traffic hazards, traffic associated with buildout of the 2040 General Plan may have the potential to cause queuing on Windsor intersections that exceeds available storage area resulting in traffic related hazards as shown in Table 40. Queuing that exceeds available storage areas may result in an increase likelihood of vehicle accidents either approaching or within intersections and/or result in conflicts and safety hazards between motorists and pedestrians utilizing crosswalks or bicyclists in bike lanes or sharing traffic lanes. Impacts would be significant.

Mitigation Measures

The following mitigation measures are required to reduce T-4 Impacts to the extent feasible.

T-2 Queuing Improvements

The following improvements are necessary to mitigate impacts from queuing based on the traffic volumes anticipated under the 2040 General Plan.

- Provide dual left-turn lanes on northbound **Old Redwood Highway at Starr Road** per Mitigation Measure T-1.
- Provide at least 250 feet of stacking space on the eastbound approach to **Highway 101 North ramps/Arata Lane** when the interchange is modified to provide all of the travel lanes needed to accommodate future volumes.
- Widen **Arata Lane** to provide at least 275 feet of stacking space for the left-turn pocket on the eastbound approach to Los Amigos Road.
- Limit access at **Windsor River Road/Bill Beedie Way** to right turns in/out only and extend the left-turn pocket to 700 feet or convert **Windsor River Road/Windsor Road** to a modern roundabout.
- Lengthen the left-turn lane on the north-bound **Old Redwood Highway** approach to Conde Lane to 325 feet.
- Lengthen the left-turn pocket on the southbound approach to **Shiloh Road** at **Skylane Boulevard** to 125 feet.
- Lengthen the left-turn pocket on westbound **Shiloh Road at Caletti Avenue** to 125 feet.
- Provide dual left-turn lanes with at least 300 feet of stacking space on northbound **Old Redwood Highway at Shiloh Road**.

Significance After Mitigation

With mitigation, queuing in left-turn pockets at the majority of intersections identified in Table 40 would be improved to less than significant levels. However, there are no viable options for achieving adequate stacking space at the following locations due to proximity to another intersection or other limitations on geometrics, so the impact would remain significant and unavoidable.

- Brooks Road (South)/Los Amigos Road westbound approach
- Old Redwood Highway/US 101 South northwestbound (Old Redwood Highway) approach
- Old Redwood Highway/US 101 North Off-ramp-Lakewood Drive southbound (Lakewood Drive) approach
- Hembree Lane/Shiloh Center Drive

Threshold:	A project has a significant environmental impact on traffic if it would result in inadequate emergency access.

IMPACT T-4 DUE TO THE PROGRAMMATIC NATURE OF THE 2040 GENERAL PLAN, AND THE PROPOSED POLICIES AND IMPLEMENTATION MEASURES TO CREATE AN INTEGRATED, MULTI-MODAL TRANSPORTATION SYSTEM, THE 2040 GENERAL PLAN WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The 2040 General Plan does not propose specific development projects, therefore does not propose any developments that could result in inadequate emergency access. Traffic will increase with the buildout of the 2040 General Plan leading to increased congestion as discussed above in Impact T-1 and T-4, but this would not result in inadequate emergency access. The purpose of the 2040 General Plan in terms of transportation is to improve the overall performance of the transportation network for all modes of transportation. The following General Plan policies would ensure that the development associated with the 2040 General Plan would not result in inadequate emergency access:

> **Policy M-3.13:** ***Slowing Residential Traffic.*** *The Town shall "calm", or slow, traffic in residential neighborhoods through application of* a variety of techniques that have the effect of slowing through traffic without compromising safety, emergency access, and reasonable flows as presented in the Town's Neighborhood and Traffic Management Calming Program.
>
> **Policy M-3.21:** ***Emergency Access on Streets*****.** The Town shall work with the Fire District to address street design and the accessibility required for emergency vehicles, with the Town's desire for narrower pedestrian-friendly streets.

With implementation of the policies above, future projects would be assessed to ensure they result in adequate emergency access. In addition, mandatory Town development processes also require project review by emergency services, including police and fire, to ensure projects maintain adequate emergency access. This impact would be less than significant.

Mitigation Measure

Mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

IMPACT T-5 THE FOCUS OF THE PROPOSED 2040 GENERAL PLAN IN TERMS OF TRANSPORTATION IS TO ADDRESS A BALANCED TRANSPORTATION NETWORK THAT WILL SUPPORT AND ENCOURAGE WALKING, BICYCLING, AND TRANSIT RIDERSHIP; CONSERVE ENERGY RESOURCES; AND REDUCE GREENHOUSE GAS EMISSIONS, WHILE CONTINUING TO ACCOMMODATE AUTOMOBILE TRAVEL. THE 2040 GENERAL PLAN THEREFORE WOULD NOT CONFLICT WITH ADOPTED POLICIES RELATING TO ALTERNATIVE TRANSPORTATION MODES, INCLUDING TRANSIT, WALKING, AND BICYCLING. PROPOSED TOWN OF WINDSOR TRANSPORTATION AND MOBILITY ELEMENT POLICIES WOULD REDUCE THESE IMPACTS TO A LESS THAN SIGNIFICANT LEVEL.

The 2040 General Plan Transportation and Mobility Element includes a number of policies and implementation programs to ensure acceptable access for all modes of travel. These policies and programs would enhance the Town's alternative transportation modes while continuing to accommodate automobile travel. For example, the following policies would enhance multimodal transportation and complete streets in the Town:

Policy M-1.1: ***Multimodal Transportation System*****.** The Town shall continue to implement a multimodal transportation system that connects residents to activity centers throughout and near town, such as commercial centers and corridors, employment centers, the SMART train stop, the airport, schools, parks, recreation areas, and other attractions.

Policy M-1.3: ***Development of Pedestrian, Bicycle, and Transit Facilities*****.** The Town shall encourage the development of facilities and services (e.g., secure long-term bicycle parking, street lights, street furniture and trees, transit stop benches and shelters, and street sweeping of bike lanes) that enable bicycling, walking, and transit to become more widely used modes of transportation and recreation, particularly in the Downtown area and near the Windsor train station.

Implementation Program M-5: ***Complete Street Design Guidelines*****.** The Town shall review and update the Complete Street Design Guidelines every five years.

Policy M-2.4: ***Managing Transportation in the Right-of-Way*****.** The Town shall balance the needs of all travel modes when planning transportation improvements, including pedestrian and bicycle lanes, trails, and pathways.

Implementation Program M-6: ***Underused Rights-of-Way*****.** The Town shall conduct a study to identify underused rights-of-way, such as street lanes, open drainage facilities, and railroad corridors, to convert to bikeways, sidewalks, trails, and/or landscaping improvements. Based on findings from the study, the Town shall prepare and submit recommendations to the Town Council recommended on priorities to maximize the use of underused right-of-way for non-motorized facilities or landscaping improvements.

Policy M-2.5: ***Complete Street Infrastructure*****.** The Town shall incorporate appropriate complete street infrastructure, including technologies supporting automated vehicle travel as industry standards are developed and facilities supporting increased use of "on-demand" car-sharing and ride-sharing services, into transportation planning, funding, design, approval, and implementation processes and projects.

Policy M-2.7: *Complete Street Priority Areas*. The Town shall prioritize complete streets improvements (e.g., bicycle, pedestrian, vehicle, and transit facilities) at and along U.S. Highway 101 interchanges, including Shiloh Road, Arata Lane, and Central Windsor.

Implementation Program M-4: *Prioritizing Complete Street Upgrades*. The Town shall conduct a study of the existing street network to identify streets that would benefit from multimodal improvements, including identification of gaps and barriers in the transportation and transit networks. Based on findings from the study, the Town shall prepare and submit recommendations to the Town Council on a priority list of complete streets improvements.

Policy M-2.9: *Multimodal Level of Service*. The Town shall consider applying a multimodal level of service standard in Windsor.

Implementation Program M-1: *Multimodal Level of Service Study*. The Town shall study the suitability of adopting a multimodal Level of Service (LOS) standard in Windsor. If deemed suitable, the Town shall consider amending the LOS standards described in Policy M-3.18 to include pedestrian, bicycle, and transit modes where deemed applicable.

Policy M-3.1: *Connected Network*. The Town shall strive to create a more connected transportation network by eliminating "gaps" in roadways, bikeways, and pedestrian networks; increasing transit access; and removing natural and manmade barriers to accessibility and connectivity.

Policy M-3.25. Full build-out of five-lane boulevards will only occur when necessary to maintain acceptable levels of service along the Town's transportation network. In their interim condition prior to full build-out, the full width necessary to accommodate five-lane boulevards shall be dedicated to the Town; however, the fewest number of lanes necessary to maintain acceptable levels of service will be required and any excess right-of-way may be improved with pedestrian facilities, street parking, bicycle lanes, and parklets.

The following **policies** would **promote active transportation** by addressing **safety concerns:**

Policy M-2.3: *Safe and Comfortable Streets*. The Town shall design streets to enhance Windsor's identity, to be safe and convey a sense of security, and to be comfortable and convenient for all travel modes including motor vehicles, pedestrians, and bicyclists.

Policy M-3.12: *Traffic Management*. The Town shall strive to address traffic operations, including congestion, intersection delays, and travel speeds, while balancing neighborhood livability and safety concerns.

The following policies would enhance bicycle and pedestrian transportation opportunities:

Policy M-4.1: *Bicycle and Pedestrian Master Plan*. The Town shall regularly update and implement the Windsor Bicycle and Pedestrian Master Plan.

Implementation Program M-11: *Windsor Bicycle and Pedestrian Master Plan*. The Town shall review and update the Windsor Bicycle and Pedestrian Master Plan every five years to ensure adequate facilities that are meeting demand.

Policy M-4.2: *Trail Network*. The Town shall expand its network of trails throughout the town, wherever feasible, through public open spaces and easements for recreational enjoyment and for a vehicle-free route to parks, schools, and neighborhoods through walled subdivisions.

Policy M-4.4: *Pedestrian and Bicycling Gaps*. The Town shall encourage closing the gaps in the sidewalk and bicycling network to ensure continuous pedestrian and cycling access within town, particularly the gaps in connection due to the bisecting of U.S. Highway 101.

Implementation Program M-10: *Sidewalk Maintenance and Repair Program*. The Town shall adopt and implement a Sidewalk Maintenance and Repair Program to ensure adequate and safe pedestrian travel.

Policy M-4.12: *Safe Routes to School*. The Town shall continue to coordinate with the School District on implementation of the Safe Routes to School program to ensure a safe pedestrian and bicycling network to and from local educational facilities.

Implementation Program M-12: *Windsor Safe Routes to School*. The Town shall work with staff at all schools within the town to implement the suggested strategies and improvements identified in the Windsor Safe Routes to School Program.

The following policies would enhance regional transit for the Town of Windsor:

Policy M-4.13: *SMART Trail*. The Town shall work with Sonoma Marin Area Rail Transit on the implementation of the SMART Trail which will extend a multi-use path adjacent to the SMART corridor, connecting bicyclists and pedestrians north and south from the multi-modal transit station into neighboring jurisdictions.

Policy M-5.2: *Expansion of Bus Service*. The Town shall support expansion of local bus service through Sonoma County Transit, consistent with funding resources, to link residences with key local destinations, such as employment centers and the airport, and shall support the continuation of paratransit service to satisfy needs of qualified users.

Implementation and adherence to the policies and implementation programs contained within the 2040 General Plan would result in a less than significant impact as they would improve performance of the transportation system for all users.

Mitigation Measure

Impacts would be less than significant; therefore, mitigation is not required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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4.15 Utilities and Service Systems

This section evaluates potential effects on utilities related to implementation of the proposed project by identifying anticipated demands and existing and planned service availability. For purposes of this EIR, utilities consist of (1) water supply; (2) wastewater; (3) storm drain facilities; and (4) solid waste.

4.15.1 Setting

Water Supply

The Windsor Water District (WWD) owns and operates the Town's potable water system, which includes pumping and treatment of over 1.3 billion gallons annually. Windsor has over 140 miles of distribution mains and over 5 million gallons of water storage in 16 storage tanks. The Town's potable water supply is provided primarily from its wells in the Russian River Well Field, through a Sonoma County Water Agency (SCWA) Russian River water right, and a connection to the SCWA's aqueduct from which the Town purchases wholesale water. The WWD owns five off-river groundwater wells that provide a raw water supply source. The Town's projected water supply and demand from 2020 through 2040 is shown in Table 41 below. One of the five wells, the Esposti irrigation well, is active and the remaining four wells are inactive. The Town is a leader in the use of recycled water for irrigation of agricultural fields, recreational facilities, and landscaping in select residential neighborhoods. The Town also provides recycled water delivery to the Geysers Geothermal fields.

Table 41 Town of Windsor Projected Future Water Use (Acre Feet per Year)

	2020	2025	2030	2035	2040
Water Supply	5,978	6,087	6,427	6,427	6,427
Water Demand	4,605	4,611	4,615	4,700	4,809
Projected Difference	1,373	1,476	1,812	1,727	1,618

Source: Final 2015 Urban Water Management Plan 2016

Wastewater Collection and Treatment

The WWD owns, operates, and maintains a wastewater collection system that includes approximately 92 miles of public branch and trunk sewers, 1,728 manholes, 679 cleanouts, and approximately 7,600 private service laterals throughout the town. Existing pipelines range in diameter from 4-inches to 42-inches, and include two siphons located at Los Amigos and Rio Russo. In addition, the WWD owns and operates two lift stations located at Vintage Greens and Shiloh Greens since the recent decommissioning of the Deer Creek Lift Station, and a 7.2 million gallon per day (mgd) water reclamation facility located between Windsor Road and the Northwestern Pacific Railroad, north of Reiman Lane. The current Average Dry Weather Flow (ADWF) seen at the water reclamation facility is 1.4 mgd. Construction of Windsor's original wastewater collection system, including the North Trunk Sewer, was completed in 1964. Other trunk sewers were constructed in 1970 (South Trunk Sewer), and in the late 1980s (Conde, Hembree, Brooks, and Los Amigos Trunk Sewers). The Water Reclamation Division is responsible for the treatment, storage and disposal of the Town's wastewater. The Windsor wastewater treatment facility provides tertiary treatment and

ultraviolet light disinfection and has an average dry-weather design capacity of 2.25 mgd. Approximately 350 million gallons of treated effluent is disposed through land discharge (irrigation of farm lands) and 300 million gallons through creek discharge, annually.

Solid Waste

The Town, through its franchise hauler, provides solid waste, recycling, and composting services for residential, commercial, and industrial areas, with weekly curbside pickup. Hazardous waste collection and disposal is provided by the Sonoma County Waste Management Agency. Currently (2016) all waste is disposed at the Healdsburg Transfer Station before processing. Estimated total solid waste from the Town of Windsor in 2013 was 10,575.71 tons, total recycling was 4,787.30 tons, and total green waste was 5,291.99 tons (Town of Windsor 2015a).

Two annual community cleanup events are provided to residential subscribers of Windsor Refuse and Recycling. The events are held in the spring and fall and are usually held at the Town of Windsor Public Works Corporation Yard located at 8400 Windsor Road across from Windsor High School.

Storm Water

The Town of Windsor does not operate a separate drainage system that treats storm water. Instead, runoff from impervious surfaces is channeled directly into local creeks that ultimately drain into the Russian River. The major creeks in the General Plan Area are Windsor Creek, East Windsor Creek, Pool Creek, Pruitt Creek, Airport Creek, Gumview Creek, and Starr Creek. In an effort to reduce runoff and water quality impacts to the waterways, the Town encourages, through existing General Plan policies, Low Impact Development (LID) and Best Management Practices (BMPs) as mitigation, in addition to required compliance with their National Pollutant Discharge Elimination System (NPDES) permit, SWRCB Order No. 99-08-DWQ, discussed under the regulatory setting below.

Regulatory Setting

Water Quality

Clean Water Act

The primary goals of the Federal Clean Water Act, 33 USC §§ 1251, *et seq*. (CWA) are to restore and maintain the chemical, physical, and biological integrity of the nation's waters and to make all surface waters fishable and swimmable. The CWA forms the basic national framework for the management of water quality and the control of pollutant discharges. The CWA sets forth a number of objectives in order to achieve the above- mentioned goals. The CWA objectives include regulating pollutant and toxic pollutant discharges; providing for water quality which protects and fosters the propagation of fish, shellfish and wildlife; developing waste treatment management plans; and developing and implementing programs for the control of non-point sources pollution.

Porter-Cologne Water Quality Control Act (California Water Code)

The State of California is authorized to administer Federal or State laws regulating water pollution within the State. The Porter-Cologne Water Quality Control Act (Water Code §§ 13000, *et seq*.) includes provisions to address requirements of the CWA. These provisions include NPDES permitting, dredge and fill programs, and civil and administrative penalties. The Porter-Cologne Act is broad in scope and addresses issues relating to the conservation, control, and utilization of the

water resources of the State. Additionally, the Porter-Cologne Act states that the quality of all the waters of the State (including groundwater and surface water) must be protected for the use and enjoyment by the people of the State.

California Department of Water Resources

The California Department of Water Resources is responsible for preparing and updating the California Water Plan, which is a policy document that guides the development and management of State water resources. The plan is updated every five years to reflect changes in resources and urban, agricultural, and environmental water demands. The California Water Plan suggests ways of managing demand and augmenting supply to balance water supply with demand.

California Water Code

The California Water Code, a section of the California Code of Regulations, is the governing law for all aspects of water management in California.

Cortese-Knox-Hertzberg Governmental Reorganization Act of 2000

The Cortese-Knox-Hertzberg Governmental Reorganization Act of 2000 requires each California Local Agency Formation Commission (LAFCO) to conduct municipal service reviews for specified public agencies under their jurisdiction. One aspect of municipal service review is to evaluate an agency's ability to provide public services within its ultimate service area. A municipal service review is required before an agency can update its sphere of influence.

Senate Bills 610 and 221, Water Supply Assessment and Verification

Senate Bills (SB) 610 and 221 amended State law, effective January 1, 2002, to improve the link between the information on water supply availability and certain land use decisions made by cities and counties. Both statutes require detailed information regarding water availability to be provided to city and county decision-makers prior to approval of specified large (greater than 500 dwelling units or 500,000 square feet of commercial space) development projects. Both statutes also require this detailed information to be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Under SB 610 water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects as defined in Water Code 10912 subject to the California Environmental Quality Act (CEQA). Under SB 221 approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply.

Senate Bill 7x7 Statewide Water Conservation

SB 7x7 is part of statutes passed in 2009 addressing water conservation. In general SB 7x7 requires a 20 percent reduction in per capita urban water use by 2020, with an interim 10 percent target in 2015. The law requires urban water users to develop consistent water use targets and to use those targets in their UWMPs.

CALGreen Compliance

CALGreen is California's first green building code and first in the nation state-mandated green building code. It is formally known as the California Green Building Standards Code, Title 24, Part 11, of the California Code of Regulations. CALGreen also specifies requirements for applications

regulated by the California Building Standards Commission (BSC), California Energy Commission (CEC), Division of the State Architect (DSA), Department of Public Health (CDPH), Office of Statewide Health Planning and Development (OSHPD), and the Department of Water Resources (DWR). Consistent with other parts of Title 24, the Matrix Adoption Tables at the front of each chapter are to assist the code user to determine which sections or chapters are applicable to buildings under the authority of a specific State agency; however, they are for information only and are not considered regulatory.

The purpose of CALGreen is to improve public health, safety, and general welfare through enhanced design and construction of buildings using concepts which reduce negative impacts and promote those principles which have a positive environmental impact and encourage sustainable construction practices including water efficiency and conservation, and environmental quality.

Town of Windsor Water Master Plan Update

The Town of Windsor has a Water Master Plan and a Water Conservation Program that regulates their use and collection of water. The Water Master Plan was updated in September 2011. The Town of Windsor's Water Conservation Program provides residents and businesses with in-depth services, education, and guidance about how to manage water wisely. Programs offered by the Town to incentivize water conservation include Windsor Efficiency PAYS, Windsor L2L Greywater Program, Qualified Water Efficient Landscaper (QWEL), in addition to the Sonoma County Energy Independence Office (EIO) that helps Sonoma County's residential and commercial property owners and tenants save energy and water and install renewable energy sources such as solar panels.

Town of Windsor Water and Wastewater Capacity Fee Study

The Capacity Fee Study was completed by the Town of Windsor and the WWD in February 2017 to assist the Town with updating wastewater and water capacity fees. Capacity fees are one-time fees charged for water use based on a tiered fee structure and new service connections to the Town's wastewater collection, treatment, and disposal system. The fees are intended to reflect the estimated reasonable cost of capacity in the system; the fee revenue is used to help pay for the capacity needed to serve new development.

Wastewater

Title 22 of California Code of Regulations

Title 22 regulates the use of reclaimed wastewater. In most cases only disinfected tertiary water may be used on food crops where the recycled water would come into contact with the edible portion of the crop. Disinfected secondary treatment may be used for food crops where the edible portion is produced below ground and will not come into contact with the secondary effluent. Lesser levels of treatment are required for other types of crops, such as orchards, vineyards, and fiber crops.

Sonoma County Health Code

Chapter 24, Article IV of the County Health Code contains wastewater discharge regulations that set uniform requirements for discharges into the wastewater collection and treatment system and enable the agency to comply with the administrative provisions of the clean water grant regulations, the water quality requirements set by the Regional Water Quality Control Board and the applicable

effluent standards, and any other discharge criteria which are required or authorized by state or federal law, and to derive the maximum public benefit by regulating the quality and quantity of wastewater discharged into those systems.

Code of the Town of Windsor[6]

The Windsor Water District Code is Title XII under the Code of the Town of Windsor, Title XII, Chapter 4 provides for the prevention of illicit discharges into its wastewater collection system, limiting the discharge of fats, oils, and grease (FOG) and other debris that may cause blockages, and enforcement of any violation of its sewer ordinances.

Town of Windsor Sewer System Management Plan (SSMP), 2015 Update

The SSMP focuses proper management, operation, and maintenance of all parts of the sanitary sewer system to help reduce and prevent sanitary sewer overflows (SSOs), as well as mitigate any SSOs that do occur. The goals of the Town of Windsor SSMP are to:

- Work cooperatively with local, state, and federal agencies to investigate the causes of, minimize, and mitigate the impacts of SSOs;
- Meet all applicable regulatory notification and reporting requirements;
- Be available and responsive to the needs of the public to prevent and restore interruptions in service, and to minimize public health and property impacts related to SSOs;
- Implement regular, proactive maintenance of the system to remove and control roots, debris, and fats, oils and grease (FOG) that may cause SSOs;
- Maintain adequate capacity to convey peak wastewater flows;
- Prioritize renewal and replacement of wastewater collection system facilities to maximize their useful life and optimize capital expenditures;
- Incorporate many of the requirements of the Settlement Agreement between the Town of Windsor and River Watch under this SSMP Update with a subsequent goal of incorporating the balance of the requirements under the next SSMP Update; and
- Maintain the SSMP, which will serve as a reference for the Town's sanitary sewer system management practices (Town of Windsor 2015b).

Solid Waste

Title 40 of the CFR

Title 40 of the Code of Federal Regulations (CFR), Part 258 (Resource Conservation and Recovery Act RCRA, Subtitle D), contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the Federal landfill criteria.

[6] Windsor Water District Code

Assembly Bill (AB) 341

The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste to recycling efforts and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. In addition to Mandatory Commercial Recycling, AB 341 sets a statewide goal for 75 percent disposal reduction by the year 2020.

Assembly Bill (AB) 939

Assembly Bill 939 (AB 939) (Public Resources Code 41780) requires cities and counties to prepare integrated waste management plans (IWMPs) and to divert 50 percent of solid waste from landfills beginning in calendar year 2000 and each year thereafter. AB 939 also requires cities and counties to prepare Source Reduction and Recycling Elements (SRRE) as part of the IWMP. These elements are designed to develop recycling services to achieve diversion goals, stimulate local recycling in manufacturing, and stimulate the purchase of recycled products.

Senate Bill (SB) 1016

Senate Bill (SB) 1016 requires that the 50 percent solid waste diversion requirement established by AB 939 be expressed in pounds per person per day. SB 1016 changed the CalRecycle review process for each municipality's integrated waste management plan. After an initial determination of diversion requirements in 2006 and establishing diversion rates for subsequent calendar years, the Board reviews a jurisdiction's diversion rate compliance in accordance with a specified schedule. Beginning January 1, 2018, the Board will be required to review a jurisdiction's source reduction and recycling element and hazardous waste element once every two years.

Storm Water

Storm Water Discharge Permits

The SWRCB has issued a statewide NPDES General Permit for storm water discharges associated with construction activities, known as the Construction General Permit (SWRCB Order No. 99-08-DWQ). Any project that disturbs an area more than one acre requires a Notice of Intent (NOI) to discharge under the Construction General Permit. The Construction General Permit includes measures to eliminate or reduce pollutant discharges through implementation of a Storm Water Pollution Prevention Plan (SWPPP), which describes the implementation and maintenance of best management practices (BMPs) to reduce or eliminate pollutants in storm water discharges and authorized non-storm water discharges from the site during construction. The Construction General Permit contains limitations on runoff volumes to prevent storm water from causing or contributing to a violation of any applicable water quality standard. The permit also requires implementation of programs for visual inspections and sampling for specified constituents (e.g., non-visible pollutants). Any construction activities in the General Plan Area that disturb more than one acre would be covered under the Construction General Permit. The Town has two storm water discharge permits: a storm water discharge permit (MS4 permit) for the Town that includes that Corporation Yard, and an industrial storm water permit for the Windsor Water Treatment Plan site. The most recent NPDES permit for Town of Windsor became effective on January 6, 2016 and will expire on January 5, 2021.

The WWD also has an individual industrial storm water discharge permit for the Windsor Water Treatment Plant site. The most recent NPDES permit for the Water Treatment Plan became effective

on February 1, 2014 and will expire on January 31, 2019 (California Regional Water Quality Control Board 2013).

Municipal Storm Water Permitting Program

The Municipal Storm Water Permitting Program regulates storm water discharges from municipal separate storm sewer systems (MS4s). MS4 permits were issued in two phases. Under Phase I, which started in 1990, the Regional Water Quality Control Boards have adopted NPDES storm water permits for medium (serving between 100,000 and 250,000 people) and large (serving 250,000 people) municipalities. Most of these permits are issued to a group of co-permittees encompassing an entire metropolitan area. Windsor joined the Phase I MS4 permittees in the Santa Rosa area under their Phase I permit. The Phase I MS4 permits require the discharger to develop and implement a Storm Water Management Plan/Program with the goal of reducing the discharge of pollutants to the maximum extent practicable (MEP). MEP is the performance standard specified in Section 402(p) of the Clean Water Act. The management programs specify what BMPs will be used to address certain program areas. The program areas include: public education and outreach; illicit discharge detection and elimination; construction and post-construction; and good housekeeping for municipal operations. In general, medium and large municipalities are required to conduct monitoring.

4.15.2 Impact Analysis

Methodology and Significance Thresholds

The proposed project would have a significant effect on water supplies, wastewater, solid waste, or storm water conveyance if demand associated with projected growth would result in any of the following conditions, as listed in Appendix G of the *State CEQA Guidelines*:

1 Require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects

2 Fail to have sufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements

3 Exceed the wastewater treatment requirements of the applicable Regional Water Quality Control Board

4 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

5 Result in a determination that the wastewater treatment provider does not have adequate capacity to serve projected demand in addition to existing commitments

6 Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs

7 Fail to comply with federal, state, and local statutes and regulations related to solid waste

8 Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects

Project Impacts and Mitigation Measures

Threshold:	Require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects or fail to have sufficient water supplies available to serve the project from existing entitlements and resources, or require new or expanded entitlements.

IMPACT UTL-1 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD INCREASE DEMAND FOR WATER SUPPLY. HOWEVER, WITH ADHERENCE TO 2040 GENERAL PLAN POLICIES THE TOWN WOULD HAVE ADEQUATE WATER SUPPLIES TO SUPPORT NEW DEVELOPMENT ANTICIPATED IN THE 2040 GENERAL PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Per the 2015 Town of Windsor Urban Water Management Plan (UWMP) (Town of Windsor 2016b), the Town has enough water supply capacity to meet current demands. The plan projects usage out to 2040, the same year as the General Plan horizon. From 2020 to 2040 the plan predicts that there will be adequate supply to meet water demand in a normal year. Projected water use in a normal year for the Town of Windsor in 2040 is 4,809 acre feet per year (AFY) and future water storage is predicted to be 6,427 AFY. The supply totals include Russian River supplies, a reasonable yield assumption from the Town's off-river wells, and recycled water for potable offset. The Town's potable water supply is anticipated to increase by 2030 because two new off-river wells would be able to supply the Town with additional potable water. The Esposti well is currently being developed and considered as treatment and a second well, the North Windsor Well, will likely be drilled in the future. In addition, the distribution capability of the recycled water system is expected to increase by 2025 and again by 2030, creating more potable water for the Town to meet the growing demand (Town of Windsor 2016b). Therefore, based on the Town's plan to increase the groundwater supply by 2030 and further develop recycled water use for potable offsets, the Town's projected water supply exceeds projected demands through the year 2040. In addition, Town General Plan goals and policies, as discussed below, require new development to have a water supply and infrastructure in place in order to be approved.

Utilities and Service Systems Element Goals and Policies

Goal PFS-1: General Public Facilities and Services. Ensure the provision of adequate and efficient facilities and services that maintain service levels, are adequately funded, accessible, reliable, and strategically allocated.

Policy PFS-1.1: *Capital Improvement Program*. The Town shall maintain the Capital Improvement Program (CIP) to ensure the implementation of the General Plan and the adequate and timely provision of public facility and municipal utility improvements.

Policy PFS-1.2: *High-Quality Service*. The Town shall continue to offer professional, high-quality service that meets the needs of residents and businesses.

Policy PFS-1.5: *Sustainable Practices*. The Town shall serve as a role model to businesses and institutions regarding purchasing decisions that minimize the generation of waste, recycling programs that reduce waste, energy efficiency and conservation practices that reduce water, electricity and natural gas use, and fleet operations that reduce gasoline consumption.

Policy PFS-1.7: *Priority for Infrastructure.* The Town shall give high priority in capital improvement programming to funding rehabilitation or replacement of critical infrastructure that has reached the end of its useful life or has capacity constraints.

Goal PFS-2: Water System. Maintain the Town's water system in order to adequately serve existing residents, businesses, and future development.

Policy PFS-2.1: *Water Master Plan*. The Town shall continue to maintain, implement and periodically update the Master Plan to ensure the reliability and efficiency of the Town's water distribution system.

Policy PFS-2.2: *Urban Water Management Plan.* The Town shall maintain the Urban Water Management Plan to adequately estimate projected water demands and supplies over the planning horizon for average and drought year conditions; and shall implement water supply projects to provide for a reliable supply during all water conditions.

Policy PFS-2.3: *Water Supply and Infrastructure*. The Town shall ensure there is adequate water supply and infrastructure in place or that will be available prior to approving any new development.

Policy PFS-2.4: *Cost of New Infrastructure*. The Town shall require that costs of improvements to the water system that are necessary for new developments are financed by the property owner and/or developer, based on determination of nexus of impacts created.

Policy PFS-2.5: *Recycled Water*. The Town shall continue to support the beneficial reuse of recycled water and the joint use of facilities including reservoir, distribution mains, and pumping facilities for the use of recycled water when such joint use benefits the environment.

Policy PFS-2.6: *2020 Water Conservation Targets*. The Town shall achieve a 20 percent reduction in per-capita water use by 2020 consistent with the State's 20x20x20 Water Conservation Plan.

Policy PFS-2.7: *Water Conservation Enforcement*. The Town shall continue to enforce Town ordinances that prohibit excess water runoff and waste through applicable penalties and fees.

Policy PFS-2.8: *Conservation Efforts*. The Town shall continue to require the use of water-conserving plumbing fixtures, such as low-flow toilets and showerheads, and water-efficient dishwashers and washing machines in all new development.

Policy PFS-2.9: *Water Efficient Landscaping*. The Town shall require new development to incorporate and implement a whole systems approach to design, construction, installation and maintenance of the landscaping so as to result in water conserving, climate-appropriate landscapes, improved water quality and the minimization of natural resource inputs.

The 2040 General Plan is consistent with the recommendations of the 2015 UWMP to ensure timely provision of public facility and municipal utility improvements (Policy PFS-1.1). In addition, Policy PFS-1.5 (Sustainable Practices), would support conservation practices that reduce water use, and Policy PFS-1.7 (Priority Infrastructure), gives high priority to funding for the rehabilitation or replacement of critical infrastructure.

Policies PFS-2.1 (Water Master Plan) and PFS-2.2 (Urban Water Management Plan), would support the maintenance, implementation, and updating the Water Master Plan to ensure the reliability and efficiency of the Town's water distribution system and maintaining of the Urban Water Management Plan to adequately estimate projected water demands. Policy PFS-2.3 (Water Supply

and Infrastructure) and PFS-2.4 (Cost of New Infrastructure), would ensure adequate water supply and infrastructure is in place or will be available prior to approving new development and that those costs for new development are financed by the property owner and/or developer.

In addition, policies PFS-2.5 through PFS-2.9 would promote or require the efforts to conserve water use and support the reuse and recycling of water including reducing per-capita water use 20 percent by the year 2020, developing joint-use facilities for recycling water, and use of water-conserving plumbing fixtures and water efficient landscaping. With adherence to these 2040 General Plan policies, impacts would be less than significant.

Mitigation Measure

Because impacts are less than significant, no mitigation is necessary.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Exceed the wastewater treatment requirements of the applicable Regional Water Quality Control Board; 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, or; result in a determination that the wastewater treatment provider does not have adequate capacity to serve projected demand in addition to existing commitments.

IMPACT UTL-2 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD INCREASE DEMAND FOR WASTEWATER COLLECTION AND TREATMENT BUT GOALS AND POLICIES IN THE 2040 GENERAL PLAN WOULD ENSURE SUFFICIENT WASTEWATER TREATMENT CAPACITY. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Windsor wastewater treatment facility provides tertiary treatment and ultraviolet light disinfection and has an average dry-weather design capacity of 2.25 million gallons per day (mgd). The Windsor Water Reclamation Facility has an average dry-weather capacity of 1.9 mgd. The WWD disposes of approximately 350 million gallons through land discharge (irrigation of farm lands) and 300 million gallons through creek discharge, annually. The projected growth in the 2040 General Plan would require an appropriate increase in wastewater capacity to meet the demand from new development. The planned growth for the Town of Windsor is estimated at 156 dwelling units per year for a total of 3,910 new units by 2040 (see Table 3). The population increase would be 11,067 for a total population of 38,028 by 2040 (see Table 4). This equates to an annual growth rate of 1.37 percent and a 41 percent increase in population by 2040. An expansion of water reclamation facility capacities would need to be commensurate with this growth in order to mitigate the impacts from this increase. The SSMP includes Capacity Enhancement Measures that must identify the steps needed to establish a short- and long-term capital improvement plan (CIP) to address identified hydraulic deficiencies. The planned improvements would increase capacity by requiring specific design criteria, such as minimum size for relief sewers and a minimum diameter for new sewers. The policies in the 2040 General Plan, as described below, would address this need requiring commensurate increased wastewater capacity to meet the needs from new growth and funding of the new capacity by the new development.

Utilities and Service Systems Element Goals and Policies

Goal PFS-3: Wastewater and Water Reclamation System. Operate and maintain the Town's sanitary sewer system, wastewater treatment plant and reclamation facilities to provide adequate capacity for existing residents, businesses and future development.

Policy PFS-3.1: *Wastewater System Capacity*. The Town shall provide sufficient wastewater conveyance, storage, and pumping capacity for peak sewer flows and infiltration.

Policy PFS-3.2: *Wastewater Treatment Master Plan*. The Town shall maintain and implement the Master Plan for Wastewater Treatment, Storage, and Disposal to acknowledge the rate, amount, and location of development projected for Windsor.

Policy PFS-3.3: *Collection System Master Plan*. The Town shall maintain and implement a Master Plan for a sewer collection system network that provides for sanitary sewer flows, including inflow and infiltration, from existing residents, businesses and future development.

Policy PFS-3.4: *Wastewater Treatment Plant Capacity*. The Town shall continue to monitor wastewater treatment capacity to ensure compliance with the Town's NPDES waste discharge permit and to provide sufficient treatment capacity for new development.

Policy PFS-3.5: *Wastewater Treatment Standards*. The Town shall ensure that treated wastewater complies with the Town's NPDES waste discharge permit regarding reclamation, recycled water landscape irrigation and land application.

Policy PFS-3.6: *Wastewater Reclamation and Beneficial Reuse*. The Town shall continue to maximize the beneficial uses of treated wastewater to the extent practicable, in accordance with the standards and policies of the Regional Water Quality Control Board (RWQCB).

Policy PFS-3.7: *Trunk Sewer Plan*. The Town shall implement and update as necessary, the Trunk Sewer Plan for Wastewater Collection to reflect the rate, amount, and location of development projected for Windsor.

Policy PFS-3.8: *Sanitary Sewer Management Plan*. The Town shall maintain and implement a Sewer System Management Plan (SSMP), which will serve as a reference and guidelines for the Town's sanitary sewer system management practices for the purpose of reducing and preventing sanitary sewer overflows to Waters of the State.

Policy PFS-3.9: *Collection System Remedial Measures*. The Town shall implement the measures identified in the Settlement Agreement regarding the sanitary sewer system and flow equalization ponds.

Policy PFS-3.10: *Recycled Water Plan*. The Town shall maintain and implement a Recycled Water Plan to expand recycled water use as a potable offset, throughout the Windsor Water District including the east side of town; to provide for additional recycled water storage.

Policy PFS-3.11: *Cost of New Infrastructure*. The Town shall require that costs of improvements to the wastewater and water reclamation system that are necessary for new development are financed by the property owner or developer, based on determination of nexus of impact created.

The 2040 General Plan policies PFS-3.1 through 3.4 and PFS-3.7 through 3.9 would address the need for adequate capacity in the wastewater system, collection, treatment, and discharge, requiring the Town to provide sufficient capacity and to maintain and implement a "Master Plan for Wastewater

Treatment, Storage, and Disposal to acknowledge the rate, amount, and location of development projected for Windsor" and "maintain and implement a Master Plan for a sewer collection system network" (Policy PFS-3.2 and 3.3) along with a Trunk Sewer Plan (Policy PFS-3.7), Sanitary Sewer Management Plan (Policy PFS-3.8), and complying with the Settlement Agreement with River Watch in 2014 (Policy PFS-3.9). In addition, Policy PFS-3.5 (Wastewater Treatment Standards) would require the Town to comply with their NPDES discharge permit to address treated wastewater disposal. Towards reducing discharge, policies PFS-3.6 and 3.10 to maximize beneficial uses of treated wastewater and implement a Recycled Water Plan support such actions. Policy PFS 3.11 would address the cost coming from new development, requiring new development cover the costs for improvements to the wastewater and water reclamation system necessary from their development. With adherence to these 2040 General Plan policies, impacts would be less than significant.

Mitigation Measure

Because impacts are less than significant, no mitigation is necessary.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs or fail to comply with federal, state, and local statutes and regulations related to solid waste

IMPACT UTL-3 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD INCREASE DEMAND FOR SOLID WASTE SENT TO AREA LANDFILLS. HOWEVER, LANDFILLS SERVING THE TOWN OF WINDSOR HAVE ADEQUATE CAPACITY TO ACCEPT THE ADDITIONAL WASTE. FURTHER, THE 2040 GENERAL PLAN CONTAINS POLICIES TO INCREASE RECYCLING. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Republic Services of Sonoma County, Inc. operates a large central landfill, located outside of Petaluma as well as four smaller transfer stations, located in Annapolis, Guerneville, Healdsburg, and Sonoma. The Central Disposal Site total site area is 398.5 acres. The current remaining capacity of the Central Landfill is 9,076,760 cubic yards as of May 2012 (calrecycle.gov Central Disposal Site 49-AA-001, accessed 6/2017). The permitted daily tonnage for the landfill is 2,500 tons with an average daily tonnage received of 1,250 tons (50 percent of daily capacity). The permitted daily volume is 4,167 cubic yards with the average daily loading of 2,435 cubic yards (59 percent of daily capacity). Based on the annual tonnage from the Town of Windsor (10,575.71 tons per year, or approximately 29 tons per day), Windsor provides two percent of the daily volume sent to the Central Landfill, which is one percent of the daily permitted volume. The projected growth accommodated by the 2040 General Plan would increase solid waste generation in the Town but this increase would not have a significant impact on the capacity of the Central Disposal Site. The Town of Windsor's population is projected to increase by 41 percent or 11,067 residents by 2040 (Table 4 Projected Population). This increase would have a limited impact on the daily volume of solid waste Windsor would send to the Central Disposal Site. The daily volume provided by Windsor would increase to 2.8 percent of the current average daily load and 1.7 percent of the permitted daily volume based on a 41 percent increase in tonnage commensurate with the population increase. The policies in the 2040 General Plan would promote waste diversion and ensure sufficient landfill capacity is available to accommodate the estimated increase in solid waste generation.

Utilities and Service Systems Element Goals and Policies

Goal PFS-5: Solid Waste and Recycling Curtail excess waste entering local landfills through waste management and recycling.

Policy PFS-5.1: *Waste Management*. The Town shall continue to improve its solid waste management system through emphasis on waste prevention, reuse, recycling, composting, and disposal.

Policy PFS-5.2: *Waste Collection*. The Town shall continue to provide convenient and cost effective waste collection.

Policy PFS-5.3: *Reduce Municipal Solid Waste*. The Town shall reduce municipal solid waste generation by employing a wide range of innovative techniques, including electronic communications to reduce paper usage and buying products with less packaging or in bulk, where feasible.

Policy PFS-5.4: *Curbside Collection*. The Town shall encourage the community to participate in single family residential and multi-family residential annual curbside collection opportunities.

Policy PFS-5.5: *Hazardous Materials*. The Town shall eliminate hazardous waste from entering local landfills.

Policy PFS-5.6: *Recycling Collection*. The Town shall require all projects, except for single family residential, to provide sufficient and accessible space for the storage and collection of recyclable materials and organic waste separate from, and in addition to, space for refuse storage and collection.

Policy PFS-5.7: *Recycling Outreach*. The Town shall implement recycling and proper waste disposal outreach and education to residents, local schools, and businesses.

Policy PFS-5.8: *2020 Recycling Target*. The Town shall support efforts to recycle at least 75 percent of solid waste by 2020 (AB 341), and shall work with the Town's franchise waste hauler and regional waste authorities toward a goal of 90 percent waste reduction.

The *Public Facilities and Services* policies addressing solid waste would support the reduction of waste through prevention, reuse, recycling, and composting. Policy PFS-5.3 aims to reduce municipal solid waste generation. Other policies would require projects to provide space for recycling (PFS-5.6), recycling outreach (PFS-5.7), and supporting the goal set by AB 341 to recycle at least 75 percent of solid waste by 2020 and setting a Town goal of 90 percent waste reduction (PFS-5.8).

Although the projected increase in solid waste by the Town of Windsor would not significantly impact the total capacity of the Central Land Fill, a 2014 study by Sonoma County approximates that 66 percent of the 262,500 tons of garbage disposed in Sonoma County annually can be classified as divertible, potentially divertible, or compostable, with the most prevalent waste from both residential and commercial sources is organics (Sonoma County Waste Management Agency 2017). This information demonstrates an opportunity for increased recycling efforts to reduce solid waste going to the Central Landfill by up to two-thirds (66 percent). Therefore, adherence to the policies to recycle at least 75 percent of solid waste by 2020 and 90 percent by 2040 have the potential to offset the additional waste generated by the Town of Windsor conservatively assuming only the projected 66 percent of current waste being recyclable (66 percent diversion offsetting a 41 percent

increase). With adherence to proposed 2040 General Plan policies, impacts would be less than significant.

Mitigation Measure

Because impacts are less than significant, no mitigation is necessary.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold:	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects

IMPACT UTL-4 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD INCREASE DEMAND FOR STORM WATER CONVEYANCE, BUT POLICIES TO ENCOURAGE LOW IMPACT DEVELOPMENT AND OTHER POLICIES WILL LIMIT ANY IMPACT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Town of Windsor does not operate a separate drainage system that treats storm water. Runoff from impervious surfaces is channeled directly into local waterways. Development facilitated by the 2040 General Plan may increase the amount of impervious surfaces in the Town thus increasing storm water runoff and the need for storm water conveyance facilities. However, the policies in the 2040 General Plan would address potential increases in storm water runoff.

Utilities and Service Systems Element Goals and Policies

Goal PFS-4: Storm Water Drainage. Improve the Town's storm water drainage system to reduce excess runoff, reduce impacts to water quality, and protect environmentally sensitive areas.

Policy PFS-4.1: *Storm Water Management Plan*. The Town shall maintain and implement a Storm water Management Plan, which is designed to protect water quality through implementation of best management practices for storm water runoff from development.

Policy PFS-4.2: *Flood Control*. The Town shall develop and implement a Storm Drainage Master Plan for the storm drainage system network that provides for sufficient capacity for storm water runoff from existing and future development and addresses flooding in low-lying areas.

Policy PFS-4.3: *Low Impact Development*. The Town shall provide requirements for Low Impact Development (LID) techniques for reducing pollutants in storm water from new development and reconstruction projects and implement LID in conjunction with the policies specified by the State Water Resources Control Board (SWRCB) and National Pollutant Discharge Elimination System (NPDES) Permit regarding storm water runoff, treatment and collection.

Policy PFS-4.4: *Education on Storm Water Runoff Effects*. The Town shall encourage educational opportunities for citizens regarding storm water runoff, its impacts to water quality, and strategies to mitigate impacts.

In an effort to reduce runoff and water quality impacts to the waterways, the Town, through their General Plan, encourages Low Impact Development (LID) and Best Management Practices (BMPs) as mitigation to limit excess water runoff and discharge into waterways. Storm water policies in the 2040 General Plan would promote the mitigation of storm water runoff through collection,

drainage, and sustainable practices. The policies include maintaining and implementing a Storm water Management Plan (PFS-4.1) and Storm Drainage Master Plan (PFS-4.2). These plans set out specific goals, programs, and regulations for the management and conveyance of storm water to reduce excess run-off and potential pollution of environmentally sensitive areas, along with compliance to all applicable regulations controlling storm water drainage and discharge. The additional policy requirements for LID techniques for reducing pollutants in storm water from new development and reconstruction projects (PFS-4.3) and encouraging the education of citizens regarding water quality impacts from storm water runoff (PFS-4.4) provide an added level of protection by educating residents on their responsibilities for not discharging pollutants and implementing LID techniques, not only on new construction, but for reconstruction or updating existing properties. With adherence to 2040 General Plan policies, impacts would be less than significant.

Mitigation Measure

Because impacts are less than significant, no mitigation is necessary.

Significance After Mitigation

Impacts would be less than significant without mitigation.

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4.16 Tribal Cultural Resources

This section evaluates potential effects on tribal cultural resources related to implementation of the proposed General Plan.

4.16.1 Setting

Project lies within an area traditionally occupied by the Pomo. A full discussion of the prehistoric and ethnographic setting of the region is presented in Section 4.5, *Cultural Resources*.

Regulatory Setting

State

Assembly Bill 52

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." Assembly Bill 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and meets either of the following criteria:

a) 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

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of 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.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Senate Bill 18

California Government Code §65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and

Research's Tribal Consultation Guidelines (2005), "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

Existing Conditions

As part of the process of identifying tribal cultural resources issues within or near the project site, the Native American Heritage Commission (NAHC) conducted a search of the Sacred Lands File (SLF). The SLF search stated that the SLF search was completed with negative results.

AB 52 and SB 18 Consultation

In accordance with AB 52 and SB 18, the Town of Windsor notified California Native American tribes listed in Table 42 of the proposed General Plan and invited them to participate in consultation. The NOP for the proposed General Plan EIR was sent to tribes on November 30, 2016 and AB 52 letters were sent to each tribe on January 18, 2017. The results of the NAHC requests, draft letters, guidance, and tables are provided in Appendix E.

Table 42 Native American Tribes Requesting Consultation

Tribal Contact	AB 52	SB 18	Responded?
Federated Indians of Graton Rancheria	X	X	Yes
Cloverdale Rancheria of Pomo Indians of California		X	No
Dry Creek Rancheria Band of Pomo Indians		X	No
Kashia Band of Pomo Indians of Stewarts Point		X	No
Lytton Rancheria of California	X	X	Yes
Middletown Rancheria		X	Yes
Mishewal-Wappo Tribe of Alexander Valley		X	No

The Federated Indians of Graton Rancheria responded to the projects NOP on December 2, 2016 and stated that the Tribe would review the project and provide a response at a later date. The Tribe responded on February 17, 2017, after the AB 52 notification letter had been sent, requesting consultation. The Town responded on February 23, 2017 and on April 26, 2017 to request potential dates and times for a meeting. No communication from the Graton Rancheria has been received by the Town since February 17, 2017.

The Lytton Rancheria of California responded on December 2, 2016 and stated that they will be participating and consulting regarding the treatment of cultural resources for Town of Windsor projects. The Lytton Rancheria provided comments and suggested edits on the Environmental Resources Element of the General Plan. The Town made the suggested edits and consultation concluded.

The Middletown Rancheria responded on January 20, 2017 stating that they had no specific comment but that they looked forward to continuing to be part of the process.

4.16.2 Impact Analysis

Methodology and Thresholds of Significance

According to Appendix G of the *State CEQA Guidelines*, an impact to Tribal Cultural Resources from the proposed General Plan would be significant if the project would:

1) 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:

    a) 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

    b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of 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.

Project Impacts and Mitigation Measures

Threshold:	Cause a substantial adverse change in the significance of a tribal cultural resource.

IMPACT TCR-1 DEVELOPMENT FACILITATED BY THE PROPOSED GENERAL PLAN MAY INVOLVE SURFACE EXCAVATION, WHICH HAS THE POTENTIAL TO IMPACT PREVIOUSLY UNIDENTIFIED TRIBAL CULTURAL RESOURCES. HOWEVER, WITH ADHERENCE TO POLICIES CONTAINED IN THE 2040 GENERAL PLAN UPDATE, IMPACTS TO TRIBAL CULTURAL RESOURCES WOULD BE LESS THAN SIGNIFICANT.

Effects on tribal cultural resources are only knowable once a specific project has been proposed because the effects are highly dependent on both the individual project site conditions and the characteristics of the proposed activity. Although the current AB 52 for this document failed to identify any TCRs, new TCRs may be identified or established over the course of the phased implementation of this General Plan which is expected to occur over the course of several years. Therefore, as specific projects are proposed, consultation with tribes under AB 52 should occur to determine if any TCRs may be impacted by project specific elements. If TCRs are identified during future AB 52 consultation efforts, impacts to any such TCRs would be potentially significant unless mitigation is incorporated. The General Plan contains a policy requiring compliance with SB 18 and AB 52 (ER-7.6), as well as a policy requiring the protection of tribal cultural resources (ER-7.3) and compliance with regulations related to the treatment of human remains of Native American origin (ER-7.4).The policies relating to tribal cultural resources in the General Plan will ensure that impacts will be less than significant. The following are the General Plan goals and policies that relate to tribal cultural resources:

Environmental Resources Element Goals and Policies

Goal ER-7: Cultural Resources. Identify and preserve significant cultural or historical sites or structures by promoting public awareness of and support for historic preservation.

Policy ER-7.3: ***Protection of Native American Cultural Resources*****.** The Town shall encourage the identification, preservation, and protection of Tribal Cultural Resources, traditional cultural landscapes, sacred sites, places, features, and objects, including historic or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites in consultation or coordination with the appropriate Native America tribe(s), and shall ensure appropriate treatment of Native American and other human remains discovered during a project.

Policy ER-7.4: ***Treatment of Remains*****.** ~~Consistent with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98, if human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. The remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains.~~ If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be list in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines that remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

Policy ER-7.6: ***Compliance with SB18 and AB52*****.** The Town shall continue to comply with SB18 and AB52 by consulting with local Native American tribes on potential disturbance, recovery and preservation of tribal cultural resources, including development of strong consultation protocols with appropriate Native American tribe(s).

With implementation of these goals and policies, potential impacts associated with future development under the General Plan would be less than significant.

Mitigation Measures

No mitigation measures are required because implementation of Policies ER-7.3, ER-7.4, and ER-7.6 from the 2040 General Plan would reduce impacts to a less than significant level by requiring protection of Native American Cultural Resources, proper treatment of Native American human remains, and compliance with state regulations. However the following mitigation measures from Section 4.5, Cultural Resources, are recommended to further reduce impacts to tribal cultural resources.

CR-1 Cultural Resources Study Implementation Program

The following Implementation Program shall be added to the 2040 General Plan:

If the preliminary reconnaissance required under Policy ER-7.10 suggests that significant historic resources, cultural resources, or tribal cultural resources may exist or for any other project

requiring discretionary approval where there will be substantial ground disturbance by the project, the applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in archaeology and/or an architectural historian meeting the SOI PQS standards in architectural history to complete a Phase 1 cultural resources inventory of the project site (NPS 1983). A Phase 1 cultural resources inventory should include a pedestrian survey of the project site and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC). The technical report documenting the Phase 1 cultural resources inventory shall include recommendations to avoid or reduce impacts to cultural resources.

CR-2 Tribal Cultural Resource Consultation

Mitigation Measure CR-1 shall apply to all discretionary projects. Where potential tribal cultural resources are encountered or revealed through the Phase 1 Survey, the Town will consult with applicable tribe(s) to determine appropriate measures for addressing the resources.

CR-4 Human Remains

If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be list in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines that remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

Significance After Mitigation

Impacts to tribal cultural resources would be *less than significant with* adherence to goals and policies contained in the General Plan Update. However, cultural resources mitigation measures from Section 4.5, *Cultural Resources*, are recommended to further reduce impacts.

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4.17 Effects Found Not to be Significant

4.17.1 Agricultural Resources

Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Lands under Williamson Act contracts preserve large portions of areas in agricultural production/open space in exchange for reduced property tax assessments. As shown in Figure 6, there are no Williamson Act contract lands located in the Plan Area. Therefore, the proposed project would have no impact on Williamson Act contract lands.

Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)); or result in the loss of forest land or conversion of forest land to non-forest use?

Throughout the General Plan Area, along hillsides, roadways and open pastures, large majestic oak trees are the community's most distinctive vegetation feature. However, there are no areas in the Plan Area that meet the definition of a forestry resource, as defined by California Public Resources Code Section 12220(g). Therefore, there would be no impacts to timberland or loss of forest land.

4.17.2 Mineral Resources

Would the project result in a loss of availability of a known mineral resource that would be of value to the region and residents of the state?

Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No significant mineral resource deposits are identified within the General Plan area (Town of Windsor 2015a). No impacts to mineral resources would occur.

4.17.3 Parks and Recreation

Would the project result in substantial adverse physical impacts associated with the need for or provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other objectives for parks?

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?

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?

The residents of Windsor have access to three regional parks totaling 1,356 acres owned and operated by Sonoma County (Foothill Regional, Riverfront Regional, and Shiloh Ranch), five community parks and 14 neighborhood parks totaling 110 acres (Town of Windsor 2015a). The General Plan park standard is five acres of parkland per 1,000-population. The full buildout of the

proposed 2040 General Plan could accommodate an estimated 11,067 new residents and 3,910 new dwelling units. Therefore, implementation of the 2040 General Plan may increase the demand for parks and recreation such that new or physically altered facilities are needed. However, in accordance with 2040 General Plan policy PFS-9.12, Parks Dedication, all new development is required to dedicate land and/or contribute in-lieu fees to meet the park requirements for all new residential subdivisions in Windsor. The required adherence to this policy provides additional park and recreational space for new development, thereby not adding or accelerating substantial physical deterioration of existing parks or recreational facilities. In addition, in June 2017 the Town Council adopted the Parks and Recreation Master Plan which "identifies a planning blueprint to improve, protect, and expand the Town's network for parks, facilities and recreational services for the future, including sustainable goals for appropriate maintenance and funding for existing and future development." The Master plan works to ensure that adequate parks, facilities, and recreation programs meet the needs of the Town's future residents, employees, and visitors. The Initial Study- Mitigated Negative Declaration for the Parks and Recreation Master Plan found that all environmental impacts associated with new park development under the Master Plan would be less than significant or significant but mitigable. The 2040 General Plan does not include any specific projects to construct new recreational facilities and no such impacts related to construction of new recreational facilities would occur.

5 Other CEQA Required Sections

This section discusses other issues for which CEQA requires analysis in addition to the specific issue areas discussed in Section 4, *Environmental Impact Analysis*. These additional issues include the project's potential to induce growth and create significant and irreversible impacts on the environment.

5.1 Growth Inducing Effects

CEQA Guidelines Section 15126.2(d) requires that EIRs discuss the potential for projects to induce population or economic growth, either directly or indirectly. CEQA also requires a discussion of ways in which a project may remove obstacles to growth.

5.1.1 Population and Employment Growth

As described in detail in Section 4.12, *Population and Housing,* full buildout of the proposed 2040 General Plan could accommodate an estimated 11,067 new residents and 3,910 new dwelling units in the Town. With the estimated growth under the General Plan, the Town of Windsor would have a 2040 population of 38,028 and 13,544 dwelling units. This would exceed ABAG growth projections and the anticipated growth rate of 26 percent to 33 percent projected in the SCTA Comprehensive Transportation Plan. However, the maximum buildout estimate under the proposed 2040 General Plan assumes that all remaining properties within the Town's Urban Growth Boundary would be newly developed or redeveloped by 2040. This is an unlikely scenario due to the requirements and process necessary to carry out development.

Additionally, development in the Town facilitated by the 2040 General Plan would be required to be in compliance with the Town's Growth Control Ordinance. The purpose of the ordinance is "to accommodate growth anticipated under the General Plan, and to manage new development so that it occurs concurrently with necessary public services, facilities, and infrastructure." The ordinance considers the status and capacity of infrastructure, the fiscal conditions of the Town, the status of housing production, recommended development incentives, and entitled units in establishing the number of annual growth control allocations for the Town. Therefore, development would be limited to the growth control allocations provided under the Growth Control Ordinance.

As discussed in Section 4.12, *Population and Housing*, numerous goals and policies of Land Use and Community Design Element of the 2040 General Plan are aimed at reducing the impacts associated with population and housing unit growth in the Town by supporting the Town's Growth Control Ordinance. This would also limit potential growth in the Town's resident population.

Finally, it is the specific purpose of the project to guide growth and development in the Town such that infill development would be prioritized and a more defined community edge would be established. Therefore, by its nature, the proposed project is intended to reduce the potential for uncontrolled growth and associated environmental impacts. For the reasons discussed above, implementation of the project would not lead to such impacts.

5.1.2 Removal of Obstacles to Growth

Concurrent with the 2040 General Plan Update, the Town of Windsor is proposing that the Urban Growth Boundary be renewed for 22 years to coincide with the horizon year of the General Plan Update. The Town is also proposing that the UGB be expanded to include an additional 22.5 acres of land, representing less than one-half of one percent of the total land area within the current UGB. Renewal and expansion of the UGB will require approval of a ballot measure by voters. A separate CEQA document analyzing potentially significant environmental impacts associated with inclusion of the expansion properties in the UGB and their future development with light industrial and public uses has been prepared independently from this EIR.

The 2040 General Plan encourages development within the General Plan Area, while supporting land uses that are rural and agricultural beyond the General Plan Area. New development would occur primarily where existing roads, water, and sewer are in place and in a manner that minimizes the impact of development on existing infrastructure and services. Development of vacant lands would require new connections. However, major infrastructure extensions generally are not envisioned and improvements would be primarily limited to replacement/upgrade of aging facilities and enhancement of existing infrastructure in key locations. Development in the General Plan Area is limited to the UGB, except for development authorized by the Open Space, Parks, and Public/Quasi-Public/Institutional land use designations, per Policy LU-7.1. Policy LU-7.12 of the 2040 General Plan prohibits sewer, water, and other town service extensions beyond the Urban Growth Boundary. In addition, Goal LU-8: Growth Control Ordinance and the supporting policies in the 2040 General Plan would allow Windsor to grow at a reasonable pace and achieve greenhouse gas emission reduction goals. Therefore, the 2040 General Plan would limit development in Windsor, thereby, controlling rather than removing obstacles to growth.

5.2 Irreversible Environmental Effects

The *State CEQA Guidelines* require that EIRs evaluating projects involving amendments to public plans, ordinances, or policies contain a discussion of significant irreversible environmental changes. CEQA also requires decision-makers to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve a project. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the development that would be facilitated by implementation of the 2040 General Plan.

Construction activity associated with planned development that would be accommodated under the 2040 General Plan would involve the use of building materials and energy, some of which are non-renewable resources. Consumption of these resources would occur with any development in the region and are not unique to Windsor or the proposed 2040 General Plan. The addition of new residential and non-residential development in the Town through 2040 would irreversibly increase local demand for non-renewable energy resources such as petroleum and natural gas. Increasingly efficient building fixtures and automobile engines, as well as implementation of policies included in the 2040 General Plan, are expected to offset the demand to some degree. It is not anticipated that growth accommodated under the General Plan would significantly affect local or regional energy supplies.

Growth facilitated by the General Plan would require an irreversible commitment of law enforcement, fire protection, water supply, and wastewater treatment. As discussed in Sections

4.13 and 4.15, impacts to public services and utilities would be reduced to a less than significant level with implementation of policies included in the 2040 General Plan.

The additional vehicle trips associated with growth through 2040 would incrementally increase local traffic, noise levels, and regional air pollutant emissions. As discussed in Section 4.3, *Air Quality*, implementation of 2040 General Plan policies and regional air pollution programs could reduce the air pollutant emissions associated with individual future development projects to below significance thresholds. As discussed in Section 4.11, *Noise*, implementation of proposed policies and mitigation measures could reduce the noise impacts associated with future growth to a less than significant level. As discussed in Section 4.14, *Transportation/Traffic*, 2040 General Plan policies and mitigation measures would reduce traffic intersection impacts to a less than significant level. However, traffic queuing impacts on roadways within the Town would remain significant and unavoidable.

5.3 Energy Effects

Public Resources Code Section 21100(b)(2) and Appendix F of the *State CEQA Guidelines* require that EIRs include a discussion of the potential energy consumption and/or conservation impacts of proposed projects when relevant, with particular emphasis on avoiding or reducing inefficient, wasteful, or unnecessary consumption of energy.

California is one of the lowest per capita energy users in the United States, ranked 49th in the nation, due to its energy efficiency programs and mild climate (U.S. Energy Information Administration [EIA] 2014). California used 295,405 gigawatt-hours (GWh) of electricity in 2015 and 2,309,759 million cubic feet of natural gas in 2014 of which 401,172 million cubic feet were consumed by residential users (EIA 2015). In addition, Californians presently consume nearly 18 billion gallons of motor vehicle fuels per year (California Energy Commission [CEC] 2014). The single largest end-use sector for energy consumption in California is transportation (38.7 percent), followed by industry (24.4 percent), commercial (18.6 percent), and residential (18.3 percent) (EIA 2014).

Electricity and natural gas service in the Town of Windsor is provided by Pacific Gas & Electric (PG&E). PG&E provides natural gas and electric service to approximately 16 million people throughout a 70,000-square mile service area in northern and central California (PG&E 2017). In 2015, PG&E provided 29,796 million GWh of electricity to its residential users and 56,193 GWh of electricity to all other user types (CEC 2016a). In 2015, PG&E provided 1,690 million therms of natural gas to its residential users and 2,718 million therms of natural gas to all other user types (CEC 2016b).

Development facilitated by the 2040 General Plan would involve the use of energy during construction and operation. Energy use during construction would be primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators for lighting. Temporary grid power may also be provided to construction trailers or electric construction equipment. Long-term operation of development projects would require permanent grid connections for electricity and natural gas service to power internal and exterior building lighting, and heating and cooling systems. In addition, the increase in vehicle trips associated with potential development would increase fuel consumption.

Table 43 shows the estimated electricity and natural gas demand compared to statewide demand for buildout under the 2040 General Plan. Electricity and natural gas consumption were estimated using CalEEMod, as described in Section 4.3, *Air Quality* and Section 4.7, *Greenhouse Gas Emissions*

(refer to Tables 5.2 and 5.3 included in Appendix B). Based on the modeling assumptions described in Section 4.3, *Air Quality* and Section 4.7, *Greenhouse Gas Emissions*, development facilitated by the 2040 General Plan would utilize approximately 39,676 megawatt hours (MWh) of electricity and approximately 150 million cubic feet of natural gas per year during operation. As shown in Table 43, electricity consumption for buildout under the 2040 General Plan would represent approximately 0.0001 percent of statewide annual demand, and natural gas consumption for buildout under the 2040 General Plan would represent approximately 0.00006 percent of statewide annual demand.

Table 43 Project Energy Use Relative to Statewide Energy Use

Form of Energy	Units	Annual General Plan-Related Energy Use	Annual Statewide Energy Use	Project Percent of Statewide Energy Use
Electricity	Megawatt hours	39,6761	295,405,0002	0.0001%
Natural Gas	Billions of cubic feet	0.151	2,3133	0.00006%

[1] CalEEMod output (provided in Appendix B)

[2] California Energy Commission 2017a

[3] California Energy Commission 2017b

A large portion of the energy use associated with development facilitated by the 2040 General Plan would result from fuel consumption from new vehicle trips. As shown in Table 44, implementation of the General Plan would generate a net increase of approximately 148,314 daily vehicle miles traveled (VMT) or approximately 54,134,610 annual VMT. Table 44 shows the estimated annual operational fuel consumption due to vehicle travel from 2040 General Plan buildout. Fuel consumption was estimated using the total daily VMT provided from SCTA (SCTA 2017), and average fuel efficiencies for each vehicle category (refer to Table 4.2 included in Appendix B, which shows the default fleet vehicle mix used by CalEEMod). Based on these assumptions, the project would result in the consumption of approximately 2,993,760 gallons of vehicle fuel per year during operation, which represents approximately 0.012 percent of annual statewide fuel consumption.

Table 44 Project Operational Vehicle Fuel Consumption

Vehicle Type	Percent of Vehicle Trips[1]	Annual Vehicle Miles Traveled[2]	Average Fuel Efficiency (miles/gallon)[3]	Total Annual Fuel Consumption (gallons)
Passenger Cars	63.4%	34,321,343	23.3	1,473,019
Light/Medium Trucks	27.5%	14,887,018	17.1	870,586
Heavy Trucks/Other	8.7%	4,709,711	7.3	645,166
Motorcycles	0.4%	216,538	43.4	4,989
Total	100.0%	54,134,610	–	2,993,760
State Motor Vehicle Fuels				18,019,000,000[4]
Project Percent of Statewide Energy Use				0.012%

[1] Percent of vehicle trips found in Table 4.3 "Trip Type Information" in CalEEMod outputs (see Appendix B)

[2] Total daily VMT provided by SCTA, 2017. Annual VMT per vehicle type = Daily VMT *365 days per year * Percent of vehicle trips per vehicle type.

[3] Source: US DOT, Bureau of Transportation Statistics. 2013. National Transportation Statistics 2013, Tables 4-12 and 4-13. Washington DC. Vehicle classes provided in CalEEMod do not correspond exactly to vehicle classes in USDOT fuel consumption data, except for motorcycles. Therefore, it was assumed that passenger cars correspond to the light-duty, short-base vehicle class, light/medium trucks correspond to the light-duty long-base vehicle class, and heavy trucks/ other correspond to the single unit, 2-axle 6-tire or more class.

[4] California Energy Commission 2015 Integrated Energy Policy Report

Note: Total may not add up due to rounding.

In addition, construction activities would also result in short-term fuel consumption from worker trips, operation of diesel-powered equipment, and hauling trips.

Appendix F Requirements and Energy Conservation Standards

Appendix F of the *State CEQA Guidelines* requires inclusion in an EIR of relevant information that addresses "potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy"(Public Resources Code Section 21100[b][3]). Although the *State CEQA Guidelines* do not include formal thresholds for evaluating the significance of potential energy-related impacts, the following discussion addresses direct energy impacts of the project as framed in Appendix F of the *State CEQA Guidelines* by evaluating whether the project would result in the wasteful or inefficient consumption of energy or the potential need for new energy-related infrastructure, the construction or operation of which would have significant impacts.

> Would the project result in the wasteful and inefficient use of non-renewable resources during construction and operation of the project?

Long-term operation of development projects facilitated by the 2040 General Plan would result in the annual consumption of approximately 39,676 megawatt hours of electricity, 0.15 million cubic feet of natural gas, and 2,993,760 gallons of vehicle fuel each year. Increasingly efficient building fixtures and automobile engines, as well as implementation of policies included in the 2040 General Plan, are expected to offset the energy demand facilitated by General Plan buildout to some degree.

The development facilitated by the 2040 General Plan would be subject to energy conservation requirements in the California Energy Code (Title 24, Part 6, of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (CALGreen) (Title 24, Part 11 of the California Code of Regulations). Adherence to Title 24 requirements would ensure that 2040 General Plan buildout would not result in wasteful and inefficient use of non-renewable resources due to building operation.

The following policies included in the 2040 General Plan would reduce future energy use in the Town of Windsor:

Environmental Resources Element Policies

Policy ER-5.4: *Encourage Development Patterns that Reduce Greenhouse Gas Emissions*. The Town shall strive to reduce [GHG] emissions by encouraging compact, mixed-use, pedestrian/bicycle friendly, transit-oriented development that reduces vehicle miles traveled (VMT); promoting energy efficient building enhancements, construction practices, design, and site planning; improving the job-to-housing ratio; and other methods of reducing greenhouse gas emissions while maintaining a balance of housing types.

Policy ER-5.8: *Energy Conservation and Efficiency Programs*. The Town shall promote energy conservation/energy efficiency improvement programs for residential and commercial properties such as those offered by Sonoma County Energy Independence Program (SCEIP) and Property Assessed Clean Energy (PACE), that reduce energy demand which contribute to background levels of regional air emissions and GHG emissions.

Policy ER-5.9: *Energy Conservation through Land Use*. The Town shall promote the creation of a land use pattern that reduces operational energy requirements, especially for transportation purposes, by:

a. Avoiding land use configurations and siting decisions that result in single-purpose automobile trips, and instead encouraging patterns that result in multi-purpose trips.

b. Promoting land use patterns that may be easily served by local transit and linked with regional transit.

c. Promoting land use patterns that provide employment opportunities for Windsor residents.

Policy ER-5.10: *Energy Performance Standards*. The Town shall require new construction to meet targeted energy performance standards to advance Town greenhouse gas reduction and other sustainability goals and policies identified in the General Plan and the 2020 Regional Climate Action Plan. The Town will allow new development to select from a range of options to achieve a minimum energy performance standard, including but not limited to:

- Solar easements to guarantee access to increased renewable energy generation
- Installation of EV charging stations in homes and in commercial development to increase the ability for the public to use zero-emission vehicles
- Passive heating and cooling building design
- Solar roof and carport panels
- Cool roofs

- Smart appliances
- Wind generation
- Installation of energy efficient appliances and fixtures
- Other emerging technologies as they become available

The Town shall work with affordable housing developers to assist in meeting the energy performance standards.

Policy ER-5.11: *Zero Net Energy Goals*. The Town shall strive to implement the State goal of zero net energy (ZNE) in all new residential construction by 2020 and ZNE in all new commercial construction by 2030.

Policy ER-5.12: *Retrofitting Existing Buildings*. The Town shall actively encourage the retrofitting of existing buildings throughout Windsor in order to align those buildings more closely with the Town's energy performance standards.

Policy ER-5.13: *Update Energy Policies and Programs*. The town shall regularly update and strengthen Town energy-related policies and programs for new and existing construction to reflect advances in technologies and practices.

Policy ER-5.14: *Compliance with Energy Regulations*. The Town shall continue to enforce State energy regulations governing energy consumption and use of solar and other renewable energy resources in existing and new development.

Policy ER-5.15: *Title 24 Application*. The Town shall require energy conservation standards for new residential construction, commercial construction, and within Town facilities, as contained in Title 24 of the California Code of Regulations, to be periodically reviewed to identify opportunities for adopting standards that more closely respond to local conditions, especially in the area of passive design, to reduce cooling loads.

Policy ER-5.19: *Energy Conservation Measures and Education*. The Town shall encourage energy conservation measures, such as insulation and weather-stripping, in existing structures through public education and financial assistance to low-and moderate-income families.

Policy ER-5.20: *Windsor Serving as the Energy Conservation Model*. The Town government shall be in the forefront of energy conservation efforts locally and regionally by undertaking and publicizing energy efficiency and renewable energy resource programs such as Sonoma County Energy Independence Program (SCEIP) and Property Assessed Clean Energy (PACE) and requiring all new Town buildings to be demonstration buildings and models of emerging energy and water technologies.

The development facilitated by the 2040 General Plan would be required to comply with applicable Title 24 building standards and numerous policies that would reduce construction and operational energy use by decreasing vehicle trips, increasing fuel efficiency, increasing building energy efficiency, and facilitating use of renewable energy. Therefore, the 2040 General Plan would not result in wasteful and inefficient use of non-renewable resources during construction and operation.

Would the project result in the need for new systems or substantial alterations to electrical, natural gas, or communication systems infrastructure, the construction or operation of which would have significant impacts?

New construction, or substantial alteration of existing, energy infrastructure to expand capacity could result in potentially significant environmental impacts. To determine whether 2040 General Plan buildout would require substantial alteration or new infrastructure, operational energy demands were estimated and compared to Statewide demand.

Based on the comparisons of 2040 General Plan buildout electricity, natural gas, and fuel demand to statewide demand for these resources shown in Table 43 and Table 44, energy demand associated with 2040 General Plan buildout would result in a nominal increase in statewide energy demand. Furthermore, California's use of non-renewable electricity and natural gas are expected to continue to decline as a proportion of overall energy demand due to stringent energy efficiency measures and a growing acceptance of solar power by residential and commercial customers. A mandated increase in renewable energy use would also serve to offset any increase in non-renewable energy use resulting from the General Plan buildout. Therefore, the 2040 General Plan would not be expected to result in the need for construction of new major facilities or substantial alteration of existing facilities to meet projected energy demands.

6 Project Alternatives

As required by Section 15126(d) of the State CEQA Guidelines, this EIR examines a range of reasonable alternatives to the proposed 2040 General Plan that could feasibly achieve similar objectives. The 2040 General Plan vision and thus the objectives for the future is as follows:

> Windsor is a family-oriented small town in the heart of Sonoma county wine country and near the Russian River recreation area that:
>
> - Provides a safe and walkable environment for residents and visitors;
> - Fosters diversity, collaboration, and civic engagement;
> - Promotes healthy and active lifestyles for all ages;
> - Demonstrates leadership and innovation in sustainable practices, development, and public infrastructure;
> - Supports a vibrant local and regional economy;
> - Values mobility and accessibility via walking, biking, and high quality public transit.

The 2040 General Plan sets the guiding principles for the Town. The guiding principles are contained on pages five through eight of the 2040 General Plan Introduction and abbreviated below:

- Town Identity: family-oriented small town with excellent resources
- Town Green and Downtown: a focal point for the community, public gathering space, and center of the Town
- Economic Vitality and Balance**:** destination for visitors and tourists and a mix of land uses to support a variety of development
- Community and Neighborhood Design: “Smart Growth Development,” visual interest, multiple options for mobility, and attractive open space
- Natural Resources and Agriculture: surrounding agricultural land defines the rural character, trails and parks, and agricultural farming in harmony with urban uses
- Sustainability and Resilience: stewardship of natural resources, energy efficiency, and sufficient resources

The analysis of alternatives focuses on the various land use scenarios that incorporate different assumptions regarding the combinations of future land uses and associated infrastructure improvements. Alternatives provided are intended to reduce or avoid significant and unavoidable impacts. As discussed in Section 4.0, *Environmental Impact Analysis*, the 2040 General Plan would have significant and unavoidable impacts related to agriculture (Impact AG-1) and traffic (Impact T-3). An alternative location for the project as a whole is not possible. However, within Windsor, the alternatives below consider different patterns of land use and infrastructure to accommodate forecasted future growth and regional housing needs.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project (2015 General Plan)
- Alternative 2: Proposed 2040 General Plan Without UGB Renewal and Expansion
- Alternative 3: New Agricultural Designation, No Mixed-Use Outside of Downtown, Less Overall Growth in Town

6.1 Alternative 1: No Project

6.1.1 Description

The No Project Alternative involves continued implementation of the 2015 General Plan. This alternative is comprised of a land use pattern that reflects the land use identified in the existing Windsor General Plan. Under this alternative, the proposed 2040 General Plan would not be adopted and the existing General Plan, including the land use map and all of the General Plan goals and policies, would remain in place through the horizon year of 2040. Thus, any new development in Windsor would occur consistent with the existing land use designations and the allowed uses within each designation. Similarly, any new infrastructure would occur as envisioned in the 2015 General Plan. Development under this alternative is anticipated to be more intensive at the edges of the General Plan Area resulting in more residential type development outside the Town Green and Downtown areas than under the 2040 General Plan. However, because this alternative would not include the higher density and higher Floor Area Ratios (FAR) within the Downtown areas, especially along the Old Redwood Highway corridor, overall development and anticipated growth would be reduced compared to the 2040 General Plan. Overall growth would be similar to that anticipated under the 2015 General Plan with approximately 13,011 dwelling units and a population of approximately 35,785 in the year 2040 (Town of Windsor, General Plan EIR 1995). This would be a reduction in overall development and growth compared to the 2040 General Plan which anticipates approximately 13,544 dwelling units and a population of approximately 38,028. Please note that under this alternative, it is assumed that the UGB would be renewed and expanded to include properties in the southwest of the Town to be designated for light industrial and public uses (similar to the assumption for the proposed 2040 General Plan). Therefore the General Plan Area for this alternative encompasses the expanded UGB, similar to the proposed 2040 General Plan.

6.1.2 Impact Analysis

Aesthetics

Development under the Town's 2015 General Plan would continue the currently planned land use pattern in the Town focused on revitalizing the Old Town, instead of the Town Green and Downtown. Implementation of Alternative 1 would involve less overall development and growth than would occur under the 2040 General Plan. The 2040 General Plan focuses on infill development and higher density development, such as mixed-use development, within the General Plan Area which would result in more growth (in the number households and population) as compared to the 2015 General Plan. Alternative 1, on the other hand, would continue the currently planned development pattern throughout the Town with more urban development at the edges of the General Plan Area compared to the 2040 General Plan. Thus under Alternative 1, the visual character would not be changed to the extent anticipated under the proposed 2040 General Plan. In addition, development under Alternative 1 would not be as dense as the 2040 General Plan thus impacting fewer aesthetic resources, such as the potential change in visual character or blocking

scenic views. Aesthetic impacts may still require mitigation for light and glare impacts, but overall less development and growth would result in fewer aesthetic impacts compared to the 2040 General Plan. Nevertheless, impacts for Alternative 1 would remain significant but mitigable, similar to the 2040 General Plan.

Agriculture

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town such as along the Old Redwood Highway corridor. As described above, this is because the 2040 General Plan focuses on infill development and higher density development, such as mixed-use development, within the General Plan Area which would result in more growth (in number households and population) as compared to the 2015 General Plan. However, the 2040 General Plan would downzone a large portion of land along the eastern boundary of the General Plan Area to rural residential that would create the opportunity for small farming, which would not be available under Alternative 1. In addition, neither the 2015 General Plan nor the 2040 General Plan contains an agricultural land use designation, thus conversion of agriculture lands may occur under both scenarios. As discussed in Section 4.2, *Agricultural Resources*, the 2040 General Plan would convert land currently in agricultural production to non-agricultural uses. Similarly, Alternative 1 would convert the same agricultural parcels to non-agricultural land uses. Both the 2015 and 2040 General Plans aim to establish a defined community edge with a transition between farmland outside the Town and development in the Town, as well as to minimize land use conflicts with agriculture. However, agriculture would be converted under both this alternative and the proposed 2040 General Plan. Overall long-term agricultural impacts under Alternative 1 would be similar to the 2040 General Plan and would be significant and unavoidable.

Air Quality

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. In addition, infill development under the 2040 General Plan would incrementally increase density in specified arterial corridors, and would therefore result in higher toxic air contaminant's (TAC) for sensitive receptors near arterial corridors compared to Alternative 1. However, while the 2040 General Plan focuses on alternative transportation and infill development, Alternative 1 would continue the currently planned development pattern throughout the Town with more urban development occurring at the edges of the Town's UGB than the 2040 General Plan. As a result, projected vehicle miles traveled (VMT) at buildout under Alternative 1 would increase compared to 14,038,661 daily VMT (SCTA 2017) anticipated under the 2040 General Plan. Therefore, Alternative 1 would result in higher associated air contaminant emissions as compared to the 2040 General Plan. Because the majority of air quality emissions are from mobile sources, overall air quality impacts would be greater under this alternative than under the 2040 General Plan. Impacts would remain significant but mitigable, similar to the 2040 General Plan.

Biological Resources

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. Alternative 1 would continue the existing land use pattern which would result in more urban development occurring at the edges of the Town's UGB than the 2040 General Plan which may

result in conversion of vacant or underdeveloped areas, thus there would be more impacts on sensitive status species and habitats under this alternative as compared to the 2040 General Plan. Compared to the development pattern in Alternative 1, the 2040 General Plan prioritizes infill development in already urbanized areas of the Town, minimizing development in areas of potential preservation as outlined in the Santa Rosa Conservation Strategy. Overall long-term biological impacts under Alternative 1 would be greater than impacts under the 2040 General Plan, but impacts would remain significant but mitigable, similar to the 2040 General Plan.

Cultural Resources

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. The 2040 General Plan would involve infill development in vacant and underutilized parcels in already urbanized areas of the Town, while Alternative 1 would result in more urban development occurring at the edges of the Town's UGB. For example, a large area in the eastern portion of the Town would be downsized to rural residential and therefore involve less development.. Thus, more development along the edges of the Town under this alternative would result in additional impacts to cultural resources as compared to the 2040 General Plan. Overall long-term cultural resources impacts under Alternative 1 would be greater than impacts under the 2040 General Plan, but impacts would remain significant but mitigable, similar to the 2040 General Plan.

Geology and Soils

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. However, because the 2040 General Plan focuses on infill and higher density development it would involve less ground disturbance than Alternative 1. Since ground disturbance under this alternative would be greater than for the 2040 General Plan, impacts related to geology and soils would be slightly higher. However, compliance with existing regulatory requirements and policies would reduce impacts from adverse effects such as ground shaking, liquefaction, and seismic ground failure. Overall long-term geology and soils impacts under Alternative 1 would be similar to impacts under the 2040 General Plan and impacts would remain significant but mitigable.

Greenhouse Gas Emissions

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. However, as discussed in Section 4.6, *Greenhouse Gas Emissions*, policies in the 2040 General Plan promote infill and energy efficient development and provide GHG emissions efficiency thresholds for development in 2030, 2040, and 2050. Therefore, implementation of the 2040 General Plan would reduce overall per capita GHG emissions in Windsor and ensure that the Town's emissions reductions are on the trajectory to meet the state's long term emissions goals. Alternative 1 does not focus on infill or energy efficient development and would thus lead to higher per capita GHG emissions, and would be inconsistent with applicable plans and regulations for reducing GHG emissions. Alternative 1 impacts related to GHG emissions would therefore be greater than those of the 2040 General Plan, and potentially significant.

Hazards and Hazardous Materials

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. Infill development under the 2040 General Plan would increase density in specified arterial corridors, and would therefore result in less ground disturbance than would occur under Alternative 1. Since ground disturbance under this alternative would be greater than for the 2040 General Plan, impacts related to hazards and hazardous materials would be slightly higher. However, compliance with existing regulatory requirements would address potential impacts related to hazards and hazardous materials, and impacts under Alternative 1 would be less than significant, similar to the 2040 General Plan.

Hydrology and Water Quality

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. However, because the 2040 General Plan focuses on infill and higher density development, it would involve less ground disturbance than Alternative 1. Because ground disturbance under this alternative would be greater than for the 2040 General Plan, impacts related to hydrology and water quality would be slightly increased as compared to the 2040 General Plan. However, impacts under Alternative 1 would be subject to the same regulatory requirements (such as NPDES permit requirements) governing runoff and protecting water quality and supply as the 2040 General Plan. Although impacts would be slightly higher under this alternative, they would remain less than significant, similar to the 2040 General Plan.

Land Use and Planning

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. Both the 2040 General Plan and Alternative 1 would provide for the orderly development of Windsor, although under different development scenarios. Neither would physically divide an established community or conflict with an applicable habitat conservation plan or natural community conservation plan. As discussed in Section 4.9, *Land Use and Planning*, the 2040 General Plan would be consistent with all 2040 Plan Bay Area goals and policies. Alternative 1 would retain the Town's current 2015 General Plan and thus would not include policies, such as GHG policies ER-5.1 and ER-5.2, which ensure consistency with Plan Bay Area. Therefore, Alternative 1 would have greater impacts related to land use and planning compared to the 2040 General Plan and impacts would be less than significant with mitigation.

Noise

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. Those residences in the downtown area, along corridors, and in mixed-use areas, or those in proximity to non-residential uses and major transportation corridors that would be developed under the 2040 General Plan could be exposed to higher levels of noise than residences in exclusively residential areas away from major roads. Infill development as described in the 2040 General Plan would increase noise near existing sensitive receptors and place new sensitive receptors in areas with high noise levels. Comparatively Alternative 1 would involve less dense

development and noise sensitive receptors would not be exposed to as high noise levels. Therefore, Alternative 1 would have reduced noise impacts as compared to the 2040 General Plan and impacts would be less than significant with mitigation for construction noise, similar to the 2040 General Plan.

Population and Housing

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. Projected growth under the 2040 General Plan would exceed 2015 General Plan growth projections in 2040 by 2,243 residences and 533housing units. Therefore, Alternative 1 would have reduced impacts from population and residential development as compared to the 2040 General Plan. Neither Alternative 1 nor the 2040 General Plan would displace substantial numbers of people or housing. Impacts related to population and housing would be less than significant and similar to the 2040 General Plan.

Public Services

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in more urbanized areas of the Town. Development facilitated by the 2040 General Plan would increase the Town's population by 2,243 residents as compared to the 2015 General Plan's 2040 projections, and thus demand more public services. However, the 2040 General Plan would redirect growth in the General Plan Area focusing on infill development and development where there are existing utilities. Both Alternative 1 and 2040 General Plan would ensure that public services continue to be provided to the Town commensurate with population growth and need. However, this alternative would not develop the north of Arata Lane and east of Jensen Lane areas to the same density as under the 2040 General Plan. Therefore, the new school and fire station north of Arata Lane anticipated by the 2040 General Plan would not be necessary under Alternative 1. In addition, the increased growth under the 2040 General Plan may require additional public facilities to service Windsor residents as a result of an increased density from infill development (thus a higher concentration or residents in areas of the Town). Alternative 1, with a less dense development pattern and thus less overall population growth, would not require these additional services. Overall, impacts related to public services would be reduced compared to the 2040 General Plan and less than significant, similar to the 2040 General Plan.

Transportation/Traffic

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in more urbanized areas of the Town. Under Alternative 1, seven of the 33 study intersections are projected to operate unacceptably at LOS D or better, which would be a greater impact compared to the 2040 General Plan where 3 of the 33 study intersections would operate at an unacceptable LOS. As discussed in Section 4.14, *Transportation and Traffic*, the buildout of the 2040 General Plan would result in three intersections that would operate deficiently: Old Redwood Highway/Starr Road, Windsor River Road/Bell Road-Market Street, and Old Redwood Highway/Shiloh Road. Two of the intersections that would operate at an unacceptable LOS under this alternative, Windsor River Road/Bell Road-Market Street and Old Redwood Highway/Shiloh Road, would also operate at an unacceptable LOS under the 2040 General Plan. A summary of the intersection level of service calculations at buildout for Alternative 1 is

contained in Table 37 in Section 4.14, *Transportation and Traffic*. Intersections projected to operate unacceptably in 2040 under Alternative 1 are shown in bold in Table 37. Although the reduced development and associated growth would reduce traffic and incrementally reduce queuing in the Town, significant queuing impacts would still occur under this Alternative as continued buildout of the 2015 General Plan would increase traffic on local roadways.

Similar to the 2040 General Plan, this Alternative would ensure that impacts related to air traffic, emergency access, and alternative transportation would be less than significant. Alterative 1 would have greater potentially significant intersection impacts because more intersections would operate at an unacceptable LOS and may require additional mitigation measures. Therefore, Alternative 1 would have greater traffic intersection impacts compared to the 2040 General Plan. In addition, similar to the 2040 General Plan impacts would remain significant and unavoidable as a result of queuing impacts.

Utilities and Services Systems

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. As discussed in Section 4.15, *Utilities and Service Systems*, the 2040 General Plan's potential impacts related to the provision of utilities and service systems would be less than significant. Alternative 1 would lead to less development and associated growth, thus requiring fewer utilities and services. However, less compact development may result in the need for an extension of existing utility infrastructure and services. Because development under Alternative 1 would be less dense than the 2040 General Plan there may be additional impacts from expanded services. Impacts would be greater than the 2040 General Plan and significant but mitigable.

Tribal Cultural Resources

Implementation of Alternative 1 would involve less overall development and associated growth than would occur under the 2040 General Plan, specifically in the more urbanized areas of the Town. The 2040 General Plan would involve more infill development in vacant and underutilized parcels in already urbanized areas of the Town, while Alternative 1 would result in more urban development occurring at the edges of the Town's UGB. Development at the edges of the Town under this alternative rather than infill development would impact more tribal cultural resources. Thus, less development would occur at these areas under the proposed 2040 General Plan compared to Alternative 1. Overall long-term tribal cultural resources impacts under Alternative 1 would be greater than impacts under the 2040 General Plan. Impacts would therefore be increased to a significant but mitigable level.

6.2 Alternative 2: Proposed 2040 General Plan without UGB Renewal and Expansion

Under this alternative the proposed 2040 General Plan would be adopted, but this alternative assumes that the Urban Growth Boundary (UGB) renewal and expansion would not be approved by voters in the November 2017 election. Thus, while the land use map and designations would be the same under this alternative as the proposed 2040 General Plan inside the Town limits, the UGB would not exist in the future. Rather the Town's Sphere of Influence would be the mechanism that controls the extent of development and ensures orderly growth of the Town outside of the existing

Town limits. Development on parcels located outside of the Town limits but within the Sphere of Influence (SOI) is assumed to occur according to the Town's land use designations in the 2040 General Plan. Thus overall development and growth would be similar to the proposed 2040 General Plan, except that the UGB expansion area (the approximately 22.5 acres as shown on Figure 2 General Plan Area) would not be developed in the same manner as assumed in the 2040 General Plan. The UGB expansion area which is outside the Town limits and the current SOI, includes three parcels located immediately contiguous to the southwestern boundary of the Town, south of Shiloh Road and west of Skylane Boulevard. Under this alternative these three parcels would remain under the Sonoma County land use designation Diverse Agriculture and would therefore involve minimal development.

6.2.2 Impact Analysis

Aesthetics

Development within the Town limits and SOI would have the same impacts to aesthetics as the 2040 General Plan since development in the Town under this alternative would be the same as envisioned in the 2040 General Plan. Mitigation for lighting in Section 4.1, *Aesthetics*, would still apply to Alternative 2. Under Alternative 2 there would be no development in the UBG expansion area and therefore no impacts to aesthetics or from light and glare in this area. Therefore, Alternative 2 would have reduced potential impacts to aesthetics compared to the 2040 General Plan. Impacts would remain less than significant with mitigation, similar to the 2040 General Plan.

Agriculture

Development within the Town limits and SOI would have the same impacts to agriculture as the 2040 General Plan since development in the Town and the existing SOI under this alternative would be the same as envisioned in the 2040 General Plan. Development under Alternative 2 would not convert the UGB expansion area at the south end of the Town for light industrial and a potential Junior College expansion site that is designated by the Farmland Mapping and Monitoring Program (FMMP) as Farmland of Statewide Importance (Figure 5). However, Alternative 2 would not avoid impacts from conversion of agriculture in other areas in the General Plan Area. Thus, similar to the proposed 2040 General Plan impacts would remain significant and unavoidable.

Air Quality

Development within the Town limits and SOI would have the same impacts to air quality as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan. Development outside of the Town limits under Alternative 2 would not include the light industrial and Junior College expansion site in the UGB expansion area at the south end of the Town as envisioned in the 2040 General Plan. This would result in fewer construction and operational air contaminant emissions. Additionally, similar to the 2040 General Plan, Alternative 2 would be consistent with the Clean Air Plan because it would be consistent with CAP control measures and goals. For these reasons, overall air quality impacts for Alternative 2 would be reduced as compared to the 2040 General Plan, however impacts would remain less than significant with mitigation, similar to the 2040 General Plan.

Biological Resources

Development within the Town limits and SOI would have the same impacts to biological resources as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan and Biological Resources mitigation measures would apply to Alternative 2. The great majority of the UGB expansion area's vegetation community is categorized as cropland with a small amount Lacustrine (Figure 7). The area is also potentially Critical Habitat for the California tiger salamander (Sonoma) (See Figure 8). Overall long-term biological impacts under this alternative would be less than the 2040 General Plan due to less planned ground disturbance within the UGB expansion area and impacts would remain less than significant with mitigation, similar to the 2040 General Plan.

Cultural Resources

Development within the Town limits and SOI would have the same impacts to cultural resources as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan and Cultural Resources mitigation measures for undiscovered cultural and paleontological resources would still apply to Alternative 2. With this alternative, the UGB proposed expansion area at the south end of Town for light industrial and a potential Junior College expansion site would not be developed. This expanded area has been identified as high for paleontological sensitivity (Figure 10) and contains several known cultural resources as discussed in the Windsor UGB Renewal and Expansion IS-MND (SCH No. 2017052023). Therefore, long term cultural resource and paleontological impacts under Alternative 2 would be less than impacts under the 2040 General Plan since the UBG expansion area would not be developed. Nevertheless, impacts would remain less significant with mitigation, similar to the 2040 General Plan.

Geology and Soils

Development within the Town limits and SOI would have the same impacts to geology and soils as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan and Geology and Soils mitigation would still apply. The UGB expansion area at the south end of Town for light industrial and a potential Junior College expansion site under the proposed 2040 General Plan would not be developed under this alternative and thus would have no geologic impacts. Therefore, geology and soils impacts under Alternative 2 would be less than impacts under the 2040 General Plan. However impacts would remain less than significant with mitigation, similar to the 2040 General Plan.

Greenhouse Gas Emissions

Development within the Town limits and SOI would have the same impacts to GHG emissions as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan. The UGB expansion area at the south end of Town proposed in the 2040 General Plan for light industrial and a potential Junior College expansion site would not be developed with this alternative, and thus would not have GHG-related construction or operational impacts. Overall, Alternative 2 would be consistent with applicable plans and regulations for reducing GHG emissions and would reduce emissions compared to the 2040 General Plan since the UBG expansion area would not be developed. GHG impacts under Alternative 2 would

be less than under the 2040 General Plan and impacts would remain less than significant, similar to the 2040 General Plan.

Hazards and Hazardous Materials

Development within the Town limits and SOI would have the same impacts to hazardous materials as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan. The UBG expansion area at the south end of Town which has been identified for light industrial use and a potential Junior College expansion site under the proposed 2040 General Plan would not be developed under this alternative and thus would have no hazardous materials impacts from operation. Compliance with existing regulatory requirements would address potential impacts related to hazards and hazardous materials within the rest of the SOI. Therefore, hazardous materials impacts under Alternative 2 would be less than under the 2040 General Plan due to no development in the UGB expansion area and impacts would remain less than significant, similar to the 2040 General Plan.

Hydrology and Water Quality

Development within the Town limits and SOI would have the same impacts to hydrology and water quality as the 2040 General Plan since development in the Town under this alternative would be the same as envisioned in the 2040 General Plan. The UGB expansion area at the south end of Town which has been identified for light industrial use and a potential Junior College expansion site under the proposed 2040 General Plan would not be developed under this alternative and thus would have no hydrology impacts from erosion, runoff, flooding and water quality. The southern portion of the expansion area is designated as a 100-year flood zone, which would not be developed under Alternative 2. Development under Alternative 2 would be subject to the same existing regulatory requirements (such as NPDES permit requirements) governing runoff and protecting water quality and supply. Therefore, hydrology and water quality impacts under Alternative 2 would be reduced compared to impacts under the 2040 General Plan due to no development in the UBG expansion area, and impacts would remain less than significant, similar to the 2040 General Plan.

Land Use and Planning

Development within the Town limits and SOI would have the same impacts to land use and planning as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan. Similar to the 2040 General Plan, Alternative 2 would not physically divide an established community or conflict with an applicable habitat conservation plan or natural community conservation plan. As discussed in Section 4.9, *Land Use and Planning*, the 2040 General Plan, and thus Alternative 2, would be consistent with all 2040 Plan Bay Area goals and policies. Overall, Alternative 2 would have similar land use and planning impacts to the 2040 General Plan, and impacts would remain less than significant, similar to the 2040 General Plan.

Noise

Development within the Town limits and SOI would have the same impacts to noise as the 2040 General Plan since development in the Town and SOI under this alternative would be the same as envisioned in the 2040 General Plan, mitigation measures related to construction noise would still apply to Alternative 2. The UGB expansion area at the south end of Town which has been identified

for light industrial use and a potential Junior College expansion site under the proposed 2040 General Plan would not be developed under this alternative and thus there would be no noise impacts from development of the site. Therefore, noise impacts under Alternative 2 would be reduced compared to impacts under the 2040 General Plan due to no development in the UGB expansion area, however impacts would remain less than significant with mitigation , similar to the 2040 General Plan.

Population and Housing

Development within the Town limits and SOI under this alternative would have the same impacts to population and housing as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan. The UGB expansion area at the south end of Town which has been identified for light industrial use and a potential Junior College expansion site under the proposed 2040 General Plan would not be developed under this alternative and thus would not contribute to Town growth. Similar to the 2040 General Plan, Alternative 2 would not displace substantial numbers of people or housing. Therefore, population and housing impacts under Alternative 2 would be reduced compared to impacts under the 2040 General Plan due to no development in the UGB expansion area and impacts would remain less than significant, similar to the 2040 General Plan.

Public Services

Development within the Town limits and SOI would have the same impacts to public services as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan. The UGB expansion area at the south end of Town which has been identified for light industrial use and a potential Junior College expansion site would not be developed and thus would not require any additional public services. Therefore, public services impacts under Alternative 2 would be reduced compared to impacts under the 2040 General Plan and impacts would remain less than significant, similar to the 2040 General Plan.

Traffic and Transportation

Development within the Town limits and SOI would have the same impacts to traffic as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan. Potential impacts under this alternative would still occur at study intersections because traffic at these intersections would be generated from vehicle use within the Town limits and Mitigation Measure T-1 would still apply to Alternative 2. However, impacts under this alternative would be reduced compared to the 2040 General Plan because development in the UBG expansion area would not occur under Alternative 2. Intersection LOS and queuing impacts under this alternative would still occur because development within the Town limits and SOI would be the same as the 2040 General Plan. However, intersection and queuing impacts under this alternative would be slightly reduced as compared to the 2040 General Plan because there would be no development in the expanded UGB area. The proposed expansion area at the south end of Town which has been identified for light industrial uses and a potential Junior College expansion site under the 2040 General Plan would not be developed under this alternative and thus would not contribute to area traffic. Therefore, long term traffic impacts under Alternative 2 would be less than impacts under the 2040 General Plan due to no development in the UGB expansion area. However, the same intersection impacts would occur at three of the 33 intersections in the study area under this alternative and would require Mitigation Measure T-1 to

reduce impacts to a less than significant level. And although traffic would be incrementally reduced without development in the UGB expansion area, traffic queuing on local roadways would still occur, and no feasible mitigation measures are available at four of the intersections. Thus the impact would remain significant and unavoidable, similar to the proposed 2040 General Plan.

Utilities and Service Systems

Development within the Town limits and SOI would have the same impacts to utilities and services systems as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan. The UGB expansion area at the south end of Town which has been identified for light industrial use and a potential Junior College expansion site under the proposed 2040 General Plan would not be developed under this alternative and thus would not require any additional utilities or service systems. Because the UBG expansion area would not be developed under Alternative 2 there would be fewer impacts to utilities and service systems and impacts would be less than significant, similar to the 2040 General Plan.

Tribal Cultural Resources

Development within the Town limits and SOI would have the same impacts to tribal cultural resources as the 2040 General Plan since development in the Town and existing SOI under this alternative would be the same as envisioned in the 2040 General Plan. The UGB expansion area at the south end of Town which is identified for light industrial use and a potential Junior College expansion site under the 2040 General Plan would not be developed under this alternative. Therefore, long term tribal cultural resource impacts under Alternative 2 would be less than impacts under the 2040 General Plan due to no development in the UGB expansion area and impacts would remain less than significant, similar to the 2040 General Plan.

6.3 Alternative 3: New Agriculture Designation, No Mixed-Use Outside of Downtown, Less Overall Growth in Town

This alternative assumes that properties in the Town that are currently in agriculture use and production designated as 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 (see Figure 5 in Section 4. 2, *Agricultural Resources*) would be re-designated to “Agriculture “, a new designation in the General Plan. The proposed Agriculture designation in this alternative would allow agricultural operations and single-family detached residential uses with a density of 0.2 dwelling units per acre. As shown on Figure 5, the majority of the areas designated as Farmland are vacant and underdeveloped lands within the General Plan Area and outside the existing Town limits. This includes properties north of Arata Lane and in the eastern area of Town between Jensen Lane and Vinecrest Road. Under Alternative 3, these parcels would remain primarily vacant and their agricultural uses would continue similar to current conditions through the General Plan’s horizon year. Thus this alternative would avoid the significant and unavoidable impact related to conversion of Farmland to non-agricultural uses (Impact AG-1).

Further, Alternative 3 would remove the following Mixed-Use designations; Boulevard Mixed-Use (BMD) and Neighborhood Center Mixed-Use (NCMU). Mixed-use under this alternative would only occur in the downtown area. The removed mixed-use designations would be replaced with residential or commercial designations consistent with the current designations in the existing 2015 General Plan. Thus, mixed-use would only occur in areas along Old Redwood Highway in the Town Center area.

With the addition of an Agricultural land use designation and the removal of the BMD and NCMU designations under this alternative, areas outside of downtown would not result in as high a density of residential units and commercial developments compared to the proposed 2040 General Plan. Thus, this alternative would reduce the overall net growth in population and employment in Windsor through the year 2040 by approximately 50 percent compared to the proposed 2040 General Plan. Although anticipated net growth would be substantially reduced under Alternative 3, sufficient growth is included to meet the population and employment targets of Plan Bay Area (2017). Nevertheless, due to the reduction in overall growth, this alternative would incrementally reduce traffic on Town and regional intersections and roadways. This would assist in reducing congestion and queuing issues at intersections such that this alternative would also avoid the proposed 2040 General Plan's significant and unavoidable impact to traffic hazards (Impact T-4).

6.3.2 Impact Analysis

Aesthetics

The agricultural land use designation under this alternative would avoid the conversion of Farmland in the General Plan area and would allow very low density development on agricultural land to ensure that agricultural production is not disrupted. Aesthetic impacts would be reduced under Alternative 3 because there would be fewer impacts to scenic vistas and visual character as a result of reduced development and growth in agricultural areas. Similarly, reduced mixed-use development in the Town would result in fewer impacts from light and glare and would reduce impacts to scenic vistas and visual character. However, development under Alternative 3, such as residential development replacing the BMD and NCMU designations, would occur according to the Town standards and Mitigation Measure AES-1 for lighting reduction would still apply. Overall, Alternative 3 would have reduced potential impacts to aesthetics as compared to the 2040 General Plan, but impacts would remain less than significant with mitigation (specifically Mitigation Measure AES-1).

Agriculture

Implementation of an agricultural land use designation under this alternative would allow agriculture operations and single family detached residential uses with a density at 0.2 dwelling units per acre and would substantially reduce the conversion of agricultural land compared to the proposed 2040 General Plan. Thus this alternative would avoid the significant and unavoidable impact related to conversion of Farmland to non-agricultural uses (Impact AG-1). The removed mixed-use designation in much of the Town would have no effect on agricultural resources impacts because there are no agricultural lands in these areas. Overall, Alternative 3 would reduce agricultural impacts as compared to the 2040 General Plan, and impacts would be less than significant.

Air Quality

Alternative 3 would reduce the overall net growth in population and employment in Windsor through the year 2040 by approximately 50 percent compared to the proposed 2040 General Plan. Reduced development would result in reduced construction and operational air contaminant emissions. Overall, Alternative 3 would reduce air quality impacts as compared to the 2040 General Plan, but impacts would remain less than significant with mitigation because Mitigation Measure AQ-1 requiring a construction measure policy would still apply to Alternative 3.

Biological Resources

An agricultural designation and removal of the BMD and NCMU designations outside of Downtown under this alternative would reduce development in the Town through the year 2040 by approximately 50 percent. Less urban development and impervious surfaces with this alternative would reduce impacts to sensitive biological resources as compared to the 2040 General Plan. In addition, goals and policies in the 2040 General Plan would continue to protect valuable habitat and sensitive resources. Overall, biological impacts under Alternative 3 would be less than under the 2040 General Plan. However, impacts would remain less than significant with mitigation because Mitigation Measure BIO-1 to add a policy protecting nesting habitat and Mitigation Measure BIO-2 to update a policy to preserve wildlife movement corridors would still apply to Alternative 3.

Cultural Resources

An agricultural designation and removal of the BMD and NCMU designations under this alternative would reduce development in the Town through the year 2040 by approximately 50 percent. Less urban development and impervious surfaces under this alternative would reduce impacts to cultural and paleontological resources as compared to the 2040 General Plan. In addition, goals and policies in the 2040 General Plan would continue to protect valuable cultural resources. Overall, cultural and paleontological impacts under Alternative 3 would be less than under the 2040 General Plan. However, impacts would remain less than significant with mitigation because Mitigation Measure CR-1 to add a policy for a cultural resources study implementation program and Mitigation Measure CR-2 to add a policy for paleontological resource studies would still apply to Alternative 3.

Geology and Soils

The new agricultural designation and removal of the BMD and NCMU designations under this alternative would reduce development in the Town through the year 2040 by approximately 50 percent. Less development under this alternative would reduce geology and soils impacts as compared to the 2040 General Plan. In addition, compliance with existing regulatory requirements and polices would reduce impacts from adverse effects such as ground shaking, liquefaction, and seismic ground failure. Overall, geology and soils impacts under Alternative 3 would be less than under the 2040 General Plan. However, impacts would remain less than significant with mitigation because Mitigation Measure GEO-1 to add a policy for soil investigation of septic systems would still apply to Alternative 3.

Greenhouse Gas Emissions

The new agricultural designation and removal of the BMD and NCMU designations under this alternative would reduce development in the Town through the year 2040 by approximately 50 percent. Reduced development under this alternative would result in reduced construction, traffic,

and operational GHG emissions compared to the proposed 2040 General Plan. In addition, 2040 General Plan policies that would still apply under Alternative 3 would ensure that the Town's emissions reductions are on the trajectory to meet the states long term emissions goals. Overall, Alternative 3 would reduce GHG and climate change impacts as compared to the 2040 General Plan and would remain less than significant.

Hazards and Hazardous Materials

The new agricultural designation and removal of the BMD and NCMU designations under this alternative would reduce development in the Town through the year 2040 by approximately 50 percent. Less development under this alternative would reduce hazardous impacts as compared to the 2040 General Plan because there would be reduced use of hazardous materials and reduced development near hazardous sites. In addition, compliance with existing regulatory requirements and polices would reduce impacts from adverse effects such as hazardous spills, hazardous emissions near schools, and exposure to wildfires. Overall, hazard and hazardous material impacts under Alternative 3 would be less than under the 2040 General Plan and impacts would remain less than significant, similar to the 2040 General Plan.

Hydrology and Water Quality

The new agricultural land use designation and the removal of the BMD and NCMU designations, under this alternative, would reduce the overall net growth in population and employment in Windsor through the year 2040 by approximately 50 percent compared to the proposed 2040 General Plan. A reduction in development and net growth in the Town would reduce impacts to hydrology as compared to the 2040 General Plan because there would be less impervious surfaces, runoff, erosion, and impacts to water quality. In addition, development under Alternative 3 would be subject to the same existing regulatory requirements (such as NPDES permit requirements) governing runoff and protecting water quality and supply. Overall, hydrology and water quality impacts would be less under Alternative 3 as compared to the 2040 General Plan and impacts would remain less than significant, similar to the 2040 General Plan.

Land Use and Planning

Similar to the 2040 General Plan, Alternative 3 would provide for orderly development in Windsor with the agricultural designation and removal of the BMD and NCMU designations outside of Downtown. Alternative 3 would not divide an established community or conflict with an applicable habitation conservation plan. As discussed in Section 4.9, *Land Use and Planning*, the 2040 General Plan would be consistent with all 2040 Plan Bay Area goals and policies. Alternative 3 would retain 2040 General Plan policies and would thus be consistent with all 2040 Plan Bay Area goals and policies. However, the elimination of mixed-use areas would be counter to SMART growth planning objectives. Overall, land use impacts for this alternative would be similar to the 2040 General Plan and impacts would remain less than significant, similar to the 2040 General Plan.

Noise

The new agricultural designation and removal of the BMD and NCMU designations under this alternative would reduce development in the Town through the year 2040 by approximately 50 percent. Reduced development under this alternative would reduce noise impacts from construction, traffic, and land use operations in the Town. Overall, noise impacts under Alternative

3 would be less than under the 2040 General Plan. However, impacts would remain less than significant with mitigation because Mitigation Measures N-1 and N-2 to add construction noise and vibration control measure policies to the General Plan would still apply to Alternative 3.

Population and Housing

This alternative would reduce the overall net growth in population and employment in Windsor through the year 2040 by approximately 50 percent compared to the proposed 2040 General Plan. Although anticipated net growth would be significantly reduced under Alternative 3, sufficient growth is included to meet the population and employment targets of Plan Bay Area (2017). Therefore, Alternative 3 would be consistent with 2040 AMBAG and SCTA growth projections. In addition, Alternative 3 would not displace a substantial number of people or housing. Overall, population and housing impacts would be less than the 2040 General Plan because the growth projections for Alternative 3 would be similar to the targets of Plan Bay Area and impacts would remain less than significant, similar to the 2040 General Plan

Public Services

This alternative would reduce the overall net growth in population and employment in Windsor through the year 2040 by approximately 50 percent compared to the proposed 2040 General Plan. A reduction in growth would require less demand for public services in the Town as compared to the 2040 General Plan. The north of Arata Lane and east of Jensen Lane areas would not be developed to the same extent as in the 2040 General Plan as a result of the agricultural designation under this alternative. Therefore, a new school and fire station would not be necessary to meet the needs of projected growth north of Arata Lane. Overall, because of the reduction in development under this alternative, public services impacts would be less than the 2040 General Plan and impacts would remain less than significant similar to the 2040 General Plan.

Transportation/Traffic

This alternative would reduce the overall net growth in population and employment in Windsor through the year 2040 by approximately 50 percent compared to the proposed 2040 General Plan. Traffic on Town and regional intersections and roadways would be reduced as a result of reduced growth. This would assist in reducing congestion and queuing issues at intersections such that this alternative would also avoid the significant and unavoidable impact to traffic hazards (Impact T-4). Similarly, impacts related to air traffic and emergency access would also be reduced. Impact T-1 and Mitigation Measure T-1 would still apply to intersections with an unacceptable LOS because impacted intersections are located in Downtown. Overall, as a result of the reduction in development under this alternative, traffic impacts would be reduced compared to the 2040 General Plan but would remain significant but mitigable (with implementation of Mitigation Measure T-1.

Utilities and Services Systems

As discussed in Section 4.15, *Utilities and Service Systems*, the 2040 General Plan's potential impacts related to the provision of utilities and service systems would be less than significant. Alternative 3 would reduce the overall net growth in population and employment in Windsor through the year 2040 by approximately 50 percent compared to the proposed 2040 General Plan Thus, this alternative would reduce the overall net growth in population and employment in Windsor through

the year 2040 by approximately 50 percent compared to the proposed 2040 General Plan. The reduction in growth under Alternative 3 would require less demand for utilities and services for the Town. Because the amount of development under Alternative 3 would be less than the 2040 General Plan there would be fewer utilities impacts, but impacts would remain less than significant similar to the 2040 General Plan.

Tribal Cultural Resources

This alternative would reduce the overall net growth in population and employment in Windsor through the year 2040 by approximately 50 percent compared to the proposed 2040 General Plan Less development under this alternative would reduce tribal cultural resources impacts as compared to the 2040 General Plan. In addition, goals and policies in the 2040 General Plan would continue to protect valuable tribal cultural resources. Overall, tribal cultural resources impacts under Alternative 3 would be less than under the 2040 General Plan and impacts would remain less than significant, similar to the 2040 General Plan.

6.4 Environmentally Superior Alternative

This section compares the impacts of the three alternatives to those of the proposed 2040 General Plan. Table 45 shows whether each alternative would have impacts that are less than, similar to or greater than the 2040 General Plan for each of the issue areas studied.

The No Project Alternative (Alternative 1) would not be considered environmentally superior overall because while it would involve less development and growth, it would result in more ground disturbance than the 2040 General Plan. Further, this alternative does not have an emphasis on mixed-use and smart growth planning principles and the majority of growth and development under this alternative would occur outside of downtown, resulting in continued development at the edges of the Town's UGB. Although Alternative 1 would entail continued growth as dictated by the existing 2015 General Plan, new policies included in the 2040 General Plan, such as those related to aesthetics and cultural resources, would not be adopted. Additionally, under Alternative 1, transportation improvements as part of the 2040 General Plan would not be implemented. Thus daily VMT is anticipated to be greater under this alternative. As a consequence, air contaminant and GHG emissions impacts and traffic impacts would be greater than for the proposed 2040 General Plan. Further, Alternative 1 would not eliminate the significant and unavoidable agricultural impact because agricultural land would still be converted under Alternative 1.

Alternative 2, Proposed 2040 General Plan without UGB Renewal and Expansion, performs similar or better to the 2040 General Plan for all of the environmental resource impact areas. This alternative would result in no development in the proposed expansion area. Therefore, Alternative 2 would result in fewer impacts to the majority of issue areas including agriculture, biological resources, cultural resources, noise, and public services. However, although impacts to agriculture would be reduced under this alternative, Alternative 2 would not eliminate the significant and unavoidable agricultural impact because agricultural land would still be converted under Alternative 2. Similarly, Alternative 2 would not eliminate the significant and unavoidable impact to traffic queuing because development in the Town limits and existing SOI would be the same as under the 2040 General Plan, which is where the queuing impact occurs.

Alternative 3, the New Agriculture Designation, No-Mixed Use Outside of Downtown, and Less Overall Growth in Town Alternative, would perform similar or better than the proposed 2040 General Plan for all issue areas. This alternative would involve substantially less growth and

development overall, and therefore less impacts to environmental resources overall. Alternative 3 would reduce and avoid both the agricultural and traffic significant and unavoidable impacts by creating an agricultural land use designation and reducing growth, and thus traffic, in the General Plan Area.

Based on the information presented herein, Alternative 3 is determined to be the environmentally superior alternative when considering overall environmental impacts relative to the performance metrics. However, the agricultural land use designation is contrary to the goals and objectives of the 2040 General Plan because it eliminates urban development from areas the Town has determined would contribute substantially to a pattern of compact future development, which reduces development occurring at the edges of the Town's UGB and thus reduces development pressure on agricultural lands outside the General Plan Area. Additionally, reduced growth is inconsistent with the goals and vision of the 2040 General Plan, specifically to develop a smart growth model for development that favors a mix of land uses and encourages active living through the development of mixed-use neighborhoods.

After Alternative 3, Alternative 2 is the next most environmentally superior alternative when considering overall environmental impacts relative to the performance metrics. However, as discussed above, although this alternative would reduce overall impacts compared to the proposed 2040 General Plan, it would not avoid the significant and unavoidable impacts to conversion of Farmland or traffic queuing. Table 45 shows a comparison of all three alternatives.

Table 45 Alternative Comparison

Issue	Alternative 1	Alternative 2	Alternative 3
Aesthetics	=/+	= / +	= / +
Agriculture	=	= / +	+
Air Quality	= / -	= / +	= / +
Biological Resources	= / -	= / +	= / +
Cultural Resources	=/-	= / +	= / +
Geology and Soils	=/-	= / +	= / +
Greenhouse Gas Emissions	-	= / +	= / +
Hydrology and Water Quality	=/-	= / +	= / +
Hazards and Hazardous Materials	= / -	= / +	= / +
Land Use and Planning	-	=	=
Noise	=/+	= / +	= / +
Population and Housing	= / +	= / +	= / +
Public Services	= / +	= / +	= / +
Transportation and Circulation	= / -	= / +	+
Utilities and Service Systems	-	= / +	= / +
Tribal Cultural Resources	=/-	= / +	= / +

+ Superior to the proposed project (reduced level of impact)

- Inferior to the proposed project (increased level of impact)

= / + slightly superior to the proposed project in one or more aspects, but not significantly superior

= / - slightly inferior to the proposed project in one or more aspects, but not significantly inferior

+/- Some areas inferior to the proposed project, and some areas superior, but not significantly inferior or superior

= Similar level of impact to the proposed project

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7.2 List of Preparers

This EIR was prepared by the Town of Windsor, with the assistance of Rincon Consultants, Inc. Consultant staff involved in the preparation of the EIR are listed below.

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8 Responses to Comments on the Draft EIR

This section includes comments received during the public review period for the Draft Environmental Impact Report prepared for the Town of Windsor 2040 General Plan. It then includes responses to those comments, and indicates when information has been added to the Final EIR, in response to comments relative to the 2040 General Plan and its environmental effects. Corrections or additional text discussed in the responses to comments are also shown in the text of the Final EIR in ~~strikethrough~~ (for deleted text) and underline (for added text) format.

The Draft EIR was circulated for a 50-day public review period that began on October 20, 2017 and ended on December 8, 2017. The Town of Windsor received 15 comment letters on the Draft EIR as well as an acknowledgement from the State Clearinghouse that the Town has complied with CEQA environmental review requirements. The commenters and the page number on which each commenter's letter appear are listed below. In addition to responses to written responses received, responses are also provided to verbal comments from the Special Joint Town Council and Planning Commission hearing of November 28, 2017. These responses follow the responses to the written comments received.

Letter No.	and Commenter	Page No.
1	Patricia Maurice, California Department of Transportation, District Branch Chief	387
2	Mark Bramfitt, Sonoma Local Agency Formation Commission, Executive Officer	394
3	Brenda L. Tomaras, Tomaras & Orgas, LLP, Attorneys for the Lytton Rancheria of California	400
4	Lois Fisher, Town resident	408
5	Julian Cohen, Town resident	412
6	Natalie Balfour, Airport Business Center, Assess and Project Manager	425
7	Michael Jeffries, Town Resident	431
8	Russell Harding, Town resident	433
9	Lmcabridge, Town resident	435
10	Rosa Reynoza, Town resident	438
11	Mary Ann Bainbridge-Krause, Town resident	442
12	Crystal Belmonte, Town resident	445
13	Rue Furch, Town resident	447
14	Michael Jeffries, Town resident	451
15	Betsy Mallace, Town resident	458
16	Scott Morgan, California State Clearinghouse, Director	464

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number.

The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
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Letter 1

Making Conservation a California Way of Life.

December 4, 2017

SCH # 2016112065
04-SON-2016-00204
GTS ID 2391

Ms. Sheila Wolski
Town of Windsor
Planning Division
P.O. Box 100
Windsor, CA 95462

Town of Windsor General Plan Update – Draft Environmental Impact Report (DEIR)

Dear Ms. Wolski:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced Plan. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans *Strategic Management Plan 2015-2020* targets aim to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the DEIR. Additional comments may be forthcoming pending final review.

Project Understanding

The proposed Plan updates the Town of Windsor's General Plan which was established in 1996. The proposed 2040 General Plan Update (Update) emphasizes infill development within the town limits, allows for limited growth at the town's edge, and supports land uses that are rural and agricultural beyond the town's voter-approved urban growth boundary. New development would occur primarily where existing roads, water, and sewer are in place and in a manner that minimizes the impact of development on existing infrastructure and services. The Update provides the policy framework to guide future development toward land uses that support walking, biking, and transit ridership.

Regional access to and from the Town is provided by US 101, which bisects the Town in a south-north direction with five interchanges at Old Redwood Highway, Arata Lane, Los Amigos Road, Windsor River Road, and Shiloh Road.

Vehicle Trip Reduction

In Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, this project falls under **Place Type 5 Rural and Agricultural Lands – Rural Towns**, which includes settlement patterns with widely-spaced towns separated by farms, vineyards, orchard, or grazing lands, which can significantly affect land uses, character and mobility needs. This place type has a mix of housing, services and public institutions in compact form to serve surrounding rural areas. Given this Place Type and intensification of use, which typically leads to high levels of VMT and corresponding low levels of active transportation, we encourage the implementation of robust Transportation Demand Management (TDM) programs in the Town's Circulation Element. Transportation Demand Management shall apply to new development and includes aggressive trip reduction targets with Lead Agency monitoring and enforcement, the Lead Agency should apply the following TDM elements when reviewing projects to promote smart mobility, reduce regional VMT and traffic impacts to the STN:

- Project design to encourage walking, bicycling, and convenient transit access;
- TDM coordinator;
- Ten percent vehicle parking reduction;
- Transit and trip planning resources such as a commute information kiosk;
- Carpool and vanpool ride-matching support;
- Electrical vehicle (EV) charging stations and designated parking spaces for EVs and clean fuel vehicles; 1.1
- Carpooling incentives and dedicated parking spaces for carpooling employees;
- Secured bicycle storage facilities;
- Bicycles for employees and residents to access nearby destinations;
- Showers, changing rooms, and clothing lockers;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources and bicycle parking incentives; and
- Decrease headway times and improve way-finding on Sonoma County Transit bus routes and the upcoming Sonoma-Marin Area Rail Transit (SMART) station to provide a better connection within the Town, nearby transit stations and regional destinations.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If a given project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on US 101 and other State facilities. These smart growth approaches are consistent with the MTC's RTP/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to Chapter 8 of Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference*,

regarding TDM at the local planning level. The reference is available online at: http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf.
For information about parking ratios, please see MTC's report, Reforming Parking Policies to Support Smart Growth, or visit the MTC parking webpage: http://www.mtc.ca.gov/planning/smart_growth/parking. 1.1 Cont'd

Multimodal Planning

A Priority Development Area (PDA) is located within the Town of Windsor. PDA's are identified by the Association of Bay Area Governments (ABAG) as areas for investment, new homes, and job growth. To support PDA goals, future project(s) should be conditioned to provide connections to existing bike lanes and multi-use trails to facilitate walking and biking to respective residential, commercial, and recreational areas. By providing these connections and configuring streets for alternative transportation modes, the Town will reduce VMT and create multi-modal links to increase ridership for the Sonoma County Transit bus routes and the future Town of Windsor Sonoma-Marin Area Rail Transit (SMART) Station. The Town of Windsor should work with Sonoma County Transit Agency and other entities to provide bus services from the future SMART station at the Sonoma County Airport to downtown Windsor. 1.2

Traffic Impact Fees

Based on project-generated travel demand, please estimate the costs of public transportation improvements necessitated by the proposed Plan; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT. Please provide traffic impact fee matrix and schedule. 1.3

Lead Agency

As the Lead Agency, the Town of Windsor is responsible for all mitigation measures, including any needed improvements to the STN or reduction in VMT in association with the Plan. Any fair share contribution, financing, scheduling, implementation responsibilities and Lead Agency monitoring associated with the Plan should be fully discussed for all proposed mitigation measures. 1.4

Encroachment Permit

Applicants are required to apply for and obtain an encroachment permit for any work within Caltrans right-of-way (ROW) prior to construction. As part of the encroachment permit process, the applicant must provide the appropriate California Environmental Quality Act approval, where applicable, for potential environmental impacts within the ROW. The applicant is responsible for quantifying the environmental impacts of the improvements within Caltrans ROW (project-level analysis) and completing appropriate avoidance, minimization and mitigation measures. 1.5

To apply for an encroachment permit, please complete an encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW, and submit to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website link below for more information: http://www.dot.ca.gov/hq/traffops/developserv/permits.

1.5 Cont'd

Should you have any questions regarding this letter, please contact Stephen Conteh at 510-286-5534 or stephen.conteh@dot.ca.gov.

Sincerely,

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Letter 1

COMMENTER: Patricia Maurice, California Department of Transportation, District Branch Chief

DATE: December 4, 2017

Response 1.1

The commenter states that the 2040 General Plan EIR falls under Place Type 5 Rural and Agricultural Lands – Rural Towns in Caltrans' Smart Mobility 2010.This Place Type leads to high levels of vehicle miles traveled (VMT) and corresponding low levels of active transportation. Therefore, the commenter encourages the implementation of Transportation Demand Management (TDM) programs in the Town's circulation element. The commenter recommends that TDM apply to all new development and include aggressive trip reduction targets with monitoring and enforcement. The commenter provides a list of TDM elements recommended for implementation. Finally, the commenter recommends that TDM programs be documented with annual monitoring reports to demonstrate effectiveness and if a project does not achieve the goals the report should include next steps to reach targets. The commenter states that smart growth approaches are consistent with the Metropolitan Transportation Councils Regional Transportation Plan/Sustainable Community Strategy and would meet Caltrans Strategic Management Plan sustainability goals

As shown in Section 4.14, *Transportation and Traffic*, of the Draft EIR, the 2040 General Plan contains a robust program to manage transportation in the Town. Pages 307 – 308, 313, 316, and 317 – 319 of the Draft EIR list 2040 General Plan policies and measures that assist in the reduction of traffic congestion and promote alternative forms of transportation including bicycle, pedestrian and transit. As discussed in the EIR (page 317), the focus of the proposed 2040 General Plan in terms of transportation is to address a balanced transportation network that will support and encourage walking, bicycling, and transit ridership; conserve energy resources; and reduce greenhouse gas emissions, while continuing to accommodate automobile travel. With implementation of the Circulation Element, the 2040 General Plan would not conflict with adopted policies related to alternative transportation. Further, as discussed in the Draft EIR (page 308), Policy M-3.18 of the General Plan requires the Town to consider the applicability of using transportation performance metrics such as Vehicle Miles Traveled (VMT) and associated thresholds for measuring transportation system impacts. This Policy is implemented by Program M-2, which states that the Town shall review, and update if needed, the General Plan Level of Service standards and policies to be consistent with the California Environmental Quality Act (CEQA) guideline amendments adopted for the implementation of SB 743 (Steinberg, 2013) or other future state legislation. Implementation of the policies and measures from the 2040 General Plan included in the Draft EIR would reduce VMT and promote active transportation consistent with the commenter's suggestion for a TDM program. Policies and measures listed in the 2040 General Plan would result in similar roadway traffic reductions as the recommended TDM programs.

Response 1.2

The commenter states that a Priority Development Area (PDA) is located within the Town of Windsor and that a PDA is defined as an area of investment, new homes, and job growth. The commenter states that to support PDA goals future projects should be conditioned to provide active transportation to residential, commercial, and recreational areas. The commenter recommends that the Town work with Sonoma County Transit Agency and other entities to provide bus services from

the Sonoma-Marin Rail Transit (SMART) Station at the Sonoma County Airport to downtown Windsor.

As shown in Section 4.14, *Transportation and Traffic*, of the Draft EIR page 317 lists 2040 General Plan policies and implementation programs that would enhance multimodal transportation and complete streets in order to accommodate anticipated growth and development in the Town. As shown in the Draft EIR, three policies (Policy M-1.1, Policy M-4.13, and Policy M-5.2) involve collaboration with the local bus services and planning for the SMART station in Windsor as well as coordination with the surrounding region (including near the Sonoma County Airport). The listed 2040 General Plan policies and implementation programs would provide alternative transportation modes for the Town and impacts related to alternative transportation are less than significant.

Response 1.3

The commenter requests an estimate for costs of public transportation improvements and viable funding sources and/or transportation impact fees with a traffic impact fee matrix and schedule. The commenter encourages fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. Finally, the commenter supports measures to increase sustainable mode shares, thus reducing VMT.

The Town has adopted a Traffic Impact Fee (TIF), which was last updated under Resolution No. 2736-10. Proposals to update the TIF were recently received by the Town, and this work will begin in the near future. In addition, 2040 General Plan Policy M-9.3 on page 308 of the Draft EIR states that "transportation infrastructure improvements necessary to accommodate future growth under buildout of the General Plan shall be funded through Traffic Impact Mitigation Fees". As shown in Section 4.14, *Transportation and Traffic*, of the Draft EIR, General Plan policies and implementation programs shown on page 307 – 308, 313, 316, and 317 – 319 would enhance multimodal transportation and complete streets in the Town. These policies and implementation measures would increase sustainable mode shares, thus reducing VMT.

Response 1.4

The commenter states that the Town of Windsor is responsible for all mitigation measures and any financing, scheduling, implementation responsibilities and monitoring associated with implementation of the General Plan.

As required by the CEQA Guidelines Section 15097, the 2040 General Plan EIR must prepare a Mitigation Monitoring and Reporting Program (MMRP) to "ensure that mitigation measures and project revisions identified in the EIR are implemented." The MMRP, included as Appendix F to the Final EIR, includes all mitigation measures listed in the EIR, actions required, timing and frequency of each measure, and the responsible agency for each measure. The MMRP identifies the responsibility for each mitigation measure and the timing of when implementation is necessary. Further, in order ensure financing, scheduling and implementation of transportation infrastructure improvements, Policy M-9.3 requires that the Town identify those transportation infrastructure improvements that are necessary to accommodate future growth envisioned by the General Plan and that the cost for providing needed infrastructure should be shared by new development through Traffic Impact Mitigation Fees collected and administered by the Town. The TIF program (as described in Response 1.4) would ensure the Town finances, schedules and implements traffic infrastructure associated with the General Plan. As noted in Response 1.4, the TIF is in the process of being updated to match the public improvements included in the General Plan.

Response 1.5

The commenter states that applicants are required to apply for and obtain encroachment permits for any work within the Caltrans right-of-way prior to construction. The commenter provides the process for applying for an encroachment permit, which includes CEQA approval.

As a programmatic document, the Draft EIR presents a Town-wide assessment of the impacts of the proposed 2040 General Plan and does not analyze site-specific impacts and permit requirements of individual projects. Precise project designs and locations associated with buildout of the 2040 General Plan are not known at this time. All projects affecting Caltrans facilities resulting from buildout of the 2040 General Plan would be subject to Caltrans regulations, but their specific impacts cannot be determined until project designs are completed. Specific environmental analysis (including CEQA review) of individual projects that would occur as a result of buildout of the 2040 General Plan will be undertaken and the need for Caltrans encroachment permits will be identified prior to each project being considered for approval.

SONOMA LOCAL AGENCY FORMATION COMMISSION
575 ADMINISTRATION DRIVE, ROOM 104A, SANTA ROSA, CA 95403
(707) 565-2577 FAX (707) 565-3778
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December 7, 2017

Letter 2

Sheila Wolski
Community Development Technician
Town of Windsor
Planning Division
P.O. Box 100
Windsor, CA 95492

Re: 2040 General Plan Draft Environmental Impact Report

Dear Ms Wolski:

Thank you to the Town of Windsor for the referral requesting comment from the Sonoma Local Agency Formation Commission (LAFCO) regarding the Draft Environmental Impact Report (DEIR) that has been prepared for the Town of Windsor 2040 General Plan. It is evident that considerable time and resources have been involved in this effort. The DEIR is well organized and thorough, giving the reader valuable information about the planned future of the Town over the next decades.

Sonoma LAFCO has two comments, one on the inclusion of additional territory in the Town's Urban Growth Boundary (UGB) and a second one, on the loss of agricultural lands as part of the 2040 General Plan.

Urban Growth Boundary and Sphere of Influence

Inclusion in the 2040 General Plan of additional territory in the Town's Urban Growth Boundary and recent confirmation of that change by the voters indicates the Town's interest in annexation of that territory. To be eligible for annexation to a city or district, however, territory must be located within the sphere of influence (SOI) of that agency.

Pursuant to state law, LAFCO is the agency with the authority to determine amendment of the sphere of a city or district. "Sphere of Influence" is defined in state law as "a plan for the probable physical boundaries and service area of a local agency, as determined by the commission."

2.1

The Town should be aware that, prior to considering amendment of an agency's SOI, LAFCO typically conducts a Municipal Service Review, which provides information about the agency and analyzes and makes determinations about various factors that might impact the Commission's consideration of the sphere change.

Subsequently, regarding amendment of a sphere of influence, LAFCO must make determinations with respect to the following:

1. The present and planned land uses in the area, including agricultural and open-space lands.
2. The present and probable need for public facilities and services in the area.
3. The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.
4. The existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency.

2.1 Cont'd

Agricultural Policies

The DEIR states that build out of the 2040 General Plan would result in the conversion of active agricultural land, an impact that would be significant and unavoidable.

In that preservation of open space and agricultural land is one of the key purposes of LAFCOs, in accordance with state law, Sonoma LAFCO would look closely at any submitted application that proposes reduction of agricultural land. Section 56377 of the California Government Code states:

> In reviewing and approving or disapproving proposals which could reasonably be expected to induce, facilitate, or lead to the conversion of existing open-space lands to uses other than open-space uses, the commission shall consider all of the following policies and priorities:
>
> (a) Development or use of land for other than open-space uses shall be guided away from existing prime agricultural lands in open-space use toward areas containing nonprime agricultural lands, unless that action would not promote the planned, orderly, efficient development of an area.
> (b) Development of existing vacant or nonprime agricultural lands for urban uses within the existing jurisdiction of a local agency or within the sphere of influence of local agency should be encouraged before any proposal is approved which would allow for or lead to the development of existing open-space lands for non-open-space uses which are outside of the existing jurisdiction of the local agency or outside of the existing sphere of influence of the local agency.

2.2

Further, the Commission's policy, which is attached, notes factors that are considered in the review and approval or disapproval of proposals that may result in the conversion of agricultural land to non-agricultural uses.

Sincerely,

Mark Bramfitt
Executive Officer

Attachment

Policy: Agricultural Lands

Policy

In addition to considering the policies and priorities set forth in Government Code Section 56377 the Commission shall conform to the following policies in reviewing and approving or disapproving proposals that may result in the conversion of agricultural land to non-agricultural uses:

1. Agricultural significance of the subject territory and adjacent areas relative to other agricultural lands in the region.
2. Use of the subject territory and adjacent areas.
3. Whether public facilities for proposed development would be a) sized or situated so as to facilitate conversion of adjacent or nearby agricultural land, or b) extended through agricultural lands that lie between the project site and existing facilities.
4. Whether uses incompatible with adjacent agricultural uses are expected to result from the proposal and whether natural or man-made barriers would buffer adjacent or nearby agricultural lands from the effects of proposed development or other incompatible uses.
5. Whether the subject territory is located within the sphere of influence of a city or district providing sewer and/or water service or within an "Urban Service Boundary" designation of the Sonoma County General Plan.
6. Provisions of applicable general plan open space and land use elements, growth management policies, or other statutory provisions designed to protect agriculture.

2.2 Cont'd

The Commission shall discourage proposals which would likely convert to urban uses those lands identified by the County General Plan as suitable for long-term agricultural or open space use or identified by the Sonoma County Agricultural Preservation and Open Space District Acquisition Plan as a priority for acquisition or protection in cooperation with willing landowners.

Legal Authority

The Legislature provided each LAFCO with the authority to "establish written policies and procedures and exercise its powers...in a manner consistent with those policies and procedures and that encourages and provides planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open-space and agricultural lands within those patterns." (Government Code Section §56300) This policy implements the intended goal of well-ordered growth.

Adopted: 2006
Amended: June 5, 2013

Letter 2

COMMENTER: Mark Bramfitt, Sonoma Local Agency Formation Commission, Executive Officer

DATE: December 7, 2017

Response 2.1

The commenter states that the addition of territory to the Town's Urban Growth Boundary (UGB) must be located within the sphere of influence (SOI) of the Town and that LAFCO has the authority to approve amendments to the Towns SOI. The commenter provides a list of the determinations that LAFCO makes with respect to amending a SOI.

The commenter is correct that the addition of territory to the Town's UGB must be located within the SOI and approved by LAFCO. The Draft EIR discusses coordination with LAFCO in Section 4.10, *Land Use and Planning*. As stated on page 225 of the Draft EIR, Goal LU-9 of the 2040 General Plan is "Coordinate with the County, LAFCO, and others in the implementation of Windsor's desired land use pattern."

During the November 7, 2017 election the Town-sponsored ballot measure to review and expand the Town's UBG with three new parcels was approved by voters. Environmental review for the expansion of the UGB was completed as part of the Town of Windsor Ballot Measure to Review and Expend the Urban Growth Boundary Initial Study-Mitigated Negative Declaration (IS-MND) in April 2017. Future approvals by LAFCO prior to annexation of the UGB expansion area were anticipated in the IS-MND. Under the UGB expansion project, the UGB would be renewed and the SOI reviewed and amended by LAFCO. The IS-MND states that annexation in the future would be subject to LAFCO approval. The Town met with Sonoma LAFCO on August 30, 2016 and January 30, 2017 to discuss review and expansion of the UGB.

As stated on page 23 of the Draft EIR the, "2040 General Plan Update and this EIR anticipate renewal and expansion of the UGB, with the expanded properties being designated for light industrial and public uses. Therefore, this EIR uses the expanded UGB as the land use boundary for the 2040 General Plan and incorporates the expanded UGB's potential development as part of the cumulative potential growth for the entire General Plan Area. A separate CEQA document analyzing potentially significant environmental impacts associated with inclusion of the expansion properties in the UGB and their future development with light industrial and public uses has been prepared and adopted by the Town Council independently from this EIR on June 7, 2017 (Resolution No. 3369-17)." Therefore, specific parcel level analysis of extension of the UGB is not included as part of the 2040 General Plan or Draft EIR, but rather is included as part of the cumulative analysis that analyzes the entire General Plan Area. Detailed environmental analysis of the expansion of the SOI and UGB was already completed in the April 2017 UGB IS-MND that acknowledges that annexation is subject to review and approval by LAFCO as a responsible agency.

Response 2.2

The commenter states that preservation of open space and agricultural land is one of the main purposes of LAFCO and Sonoma LAFCO would look closely at any submitted application that proposes reduction in agricultural land. Additionally, the commenter provides the Commission's Agricultural Policy with factors considered in the review and approval of proposals converting agricultural land.

As discussed on pages 71 to 74 of the Draft EIR, Impact AG-1 would be significant and unavoidable because buildout of the 2040 General Plan would result in the conversion of active agricultural land. As shown on Figure 5 of the Draft EIR, Farmland Mapping and Monitoring Program mapped agricultural land occurs in the north, south, west, and east portions of the General Plan Area. There are currently approximately 720 acres in the General Plan Area mapped as Farmland which includes Farmland of Statewide Importance, Prime Farmland, Farmland of Local Importance, and Unique Farmland.

In the 2015 General Plan (adopted in 1996), the majority of the parcels currently mapped as Farmland, were designated for non-agriculture use. As such, the 1996 EIR for the 2015 General Plan determined that agriculture impacts would be significant and unavoidable due to the potential conversion of agriculture lands to non-agriculture uses and a Statement of Overriding Considerations was adopted as part of the Findings and adoption of the 2015 General Plan. The only land use designation in the existing 2015 General Plan that explicitly states agriculture as permitted is Rural Residential. However, there are no parcels mapped as Farmland that have a Rural Residential designation, as shown below in Table 46. Similarly, the 2040 General Plan only permits agriculture on parcels designated as Rural Residential. However, the implementing Zoning Code for Estate Residential identifies agriculture as an allowable use under the existing 2015 General Plan. Therefore, this analysis assumed that agriculture is permitted on Estate Residential and Rural Residential land uses for both the 2015 General Plan and the 2040 General Plan.

Table 46 below shows the acreages of existing mapped Farmland under the 2015 General Plan, the land use designations of those parcels, and the estimated Farmland that could be preserved (agriculture uses allowed in the land use designation) or potentially converted to non-agriculture land uses.

Table 46 2015 General Plan Farmland Acreage

Land Use Designation	Farmland Acreage (720 Total Mapped FFMP Acres)
Rural Residential (Ag use allowed)	0
Estate Residential (Ag use allowed)	183
Other Urban Uses* (converted to non-ag uses)	(537)
Total 2015 General Plan Farmland Preserved (agricultural use allowed)	**183**

Notes:
*Other Urban Uses include Town Center/Mixed Use, Surrounding Residential/Low-Medium Density Residential, Compact Residential, Rural Commercial, Light Industrial, Service Commercial, High Density Residential, Open Space, Service Commercial, Neighborhood Center/Mixed-Use, Village Residential/Medium Density Residential, and General Business.

As shown in Table 46 there are no parcels mapped as Farmland and designated as Rural Residential in the 2015 General Plan. However, the 2015 General Plan would preserve approximately 183 acres of Farmland designated as Estate Residential. A total of 537 acres mapped as Farmland in the 2015 General Plan is designated as other urban uses (such as residential, commercial or industrial) and thus could result in conversion of Farmland to non-agriculture uses. As noted in the Draft EIR (page 73), the 2015 General Plan EIR concluded that because the land use changes would convert existing agricultural production in the Town's Sphere of Influence, agricultural impacts would be significant and unavoidable.

Table 47 shows the acreages of mapped Farmland under the proposed 2040 General Plan as well as the land use designations of those parcels and the estimated Farmland that could be preserved

(agriculture uses allowed in the land use designation) or potentially converted to non-agriculture land uses. As shown in Table 47 the 2040 General Plan would preserve a total of 299 acres of mapped Farmland, which includes eight parcels, approximately 71 acres, designated as Rural Residential. Therefore, the 2040 General Plan would increase overall acreage of preserved Farmland in the Town from approximately 183 acres under the 2015 General Plan to 299 acres under the 2040 General Plan. Although the 2040 General Plan would preserve 299 acres of Farmland compared to the 183 acres preserved by the 2015 General Plan, impacts related to agriculture would remain significant and unavoidable because approximately 25 acres of Farmland could still be converted to non-agricultural uses under the 2040 General Plan. Thus while the 2040 General Plan would potentially preserve more acres of Farmland for agriculture uses compared to the existing 2015 General Plan, because projected buildout through the year 2040 compared to existing conditions could result in conversion of existing agricultural uses to non-agricultural uses in the General Plan Area, impacts are significant.

Table 47 2040 General Plan Farmland Acreage

Land Use Designation	Farmland Acreage (720 Total Mapped FFMP Acres)
Rural Residential (Ag use allowed)	72
Estate Residential continued (Ag use allowed)	159
Other Urban Uses to Estate Residential[1] (Ag use allowed)	68
Estate Residential to Other Urban Uses[2] (converted to non-ag use)	(25)
Other Urban Uses (converted to non-ag use)	(421)
Total 2040 General Plan Farmland Preserved (agricultural use allowed)	**299**

Notes: Other Urban Uses include Very Low Density Residential, Neighborhood Commercial, Low Density Residential, Gateway Commercial, Public/Quasi-Public, Right-of-Way, Boulevard Mixed-Use, Medium Density Residential, Parks and Recreation, Heavy Industrial, Open Space, Light Industrial, and General Business.
() = loss of Farmland
[1] Includes all parcels designated as other urban uses in the 2015 General Plan that would be designated as Estate Residential in the 2040 General Plan.
[2] Includes all parcels designated as Estate Residential in the 2015 General Plan that would be designated as other urban uses in the 2040 General Plan.

Tomaras & Ogas, LLP

Kathryn Ogas
Brenda Tomaras

Kogas@mtowlaw.com
Btomaras@mtowlaw.com

Letter 3

December 4, 2017

VIA EMAIL: swolski@townofwindsor.com

Sheila Wolski, Community Development Technician
Town of Windsor, Planning Division
P.O. Box 100
Windsor, CA 95492

Re: Lytton Tribe Comments on the Draft Environmental Impact Report for the Town of Windsor General Plan,

Dear Ms. Wolski:

Our firm represents the Lytton Rancheria of California with respect to cultural resources matters. This comment letter is submitted on behalf of the Lytton Rancheria of California (hereinafter, "Lytton Rancheria" or "Tribe"), a federally recognized Indian tribe and sovereign government. The Lytton Tribe is responding to a request by the Town of Windsor for tribal consultation, as outlined in the SB18 and AB52 processes. We submit the following comments to the Draft Environmental Impact Report for the Town of Windsor General Plan. We request that all such comments be part of the official record for the approval of this Project.

REQUESTED TRIBAL INVOLVEMENT AND MITIGATION

The Lytton Tribe is not opposed to this Project; however, it is concerned about any direct, indirect and cumulative impacts build-out of the Town's General Plan may have to cultural resources and tribal cultural resources. The Tribe's primary concerns stem from any proposed impacts on Native American cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as village sites, sacred sites and archaeological items which would be displaced by ground disturbing work on future projects, and on the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of the work. 3.1

The Tribe submits these comments concerning the Project's potential impacts to cultural resources and tribal cultural resources in conjunction with the environmental review

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of the Project and to assist the Town with developing appropriate Mitigation Measures as they relate to Cultural Resources and Tribal Cultural Resources. The Tribe initially notes that there are no Mitigation Measures proposed for Tribal Cultural Resources impacts. While the Tribe understands this is new area, it is importance that all potential impacts be mitigated. The Tribe will suggest possible measures in this comment. 3.2

CR-1A Cultural Resources Study Implementation Program

The following Implementation Program shall be added to the 2040 General Plan:

If the preliminary reconnaissance required under Policy ER-7.10 suggests that significant historic resources, cultural resources, or tribal cultural resources may exist or if there will be substantial ground disturbance by the project, the applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in archaeology and/or an architectural historian meeting the SOI PQS standards in architectural history to complete a Phase 1 cultural resources inventory of the project site (NPS 1983). A Phase 1 cultural resources inventory should include a pedestrian survey of the project site and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC). The technical report documenting the Phase 1 cultural resources inventory shall provide detailed discussion of both the prior studies and any items or artifacts found, and may include recommendations to avoid or reduce impacts to cultural resources. The appropriate tribe(s) shall be consulted regarding evaluation of the results and possible mitigation of any impacts. 3.3

CR-1B

If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines the remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)"of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98. 3.4

TR-1

Mitigation Measure CR-1A shall be applicable on all projects. Where potential Tribal Cultural Resources are encountered or revealed through the Phase 1 Survey, the Town and applicant will consult with the applicable tribe(s) to determine appropriate measures for addressing the resources.

3.5

If you have any questions, please do not hesitate to contact me at (858) 554-0550. Thank you for the opportunity to submit these comments.

Very Truly Yours,

TOMARAS & OGAS, LLP

Brenda L. Tomaras

Attorneys for the Lytton Rancheria of California

Letter 3

COMMENTER: Brenda L. Tomaras, Tomaras & Orgas, LLP, Attorneys for the Lytton Rancheria of California

DATE: December 4, 2017

Response 3.1

The commenter states that the Lytton Rancheria is concerned about any direct, indirect, and cumulative impacts associated with buildout of the 2040 General Plan on cultural and tribal resources. The concerns are related to unique and irreplaceable cultural resources, sacred sites, archaeological items, cultural items, Native American human remains, and other sacred items.

As discussed in Section 4.5, *Cultural Resources*, on pages 130 to 137 of the Draft EIR, impacts to cultural resources were determined to be less than significant with mitigation. Mitigation Measures CR-1 and CR-2 require a cultural resources study implementation program and paleontological resources studies to reduce impacts to cultural resources, archaeological, paleontological, and sacred items. Impacts to human remains were determined to be less than significant because 2040 General Plan Policy ER-7.4 would require compliance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.95 and consultation with the Native American Heritage Commission. Additionally, as discussed in Section 4.16, *Tribal Cultural Resources*, on page 340 of the Draft EIR, 2040 General Plan Policy ER-7.6 would require compliance with SB 18 and AB 52 by consulting with Native American tribes during development. These mitigation measures and policies would reduce the direct, indirect, and cumulative cultural impacts associated with buildout of the 2040 General Plan.

Response 3.2

The commenter notes that there are no mitigation measures proposed for tribal cultural resources impacts and that it is important for all impacts to be mitigated. Section 4.16, *Tribal Cultural Resources*, determined that impacts related to tribal cultural resources would be less than significant with the implementation of 2040 General Plan goals and policies. Relevant 2040 General Plan goals and policies cited in Section 4.16 on pages 339 through 340 of the Draft EIR include Goal ER-7 to identify and preserve cultural resources, Policy ER-7.3 Protection of Native American Cultural Resources, Policy ER-7.4 Treatment of Remains (please see Response 3.5), and Policy ER-7.6 Compliance with SB 18 and AB 52. Implementation of these goals and policies would reduce impacts from buildout of the 2040 General Plan on tribal cultural resources and mitigation would not be required. However, as discussed in Response 3.4 and 3.5 Mitigation Measures CR-2 and CR04 have been added to the Final EIR to ensure that impacts to tribal cultural resources would be further reduced to a less than significant level.

Response 3.3

The commenter recommends changes to the language of Mitigation Measure CR-1 to add additional clarification. The suggested text regarding preliminary reconnaissance during ground disturbance has been slightly modified following correspondence with the commenter and added to the Final EIR. Text added to the end of Mitigation Measure CR-1 is language suggested by the commenter

regarding tribal cultural resources under Response 3.5. Section 4.5, *Cultural Resources*, page 133 has been revised to include the following text edits:

CR-1 Cultural Resources Study Implementation Program

The following Implementation Program shall be added to the 2040 General Plan:

If the preliminary reconnaissance required under Policy ER-7.10 suggests that significant historic resources, cultural resources, or tribal cultural resources may exist or for any other project requiring discretionary approval where there will be substantial ground disturbance by the project, the applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in archaeology and/or an architectural historian meeting the SOI PQS standards in architectural history to complete a Phase 1 cultural resources inventory of the project site (NPS 1983). A Phase 1 cultural resources inventory should include a pedestrian survey of the project site and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC). The technical report documenting the Phase 1 cultural resources inventory shall include recommendations to avoid or reduce impacts to cultural resources.

Response 3.4

The commenter recommends a mitigation measure be added to Section 4.5, *Cultural Resources*, Impact CR-3 regarding the discovery of human remains. As shown on pages 136 through 137 of the Draft EIR, impacts to human remains would be less than significant because the 2040 General Plan contains a policy outlining the procedure following the discovery of human remains. However, Mitigation Measure CR-3 as proposed by the commenter has been added as a recommended measure to page 137 of the Final EIR to further reduce impacts to human remains. In addition, Policy ER-7.4 has been modified to include the language proposed by the commenter. Section 4.5, *Cultural Resources*, page 137 and Section 4.16, *Tribal Cultural Resources*, pages 340 and 341 have been revised to include the following text edits:

Environmental Resources Element Policies

Policy ER-7.4 *Treatment of Remains*. ~~Consistent with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98, if human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. The remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains.~~ If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines that remains to be Native American,

the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

Implementation of this policy would help ensure that development carried out under the proposed 2040 General Plan would have a less than significant impact from potential disturbance of human remains, including those interred outside of formal cemeteries.

Mitigation Measures

Impacts would remain less than significant with implementation of applicable goals and policies from the 2040 General Plan. However the following measure is recommended to further reduce impacts to human remains. ~~No mitigation measures are required.~~

CR-4 Human Remains

If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be list in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines that remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

Significance After Mitigation

Impacts to human burials would be less than significant without mitigation~~.~~, however implementation of recommended Mitigation Measure CR-4 would further reduce impacts.

Response 3.5

The commenter recommends a mitigation measure regarding consultation with Native American Tribes be added to Section 4.16, *Tribal Cultural Resources*, Impact TCR-1. As shown on page 339 of the Draft EIR impacts to tribal cultural resources would be less than significant because the 2040 General Plan contains goals and policies that relate to tribal cultural resource protection. The policies are intended to protect Native American cultural resources and require compliance with SB 18 and AB 52, which require Native American consultation for future development projects and for projects that require amendments to the General Plan. However, as suggested by the commenter cultural resources mitigation measures have been added to the Final EIR as recommended measures to further reduce impacts to tribal cultural resources. Section 4.16, *Tribal Cultural Resources*, pages 340 and 341 of the Final EIR have been revised to include the following text edits:

> **Policy ER-7.4: *Treatment of Remains*.** ~~Consistent with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98, if human remains are encountered, no further disturbance shall occur until the County Coroner has made the~~

~~necessary findings as to origin. The remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains.~~ If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines that remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

Policy ER-7.6: *Compliance with SB18 and AB52*. The Town shall continue to comply with SB18 and AB52 by consulting with local Native American tribes on potential disturbance, recovery and preservation of tribal cultural resources, including development of strong consultation protocols with appropriate Native American tribe(s).

With implementation of these goals and policies, potential impacts associated with future development under the General Plan would be less than significant.

Mitigation Measures

No mitigation measures are required because implementation of Policies ER-7.3, ER-7.4, and ER-7.6 from the 2040 General Plan would reduce impacts to a less than significant level by requiring protection of Native American Cultural Resources, proper treatment of Native American human remains, and compliance with state regulations. However the following mitigation measures from Section 4.5, *Cultural Resources*, are recommended to further reduce impacts to tribal cultural resources.

CR-1 Cultural Resources Study Implementation Program

The following Implementation Program shall be added to the 2040 General Plan:

If the preliminary reconnaissance required under Policy ER-7.10 suggests that significant historic resources, cultural resources, or tribal cultural resources may exist or for any other project requiring discretionary approval where there will be substantial ground disturbance by the project, the applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in archaeology and/or an architectural historian meeting the SOI PQS standards in architectural history to complete a Phase 1 cultural resources inventory of the project site (NPS 1983). A Phase 1 cultural resources inventory should include a pedestrian survey of the project site and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search conducted with the Native

American Heritage Commission (NAHC). The technical report documenting the Phase 1 cultural resources inventory shall include recommendations to avoid or reduce impacts to cultural resources.

CR-2 Tribal Cultural Resource Consultation

Mitigation Measure CR-1 shall apply to all discretionary projects. Where potential tribal cultural resources are encountered or revealed through the Phase 1 Survey, the Town will consult with applicable tribe(s) to determine appropriate measures for addressing the resources.

CR-4 Human Remains

If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be list in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines that remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

Significance After Mitigation

Impacts to tribal cultural resources would be *less than significant with* adherence to goals and policies contained in the General Plan Update. However, cultural resources mitigation measures from Section 4.5, *Cultural Resources*, are recommended to further reduce impacts.

Letter 4

General Plan Comments on Transportation and Mobility

by Lois Fisher
November 28, 2017

The General Plan is a great step forward for Windsor.

My concern is that Windsor has built a beautiful and walkable downtown using two lane boulevards (Windsor Road, Windsor River Road and Old Redwood Highway) that are slow moving and allow for a wonderful sense of an 'outdoor room' due to the relationship of the height of the buildings to the width of the street. Windsor Road downtown at the intersection of McClelland Drive is a great example of the type of space that pedestrians love.

4.1

The idea in the General Plan of creating new Boulevard Mixed Use walkable neighborhoods was to replicate the success of downtown walkable environment in a smaller scale in new neighborhoods planned for Windsor. Unfortunately, this General Plan EIR has proposed some streets to be 5-lane boulevards in these planned walkable neighborhoods-over twice the width of the streets in our successful downtown.

There is no way to make pedestrians feel comfortable crossing a 5-lane boulevard. The width alone will create a barrier to a walkable community. It would be a shame if, in the end, an overly wide 5-lane road was not needed, yet we had set all the buildings too far back to create an 'outdoor room'.

4.2

Here are some ideas about options to explore for the proposed 5-lane boulevards:

1. Interim 3-5 lane boulevard: Show a section for the future 5-lane boulevard that is a 3-lane boulevard that includes parallel on-street parking. Show how the parking can be removed to allow for 2 new through lanes if the need arises for higher traffic volumes.
2. Allow a reduction of lanes from five to three based on an updated traffic study prepared at the time that the '5-minute walking circle' neighborhood area is designed and densities are better understood.
3. Have the town relax certain policies such as queuing length on a case-by-case basis. Would roundabouts in key locations help with this?
4. Note possible mitigations that would eliminate the need for the 5-lane boulevard:
    a. Adding a parallel road or roads to the 5-lane boulevard that would connect 'x' point with 'y' point.
    b. If density is reduced in the area or if the proposed land use mix in a certain area is less intense than assumed at the time of the EIR.
    c. Etc.

4.3

These are my suggested revisions for Street Classifications: Page 2-62

Crosstown Streets. This road type performs the function of linking neighborhoods and providing movement across the Town, as well as convenient connections to U.S. Highway 101. In this role, they are designed to carry relatively high traffic flows. There are four types of Crosstown Streets as described below.

a. **Five-Lane Boulevards.** Five-Lane Boulevards serve as major routes across town, providing access to and from U.S. Highway 101 and linking neighborhoods to major destinations. They are designed to carry significant traffic volumes and facilitate transit and bicycle travel. Street parking is typically not provided, but can be in special circumstances. The middle lane is typically a landscaped median that accommodates turning lanes.
b. Interim Three-Five Lane Boulevards,, Show a section for a future 5 lane boulevard that is a 3-lane boulevard that includes parallel on-street parking. The parallel parking can be removed to allow for 2 new through lanes if the need arises. The right-of-way requirements for both the Five-Lane boulevard and the Interim Three-Lane Boulevards are the same.
c. **Three-Lane Boulevards**. Three-Lane Boulevards serve as major routes across town, in some places linking neighborhoods to major destinations. These streets carry mid-range traffic volumes and they are important links to all travel modes. Parallel on street parking is provided. In walkable neighborhoods, design speed is reduced.
d. **Two-Lane Boulevards.** Two-Lane Boulevards serve as major routes across town, in some places linking neighborhoods to major destinations. They provide a key public realm in Windsor and are designed to foster a walkable environment. These streets carry mid-range traffic volumes and they are important links to all travel modes. Parallel on street parking is provided.

4.4

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Letter 4

COMMENTER: Lois Fisher, Town resident

DATE: November 28, 2017

Response 4.1

The commenter states that Windsor has a walkable downtown and is concerned that the 2040 General Plan has proposed some streets to be five lane boulevards in planned walkable neighborhoods.

While there are a number of five lane roadways that currently exist in the Town, the proposed five lane roadway segments discussed in the 2040 General Plan Transportation and Mobility Element were determined based on traffic modeling for the 2040 General Plan, which assumes projected buildout of the General Plan Area and therefore a higher intensity of development than what may actually occur. The traffic modeling results demonstrate that the Town should plan for the possible need for five lanes in certain areas, generally around freeway intersections, not that the Town must build five lanes. The actual number of lanes would be determined during project specific analysis conducted as development occurs or as capital improvements are planned. The Draft EIR is a programmatic document that analyses the cumulative buildout of the entire General Plan Area, not individual projects. Therefore, identifying which roadways may require five lanes in the future is a more conservative approach and appropriate for the Draft EIR's program-level analysis.

However, Policy M-3.25 has been added to the 2040 General Plan and to pages 319 and 308 of the Final EIR describing that areas in the General Plan Area identified for development of five lane road segments would allow for interim road improvements of less than five lanes until it becomes necessary (if ever) that five lanes would be required after it has been concluded that other options would not be effective in reducing traffic volumes. This added policy would not alter the impact analysis contained in the Draft EIR but rather clarifies the development of potential five lane roadways in the General Plan Area over time.

Further, roadway improvements or expansion (adding lanes) would be conducted on a project by project basis during project review, such that improvements or additional lanes to roadway segments would be made incrementally to accommodate the direct impacts of an individual project. It is not the intention of the 2040 General Plan to build five lane roadway segments until and unless it is necessary to accommodate traffic conditions. Additionally, as described on page 317 of the Draft EIR, the focus of the 2040 General Plan in terms of transportation is to address a balanced transportation network to support and encourage walking, bicycling and transit ridership while continuing to accommodate automobile travel.

Response 4.2

The commenter states that five lane roadways are difficult for pedestrians to cross and five lanes create a barrier for a walkable community. Additionally, the commenter states that it would be unfortunate if a five lane roadway was constructed then found to be unnecessary because all buildings would be set too far back.

The traffic modeling from the 2040 General Plan identifies areas that would potentially require five lanes under projected buildout of the 2040 General Plan, which may not occur. Please see Response

4.1. To accommodate the potential need for five lanes it would be prudent for the Town to reserve the right-of-way that is sufficient for five lane roads at the time properties develop. This would provide the Town flexibility to address future traffic conditions if needed. Excess right-of-way acquired through development exactions could be used for angled parking, bicycle lanes, bulb outs, buffers or other pedestrian friendly features in the interim until or if it ever becomes necessary to expand to five lanes to accommodate future traffic conditions.

Response 4.3

The commenter provides several suggestions with alternatives for the areas proposed as five lanes. As noted in Response 4.1, Policy M-3.25 has been added to the 2040 General Plan based on the commenter's suggestions which clarify the potential development of future five lane roadways in the Town. The level of detail suggested by the commenter for five lane roadways is not an appropriate level of detail for the General Plan. Additionally, the intent of the suggestions are already captured in the Complete Streets Design Guidelines for the Town.

Response 4.4

The commenter provides suggested edits to the Street Classifications on Page 2-26 of the 2040 General Plan. Policy M-3.25 has been added to the 2040 General Plan to address five lane roads, please see Response 4.1 and Response 4.3.



Getting serious about cycling

Let's do it as if we mean it.
More bikes mean less cars.
More bikes mean healthy people.

- All over the world there are examples of communities that have created safe experiences for their bike riders. The bike paths of the future have already been created in these communities, and green lines painted on the road are simply not good enough. Nobody seriously wants to use them. In Windsor we have the opportunity to follow all the great design work that has gone before over many decades. On the following pages are visual examples that illustrate solutions.



Riders are well protected on this busy road



Bike path and pedestrian path in a residential neighborhood



Lots of different traffic conditions…simple solution

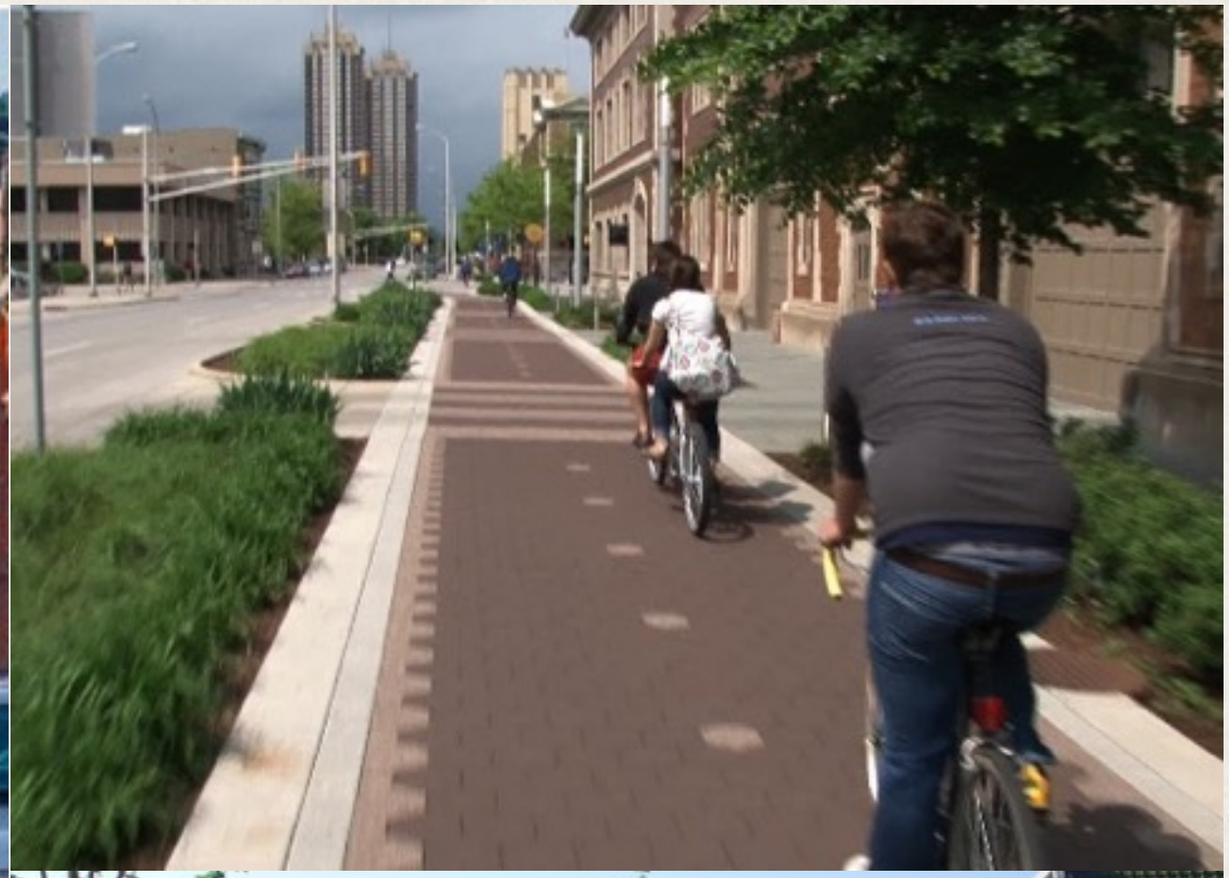


Bikes in a commercial neighborhood



Simple solution on a busy street












bike station



Roundabouts…Not a Problem



Busy intersection…Not a Problem

- So please don't just paint a green line and think the job is done. Our responsibility is to do the best we can for the future health a wellbeing of Windsor. All potential 5 lane roads would be much more innovative as 3 lane roads with delightful biking and walking areas on either side where people can be in community together and connect in different ways.

- And bike paths should link all the vital areas of Windsor to create further reasons for using them.

- Give our town staff the green light to innovate.

- Prepared by Julian Cohen, September 25, 2016

Letter 5

COMMENTER: Julian Cohen, Town resident

DATE: November 29, 2017

Response 5.1

The commenter provided a document "Getting Serious about Cycling," which states that the Town should develop additional bicycle and pedestrian paths instead of five lane roads to link areas of the Town. The document suggests that bicycle and pedestrian improvements would improve traffic conditions.

Regarding traffic conditions and as it relates to five lane roadways, please see Responses 4.1 to 4.4. The traffic modeling from the 2040 General Plan identifies areas that would require five lanes for adequate traffic flow under projected buildout of the 2040 General Plan. Excess right-of-way acquired through development exactions could be used for angled parking, bicycle lanes, buffers or other pedestrian friendly features in the interim before five lanes are needed and these features could be retained if it is determined that five lanes are not required. As described in Response 4.1, it is not the intention of the 2040 General Plan to build five lane roadway segments until and unless it is necessary to accommodate traffic volumes. Further, regarding bicycle and pedestrian paths, the focus of the 2040 General Plan in terms of transportation is to address a balanced transportation network to support and encourage walking, bicycling and transit ridership while continuing to accommodate automobile travel. The 2040 General Plan Transportation and Mobility Element includes a number of policies and implementation programs (as shown on pages 317 to 319 in the Draft EIR) to ensure acceptable access for all modes of transportation. Additionally, Policy M-3.25 has been added to the 2040 General Plan which clarifies the potential development of future five lane roadways in the Town.

November 27, 2017

Letter 6

Town of Windsor Mayor and Council
c/o Kenneth MacNab
Community Development Director
9291 Old Redwood Highway, Building 400
Windsor, CA 95492

RE: Town of Windsor's Draft EIR and specific policies proposed to be implemented into the Town's General Plan Update.

Dear Kenneth,

While reading through the Town's Draft EIR and General Plan Update, Rich Coombs, Larry Wasem and I have one request and a few suggestions that we would like to present to the Town Council.

First, we are requesting a land use designation change for two parcels of land. These two parcels are the land that Charlie's Grill is on, and a small parcel that is located next to the restaurant, with APNs of 164-350-010 and APN 164-350-009, respectively. Currently, both of these parcels are designated with the land use of General Business. We are requesting that both of these parcels be assigned the land use designation of Neighborhood Commercial Mixed Use. This land use designation change would create more opportunity for mixed use development to occur on these properties, and thus in the Town as a whole, which we know is a goal of the Council, and one that we believe we can help them achieve, if this land use change designation request if granted. We are very much looking forward to helping the Council create the best future for our Town, and respectfully ask that this request be granted, as part of that effort. 6.1

Secondly, we noticed a general theme with a number of policies that are being proposed to be implemented into the General Plan, most as a result of the Draft EIR, in an attempt to self-mitigate. We are not debating the general concepts inherent in these policies, but rather that they should not be incorporated into the General Plan. All of the policies below contain very specific information, and reference both State and Federal codes that are likely to change within the next twenty two years. We suggest, instead, that the Town instruct that the below mitigations, currently labeled as policies, are to be implemented at a project specific level, and not adopted into the General Plan. This will allow for the Council to follow changes in both State and Federal codes, as they occur, and remove these encumbering details from the General Plan, allowing it to remain broader in nature, which is, from our understanding, the goal of a General Plan. 6.2

<u>Suggested policies to be removed from the General Plan Update:</u>

1) **LU-12.9 Neighborhood Center Designated Parcels on Old Redwood Highway** (pg. 2-38)

2) **ER-4.3 Air Quality During Construction and Operations** (pg. 2-106)

3) **ER-6.12 Nesting Bird Protection** (pg. 2-114)

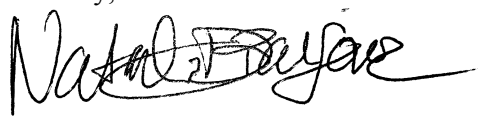
4) **ER-7.4 Treatment of Remains** (pg. 2-115)

5) **PHS-8.18 Construction Noise Control Measures** and **PHS-8.19 Construction Vibration Control Measures** (pg. 2-141)

6) **ER-14 Cultural Resources Study** (pg. 3-37)

As we cannot attend the meeting in person on November 28th, we hope that our request and suggestions will be conveyed to the Council before that meeting, for their consideration. We believe that we all want the same thing for our Town's future, which will be greatly influenced by this proposed General Plan. We hope to continue what we have been doing so successfully over the last twenty years, and to improve, in any way that we can, over the next twenty two. We humbly ask that the Council consider our request and suggestions, as they stem solely from a desire to help provide the Town of Windsor with its best possible future.

Sincerely,



Natalie Balfour
Airport Business Center
Asset and Project Manager

Letter 6

COMMENTER: Natalie Balfour, Airport Business Center, Asset and Project Manager

DATE: November 29, 2017

Response 6.1

The commenter requests that the land use designations on two parcels in the General Plan Area (APN's 164-350-010 and 164-350-009) be changed from General Business to Neighborhood Commercial Mixed-Use to create more opportunity for mixed-use development.

Changing the land use designation of the two parcels recommended by the commenter would result in denser development because the Neighborhood Commercial Mixed-Use designation permits a higher Floor Area Ratio (FAR) and more dwelling units than the General Business designation. Therefore, if the Town adopts the requested land use changes there could be additional development at the two parcels. Additional development may result in more population or traffic near the two parcels. However, impacts would be minor as the Neighborhood Commercial Mixed-Use designation allows four additional dwelling units per acre and more diverse development as compared to the General Business designation. Goals, policies, and mitigation measures discussed throughout the Draft EIR would remain the same and would reduce any potential impacts that may occur from the change in land use designation. Thus, no additional analysis is the EIR is warranted.

Response 6.2

The commenter states that several of the policies and mitigation measures included in the 2040 General Plan and EIR are an attempt to self-mitigate and recommends that these policies be removed from the 2040 General Plan and added as mitigation measures in the EIR. The commenter notes that these policies and mitigation measures reference specific State and federal codes that are subject to change. The commenter lists certain 2040 General Plan policies and mitigation measures from the EIR and recommends that they become mitigation instead of a suggested policy.

Policy LU-12.9 Neighborhood Center Designated Parcels on Old Redwood Highway relates to the 2040 General Plan not the Draft EIR. As the comment does not question the analysis in or conclusions of the Draft EIR, no response is necessary.

Based on the commenters concerns and review by Town staff, the following policies as recommended in the Draft EIR have been changed to mitigation measures: Policy ER-4.3 Air Quality During Construction and Operations, Policy PHS-8.18 Construction Noise Control Measures, and Policy PHS-8.19 Construction Vibration Control Measures. Section 4.3, *Air Quality*, pages 84 and 86 of the Final EIR has been revised to include the following text edits:

> **IMPACT AQ-1 BUILDOUT OF THE 2040 GENERAL PLAN WOULD RESULT IN THE TEMPORARY GENERATION OF AIR POLLUTANTS DURING CONSTRUCTION, WHICH WOULD AFFECT LOCAL AIR QUALITY. ~~MODIFICATION~~ IMPLEMENTATION OF MITIGATION ~~2040 GENERAL PLAN POLICY ER-4.3~~ TO INCLUDE THE BAAQMD BASIC CONSTRUCTION MITIGATION MEASURES WOULD REQUIRE FUTURE PROJECTS WITHIN THE GENERAL PLAN AREA TO IMPLEMENT MEASURES TO REDUCE CONSTRUCTION EMISSIONS. IMPACTS WOULD BE SIGNIFICANT BUT MITIGABLE.**

Mitigation Measures

Temporary construction impacts associated with development envisioned by the General Plan would be reduced through implementation of Mitigation Measure AQ-1.

AQ-1 Construction Emissions Measures

~~Environmental Resources Policy ER-4.3 shall be updated to read:~~ The Town shall require that development projects incorporate the Bay Area Air Quality Management District (BAAQMD) Basic Construction Mitigation Measures to reduce construction emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$). The Town shall require the following to be adhered to during project construction to reduce air quality impacts.

During construction activities:

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, with priority given to the use of recycled water for this activity when feasible.
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 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 visible emissions evaluator.
8. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

The Town shall also require that development projects incorporate feasible measures that reduce operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$).

Section 4.11, *Noise*, pages 252 through 254 of the Final EIR has been revised to include the following text edits:

Mitigation Measures

Mitigation Measure N-1 would be required to reduce construction noise during working construction hours to the extent feasible.

N-1 Construction Noise Control Measures

~~The following policy shall be added to the Public Health and Safety Element under Goal PHS-8, Noise:~~

~~Policy PHS-8.18~~ ***~~Construction Noise Control Measures.~~*** The following noise control measures shall be included as standard conditions of approval for projects involving construction:

1 Properly muffle and maintain all construction equipment powered by internal combustion engines.

2 Prohibit unnecessary idling of combustion engines.

3 Locate all stationary noise-generating construction equipment such as air compressors as far as practical from existing nearby residences and other noise-sensitive land uses. Such equipment shall also be acoustically shielded.

4 Select quiet construction equipment, particularly air compressors, whenever possible. Fit motorized equipment with proper mufflers in good working order.

5 Residences adjacent to project sites shall be notified in advance by writing of the proposed construction schedule before construction activities commence.

6 The project applicant shall designate a "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint (e.g., starting too early, bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator shall be posted at the construction site.

Mitigation Measures

Mitigation Measure N-2 would be required to reduce construction-related vibration to the extent feasible.

N-2 Construction Vibration Control Measures

~~The following policy shall be added to the Public Health and Safety Element under Goal PHS-8, Noise:~~

~~Policy PHS-8.19~~ ***~~Construction Vibration Control Measures.~~*** The following measures to minimize exposure to construction vibration shall be included as standard conditions of approval for applicable projects involving construction:

1 Avoid the use of vibratory rollers within 50 feet of fragile buildings, which are buildings that are susceptible to damage from vibration.

2 Schedule construction activities with the highest potential to produce vibration to hours with the least potential to affect nearby institutional, educational, and office uses that the Federal Transit Administration identifies as sensitive to daytime vibration (FTA 2006).

3 Notify neighbors of scheduled construction activities that would generate vibration.

Policy ER-6.12 Nesting Bird Protection, Policy ER-7.4 Treatment of Remains, and Policy ER-14 Cultural Resources Study would be added to the 2040 General Plan to mitigate for impacts analyzed in the Draft EIR. The mitigation measures require either a new or revised policy to provide documentation with more specifics for reducing environmental impacts related to the listed issue areas. For example, policies included in the 2040 General Plan require compliance with current process for handling human remains. If any regulations or requirements are changed during the lifetime of the 2040 General Plan individual projects would be required to undergo their own environmental review and require compliance with the most up to date regulations and requirements. Finally, the 2040 General Plan can be amended to include any regulatory changes as applicable. Thus, no changes were made to the Biological Resources of Cultural Resources policies.

Letter 7

Kari Zajac

Subject: RE: Vineyards as firebreaks

From: sam salmon [mailto:mayorsalmon@gmail.com]
Sent: Monday, December 4, 2017 1:58 PM
To: mjjeffries@aol.com
Cc: Ken MacNab <kmacnab@Townofwindsor.com>; John Jansons <jjansons@townofwindsor.com>
Subject: Re: Vineyards as firebreaks

Thank you Michael. I will pass this on to planning staff. I think it is relevant to the General Plan EIR as consistent with a majority of Council wishing fire safety to be considered

Sent from my iPad

On Dec 4, 2017, at 8:47 AM, mjjeffries@aol.com wrote:

> To your point about vineyards being firebreaks, please see the link below.
>
> Michael Jeffries
>
> ---
>
> From: mjjeffries@aol.com
> To: mjjeffries@aol.com
> Sent: 12/2/2017 8:26:50 AM Pacific Standard Time
> Subject: Vineyards as fire breaks
>
> https://fermentationwineblog.com/2017/11/10-stunning-shots-vineyards-stopping-fire-napa-sonoma/
>
> Michael

7.1

Letter 7

COMMENTER: Michael Jeffries, Town Resident

DATE: December 4, 2017

Response 7.1

The commenter provided a link to an article "10 Stunning Shots of Vineyards Stopping Fire in Napa and Sonoma" from Tom Wark's Fermentation Daily Wine Blog posted November 29, 2017. The article discusses that vineyards in the region acted as effective fire breaks during the Tubbs fire, suggesting that vineyards should be preserved in the General Plan Area to prevent fire damage.

Wildfire hazards are discussed in the Draft EIR in Section 4.8, *Hazards and Hazardous Materials*, Impact HAZ-6 on page 190. Page 190 of the Draft EIR references applicable 2040 General Plan policies and discusses fire risk and protection in the General Plan Area. General Plan policies would reduce risks from wildland fires by reducing fire risks in the Town with weed abatement and project proposal review in fire hazard areas (Policies PHS-4.4, PHS-4.6, and PHS-4.7). In addition, 2040 General Plan policies are intended to ensure that the Town is prepared for fires by coordinating fire efforts with Sonoma County and applying mitigation to projects unable to satisfy minimum fire flow requirements (Policies PHS-4.2 and PHS-4.4). Section 4.13, *Public Services*, of the Draft EIR Impact PS-1 discusses the potential demand on fire services and includes applicable 2040 General Plan policies to ensure adequate public facility improvements to meet the Town's needs (Goals PFS-1 and PFS-7). Additionally, the Draft EIR incorporated the Town's Local Hazard Mitigation Plan (LHMP) that was prepared in February 2017 and contains information on wildfire in the Town. Further, as described in Response 2.2, the 2040 General Plan would result in less overall potential conversion of Farmland compared to the 2015 General Plan, which as the commenter suggests, may prevent fire damage. As noted in the Draft EIR, on page 73, the 2040 General Plan would preserve agricultural land surrounding the Town through Policy ER-2.1 to limit the use of farmlands to agricultural activity and Policy ER-2.4 to work with other local agencies to protect farmland. In addition, Policies ED-1.6, ED-3.9, and ED-3.10 would preserve agriculture to expand the agritourism industry. By ensuring the continued use or expansion of agriculture uses, including vineyards, in the General Plan Area or outside the Urban Growth Boundary, these policies would assist in preventing fire risk, as recommended by the commenter.

Additionally, Policies PHS-4.8 Public Warning System and PHS-4.9 Priority Undergrounding have been added to the 2040 General Plan. These policies involve exploring implementation of a public siren or broadcasting system to alert residents in the event of an emergency and prioritizing undergrounding of utilities to minimize hazards along emergency access and evacuation routes.

Letter 8

RECEIVED

DEC 04 2017

TOWN OF WINDSOR

Town of Windsor 2040 General Plan
Draft EIR Public Meeting – November 28, 2017

Comment Sheet

DEADLINE TO SUBMIT COMMENTS: DECEMBER 8, 2017, 5:00 P.M.

Please let us know your concerns so we can address them in the Final Environmental Impact Report.

Name: RUSSELL HARDING

Affiliation: RESIDENT
(resident, businessperson, agency representative, community group member)

Address: 9559 VANCOUVER LN
WINDSOR

Phone: 707 293-4744

Email: HEC1031X@HOTMAIL.COM

Comments:

I APPLAUD THE COUNSEL'S EFFORTS TO PROVIDE BIKE LANES WHEREVER POSSIBLE. I HAVE BEEN A WINDSOR RESIDENT SINCE 1989, AND I HAVE NOTICED AN APPRECIABLE INCREASE IN THE NUMBER OF CYCLISTS IN THE LAST COUPLE OF YEARS. IF YOU BUILD THEM, THEY WILL COME!

8.1 MY CONCERN IS FOR THE LACK OF MAINTENANCE UP IN FOOTHILL PARK. THE TRAILS HAVE BEEN WOEFULLY NEGLECTED FOR MANY YEARS NOW, AND EROSION HAS MADE ABOUT HALF OF THEM LITTLE MORE THAN SHALLOW WASHED-OUT DRAINAGE DITCHES. MEANWHILE, THERE IS NOT SHORTAGE OF MONEY SPENT OF UNNECESSARY SIGNS, WHICH I'M SURE ARE MANDATED BY THE STATE.

ITS A LOVELY PARK AND WIDELY USED BY THE COMMUNITY, BUT IT'S BEING TERRIBLY NEGLECTED AND BASICALLY MISMANAGED.

Rick Harding

Please submit by December 8, 2017 to:
Sheila Wolski
Community Development Technician
Town of Windsor, Planning Division
P.O. Box 100
Windsor, CA 95492
Email: swolski@Townofwindsor.com

Letter 8

COMMENTER: Russell Harding, Town resident

DATE: December 4, 2017

Response 8.1

The commenter applauds the Town Council's effort to provide bicycle lanes but is concerned with the lack of maintenance at Foothill Park. The commenter states that the trails have been neglected, erosion has washed out trails, and there is unnecessary signage along the trail.

Foothill Regional Park is located within the Town of Windsor but as a regional park it is under the jurisdiction of the Sonoma County. Although the park is not owned or managed by the Town it is included in the Windsor Parks and Recreation Master Plan, adopted in June 2017, which includes policies and recommendations to work with the Sonoma County Regional Parks District. The Master Plan works to ensure that adequate parks, facilities, and recreation programs meet the needs of the Town's future residents, employees, and visitors. As stated in Section 4.17.3, *Parks and Recreation*, of the Draft EIR 2040 General Plan Policies PFS-9.15 and PFS-9.16 state that the Town shall continue to increase maintenance efficiencies for parks and trails. These policies in the 2040 General Plan are intended to ensure, to the best of the Town's ability, that parks, including Foothill Park, provide recreational opportunities and amenities for Town residents.

Letter 9

-----Original Message-----
From: Comcast [mailto:lmcbride4@comcast.net]
Sent: Thursday, December 7, 2017 4:32 PM
To: Sheila Wolski <swolski@Townofwindsor.com>
Subject: Community Opinion

As a member of the Windsor community, let the record show that I do not agree with more traffic, more roundabouts, less scenic views, etc. Your job, Town Council, is to protect our town from all of that. I do not want a hotel on the town green. I want to be able to find parking when I go down there. I already avoid the downtown area due to parking. Please do not make it worse. I want green space. I want bucolic. I want freedom to enjoy my home town! 9.1

Letter 9

COMMENTER: lmcbride4@comcast.net, Town resident

DATE: December 7, 2017

Response 9.1

The commenter states that they are not in agreement with more traffic or roundabouts and less scenic views in the Town as a result of the 2040 General Plan. The commenter states that they would not like to see a hotel or reduced parking on in the Town Green.

Future traffic for the Town was based on traffic modeling that assumed projected buildout of the 2040 General Plan. As discussed in Section 4.14, *Transportation and Traffic*, new development facilitated by the 2040 General Plan may increase traffic at certain locations in Windsor. However, policies contained in the 2040 General Plan and implementation of Mitigation Measure T-1 to improve intersections would reduce traffic impacts related to intersection level of service. The Draft EIR only proposed one additional roundabout in the Town. As shown in Mitigation Measure T-2 on page 316 of the Draft EIR impacts at Windsor River Road could be reduced by either extending the left-turn pocket or adding a roundabout. Therefore, it is not guaranteed that a new roundabout would be constructed in the Town under buildout of the 2040 General Plan. Rather, a roundabout is one option to relieve traffic congestion that would be determined on a project level analysis (please see further discussion of project level traffic analysis in Response 4.1).

Regarding, scenic views, the 2040 General Plan would not result in less scenic views as suggested by the commenter. As stated in Section 4.1, *Aesthetics*, on page 52 of the Drat EIR "potential development under the 2040 General Plan could result in an incremental additional loss of scenic open space and mature oak trees that are visible from scenic roadways, especially Highway 101. However, the 2040 General Plan would not allow greater building heights that could obstruct foothill views." Additionally, implementation of 2040 General Plan policies would minimize adverse effects on scenic vistas and resources. As shown on pages 52 to 53 of the Draft EIR, goals and policies in the 2040 General Plan would reduce effects on scenic vistas and resources. Implementation of Policies ER-9.1 through ER-9.5 would minimize degradation of scenic views from Highway 101 and other rural lanes by requiring detailed development review along scenic corridors; preservation of views of foothills, ridgelines, and mature vegetation; and avoidance of sound walls that could obstruct views, to the extent feasible. In addition, the Town would work with Sonoma County to preserve scenic landforms in unincorporated areas surrounding Windsor under Policies ER-9.7 and ER-9.8. These policies would protect existing visual access to distant hillsides and ridgelines, which Policy I.1 in the 2015 General Plan characterizes as an objective on the scenic Highway 101 corridor.

Regarding a hotel and parking at the Town Green, the 2040 General Plan designates parcels surrounding the Town Green as Town Center Mixed-Use, which permits 16 to 32 dwelling units per acre and a FAR of 0.75 to 2.5. This designation accommodates an intensive mix of retail, residential, office, hotel, and entertainment uses in the Town Green and is intended to distinguish the Downtown as a unique and vibrant place where the community can gather to socialize shop, play, and live.

The Draft EIR presents a Town-wide assessment of the impacts of the proposed 2040 General Plan and does not analyze the site-specific impacts and individual projects. Precise project designs are

not known at this time, therefore it cannot be determined if a hotel would be constructed around the Town Green. However, parking impacts would be assessed by the Town once formal project applications with proposed project site plans and designs are submitted for review prior to approval and development occurring. Additionally, Policies in the 2040 General Plan Transportation and Mobility Element would provide additional parking requirements and guidelines to accommodate proposed growth. Specifically Policy M-6.1 to provide adequate parking throughout the Town and Policy M-6.4 to encourage developers and employers to offer programs to reduce parking demand, such as transit passes or other transit enhancements. These parking policies along with the requirements for the Town Center Mixed-Use land use designation would ensure that any new development in Town Green (whether a hotel or other use) would provide adequate parking.

Letter 10

From: Rosa Reynoza [mailto:rosa_reynoza@yahoo.com]
Sent: Thursday, December 7, 2017 2:47 PM
To: Sheila Wolski <swolski@Townofwindsor.com>
Subject: EIR Questions

Hello Sheila,
Here are some of my questions:

1. The first bullet point under project objections is to provide a safe and walable environment. How can 5 lanes be considered safe and walkable. 10.1

2. With the areas that are targeted for 5 lanes, how many of them have street parking currently? Will the street parking remain or go away? If they go away, where then do those cars that park on the street have to go? 10.2

One comment I want to add about street parking is that I notice this is more predominant in low income areas of our town. I am concerned that not enough parking will lead to parking violations and cars being towed that add a burden to our low income residents. Of course it would be nice to know that our apartments and homes have less than 2 cars per unit, but that is not the reality in our community and we should plan for that. Even with a proposed train going through town, this is a farming community where we like our big trucks and families live together for a long time adding more vehicles in our neighborhoods. My major concern is that these types of changes will impact our latin community the most. We will see a reduction of the latin community with this and other changes the town is making. 10.2 Cont'd

3. What I remember from the public feedback was that Alternative 3 was the favorite plan? Is this EIR based on Alternative 3? Is the 2040 plan in line with Alternative 3? If not, why? 10.3

4. How mant acres of AgLand do we currently have? What will it be reduced by if this plan is approved? Do you recommend we add an Ag Zoning ordinance in order to protect this land? 10.4

5. Who would get displaced by Policy LU 12.1 and 12.6? 10.5

Thank you

Letter 10

COMMENTER: Rosa Reynoza, Town resident

DATE: December 7, 2017

Response 10.1

The commenter states that one of the objectives of the 2040 General Plan is to provide a safe and walkable community and asks how five lanes is considered safe and walkable.

The commenter is correct that one of the objectives of the 2040 General Plan is to provide a "safe and walkable environment for residents and visitors" as stated on page 31 of the Draft EIR. Regarding five lanes see Responses 4.1 to 4.4 which describe how identifying which roadways may require five lanes in the future is a more conservative approach and appropriate for the Draft EIR's program-level analysis. Further, as described in Response 4.1, it is not the intention of the 2040 General Plan to build five lane roadway segments until and unless it is necessary to accommodate traffic volumes. Further, the focus of the 2040 General Plan in terms of transportation is to address a balanced transportation network that will support and encourage walking, bicycling and transit ridership while continuing to accommodate automobile travel. The 2040 General Plan Transportation and Mobility Element includes a number of policies and implementation programs (as shown on pages 317 to 319 in the Draft EIR) to ensure acceptable access for all modes of travel. Additionally, Policy M-3.25 has been added to the 2040 General Plan which clarifies the potential future development of five lane roadways in the Town.

Response 10.2

The commenter states street parking is more predominant in low income areas of the Town and is concerned that proposed changes will impact the Town's Latino community. In addition the commenter is concerned that there will not be enough parking and asks which areas target for five lanes already have street parking and if the street parking will remain.

The areas targeted for five lanes in the 2040 General Plan include sections of Old Redwood Highway, Brooks Road South, Arata Lane, and Shiloh Road. There is currently a limited amount of on-street parking permitted on the five lane segments of Shiloh Road, Old Redwood Highway, Arata Lane, and Brooks Road South. The 2040 General Plan contains policies that would provide additional parking to accommodate proposed growth. Specifically Policy M-6.1 seeks to provide adequate parking town wide and Policy M-6.4 encourages developers and employers to offer programs to reduce parking demand, such as transit passes or other transit enhancements. In addition, the 2040 General Plan promotes mixed-use development that is intended to promote walking and active transportation and thus would reduce dependence on personal vehicles that require parking. The new Policy M-3.25 would defer, as long as possible, potential loss of existing street parking. Please see Response 4.1. Finally, the Town's zoning code Section 27.30.040 includes the number of parking spaces required by land use type. The 2040 General Plan in combination with the Town's Zoning Code would ensure that there is sufficient parking to accommodate growth under the 2040 General Plan while also ensuring existing parking standards are maintained to meet the demands (such as in existing neighborhoods that utilize street parking) . For any new development, parking and other circulation impacts would be assessed by the Town once a formal project application with proposed project site plans and designs are submitted for review prior to approval and development occurring.

Response 10.3

The commenter asks if Alternative 3 is the environmentally superior alternative, if the EIR is based on Alternative 3, and if the 2040 General Plan is in line with Alternative 3.

The Draft EIR analyzes the 2040 General Plan as the proposed project and as required by Section 15126(d) of the *State CEQA Guidelines,* the EIR must examine a range of alternatives to the proposed 2040 General Plan. As stated in Section 6, *Project Alternatives*, of the Draft EIR "alternatives provided are intended to reduce or avoid significant and unavoidable impacts. As discussed in Section 4.0, *Environmental Impact Analysis*, the 2040 General Plan would have significant and unavoidable impacts related to agriculture (Impact AG-1) and traffic (Impact T-3). An alternative location for the project as a whole is not possible. However, within Windsor, the alternatives consider different patterns of land use and infrastructure to accommodate forecasted future growth and regional housing needs."

Alternative 3 is different than the 2040 General Plan because Alternative 3 includes an agricultural land use designation and removes the mixed-use designation everywhere in the Town except downtown. As stated on page 368 of the Draft EIR "Alternative 3 is determined to be the environmentally superior alternative when considering overall environmental impacts relative to the performance metrics," because Alternative 3 would avoid the significant and unavoidable agriculture impact (conversion of Farmland) and the traffic impact (queuing). The 2040 General Plan has similarities with Alternative 3 in that the overall vision, goals and policies of the 2040 General Plan are intended to preserve agriculture in the region and to address a balanced transportation network to support and encourage walking, bicycling and transit ridership while continuing to accommodate automobile travel. As discussed in Section 4.2, *Agricultural Resources*, the 2040 General Plan would preserve agricultural land surrounding the Town through Policy ER-2.1 to limit the use of farmlands to agricultural activity and Policy ER-2.4 to work with other local agencies to protect farmland. In addition, Policies ED-1.6, ED-3.9, and ED-3.10 would preserve agriculture to expand the agritourism industry. Additionally, the Rural Residential land use designation in the 2040 General Plan accommodates agricultural operations.

As described in Section 4.14, *Traffic and Transportation*, of the Draft EIR, the 2040 General Plan includes goals, policies, and implementation measures that would reduce traffic in the Town. Policies M-1.1 through M-1.4 promote multimodal transportation to reduce vehicles on area roadways and Policy M-3.12 would require traffic management to address traffic operations, including congestion. Additionally, Policies M-4.1 to M-4.4 listed on page 317 of the Draft EIR would promote active transportation to promote alternative modes of transportation. Thus, the 2040 General Plan would be generally in line with Alternative 3.

Response 10.4

The commenter asks how many acres of agriculture are currently in the General Plan Area and how much agriculture would be reduced as part of the 2040 General Plan. Additionally, the commenter asks if the Town recommends adding an agricultural zoning ordinance to protect agricultural land.

As stated in Table 7 on page 65 of the Draft EIR there are approximately 903 acres of agricultural lands (Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Unique Farmland, and Grazing Land) in the General Plan Area. As shown in Response 2.2, which discusses the changes in agricultural acreage between the 2015 and 2040 General Plans, there are approximately 183 acres of Farmland in the 2015 General Plan and approximately 299 acres of Farmland in the 2040 General Plan that permit agriculture operations. Please see Response 10.3 for

a discussion of goals and policies in the 2040 General Plan designed to enhance agriculture in the General Plan Area. Additionally, the Rural Residential land use designation in the 2040 General Plan permits agricultural operations and as discussed in Response 2.2, the implementing Zoning Code for Estate Residential identifies agriculture as an allowable use under the existing 2015 General Plan, which would remain for the 2040 General Plan. Therefore, this analysis assumed that agriculture is permitted on Estate Residential and Rural Residential land uses for both the 2015 General Plan and the 2040 General Plan. The Town is not considering an agricultural zoning ordinance.

Response 10.5

The commenter asks who would be displaced by 2040 General Plan Policies LU-12.1 and LU-12.6.

Policies LU-12.1 and LU-12.6 are related to the redesign of Old Redwood Highway into an attractive boulevard. As discussed above, the Draft EIR presents a Town-wide assessment of the impacts of the proposed 2040 General Plan and does not analyze the site-specific impacts. Precise project designs are not known at this time and possible displacement along Old Redwood Highway cannot yet be identified. Detailed environmental analysis of individual projects would be undertaken as appropriate prior to each project being considered for approval. Possible displacement would be identified during individual environmental review for projects along Old Redwood Highway when a formal project application has been submitted for Town review.

Letter 11

Kari Zajac

Subject: RE: TWGPU: Bainbridge-Krause Questions regarding EIR 2040 General Plan

From: Mary Ann Bainbridge-Krause [mailto:mary_ann_bainbridge_krause@yahoo.com]
Sent: Friday, December 8, 2017 11:39 AM
To: Sheila Wolski <swolski@Townofwindsor.com>
Subject: Questions regarding EIR 2040 General Plan

Hello, I have several questions regarding the EIR report for the 2040 General Plan.

11.1 1. Why update the General Plan? Why do we have to accept a 2040 General Plan that annexes acreage into the Urban Growth Boundary (Shiloh Road) only for the benefit of Developers?

11.2 2. Why do we need more Commercial development in Windsor? Every shopping center in Windsor currently has rental space available and has for some time.

11.3 3. Why are we referring to and using an **OUTDATED CAL FIRE MAP?** In regard to the recent fires in Sonoma County and now in Los Angeles area, seems we should wait until Cal Fire produces a new fire map for Windsor.

11.4 4. Why are we going ahead to reduce greater loss of scenic resources visible from public viewpoints, when the 2015 General Plan protects these scenic resources?

11.5 5. Why are we destroying Agricultural land for new development in Windsor, when 86% of Windsor Citizens are against this?

11.6 6 .What is wrong with the current 2015 General Plan? Why can't we just renew the current 2015 General Plan?

Thank you,

Mary Ann Bainbridge-
Krause
170 Espana
Way
Windsor, CA 95492

Letter 11

COMMENTER: Mary Ann Bainbridge-Drause, Town resident

DATE: December 7, 2017

Response 11.1

The commenter asks why the General Plan needs to be updated and why the 2040 General Plan annexes acreage into the Urban Growth Boundary (UGB) only for the benefit of developers.

California state law requires that local governments update their general plans periodically (typically every 10-15 years) to reflect the long-term land use values of the community. Additionally, the most recent State general plan guidelines contain many elements and requirements that are not included in the 2015 General Plan. The last General Plan update for Windsor occurred in 1996 and its planning horizon went through the year 2015. As discussed on page 23 of the Draft EIR, the Town proposed renewal and expansion of the UGB that would add 22.5 acres of land. Renewal and expansion of the UGB required approval of a ballot measure by voters, and was approved in the November 2017 election. Therefore, the EIR used the expanded UGB as the land use boundary for the 2040 General Plan. However, the 2040 General Plan itself is not proposing annexation of the additional acreage to the UGB. Rather, the voters made the determination to extend and expand the UGB during the November 2017 election. Therefore, whether or not the Town updates the General Plan, the 2017 UGB ballot measure is a part of the General Plan.

Response 11.2

The commenter asks why Windsor needs more commercial development and states that every shopping center in Windsor has available rental space.

The 2040 General Plan vision includes supporting a vibrant local and regional economy and the guiding principles envision the Town as a place with a balanced mix of residential, commercial, office/professional, and industrial land uses to support a wide range of employment opportunities for its residents as well as primary commercial service areas located in the Downtown, Lakewood, the Shiloh Road corridor, and designated areas along Old Redwood Highway. The need for additional commercial development is supported by the *Windsor General Plan: Market Analysis* (Applied Development Economics 2015).

Response 11.3

The commenter asks why the Draft EIR uses outdated CAL FIRE maps and states that the Town should wait until updated maps are produced for the Town of Windsor.

As discussed in Section 4.8, *Hazards and Hazardous Materials*, of the Draft EIR the California Department of Forestry and Fire Protection (CAL FIRE) determines a fire hazard severity zone based on the potential fire hazard that is expected to prevail there. The CAL FIRE maps in the Draft EIR are the most up to date maps available from CAL FIRE for the Town of Windsor. While CAL FIRE may be seeking to update maps in the region as a result of the Tubbs Fire, it could be several years before the maps are updated, at which time the 2040 General Plan could be amended to include the updates as appropriate. Additionally, Policies PHS-4.8 Public Warning System and PHS-4.9 Priority Undergrounding have been added to the 2040 General Plan. These policies involve exploring

implementation of a public siren or broadcasting system to alert residents in the event of an emergency and prioritizing undergrounding of utilities to minimize hazards along emergency access and evacuation routes.

Response 11.4

The commenter asks why the Town is reducing scenic resources visible from public viewpoints, when the 2015 General Plan protects the scenic resources.

As discussed in Section 4.1, *Aesthetics*, on pages 51 to 54 of the Draft EIR the 2040 General Plan would have a less than significant impact on scenic resources visible from public viewpoints. In addition, please see Response 9.1 regarding scenic views (and that the 2040 General Plan includes goals and policies to protect scenic resources such that no significant impacts would occur).

Response 11.5

The commenter asks why the 2040 General Plan is removing agriculture for new development in Windsor when citizens are against development.

For a full description of how the 2040 General Plan relates to the existing 2015 General Plan regarding conversion of agriculture land, please see Response 2.2. The 2040 General Plan would increase agriculture in the Town allowing agriculture production on approximately 299 acres mapped as Farmland, while the 2015 General Plan permits agriculture on approximately 183 acres mapped as Farmland. Thus, the 2040 General Plan would result in more potential agriculture uses than the existing 2015 General Plan.

Response 11.6

The commenter asks what is wrong with the 2015 General Plan and why it cannot be renewed.

The 2015 General Plan was first adopted in 1996 with several amendments through 2015 and has served its intended purpose and timeframe. California state law requires that local governments update their general plans periodically (typically every 10-15 years) to reflect the long-term land use values of the community. Additionally, the most recent State general plan guidelines contain many elements and requirements that are not included in the 2015 General Plan. Nevertheless, the 2040 General Plan updates the 2015 General Plan and utilizes those existing elements, policies and goals that are still relevant where necessary. Many of the policies and land use designations of the land use map form the 2015 General Plan are retained and carried forward in the 2040 General Plan. However, the 2040 General Plan provides updates that are necessary to ensure compliance with current State law and based on the direction of the Town Council, Planning Commission, and members of the public that occurred during the approximately three year process (which began in 2014) to develop the Draft 2040 General Plan.

Letter 12

Kari Zajac

To: Matthew Maddox
Subject: RE: TWGPU: Belmonte, Crystal re DEIR FW: Windsor2040

From: Crystal Belmonte [mailto:crystal_belmonte@yahoo.com]
Sent: Friday, December 8, 2017 11:51 AM
To: Sheila Wolski <swolski@Townofwindsor.com>
Subject: Windsor2040

Hello,

I am not sure of all of the information in the 394 pages but some of my concerns that I was unable to locate is the potential of widening of Starr Road.
Once the potential Indian reservation is added to the end of Windsor River, vehicles tend to avoid traveling west on Windsor River towards the 101 due to the school and town green traffic so they head down Starr to get to the freeway and that's not including the the traffic due to Cali.
The amount of potential apartments and homes proposed to be built within the next 5 years concerns me with the traffic issues that are already in existence in Windsor.
Does this report take in account all of these projects?

12.1

Thanks,
Crystal

Sent from Yahoo Mail for iPhone

Letter 12

COMMENTER: Crystal Belmonte

DATE: December 8, 2017

Response 12.1

The commenter states that if land is taken into federal trust on behalf of the Lytton Rancheria tribe at developed at the end of Windsor River Road, vehicles would use Starr Road to access Highway 101. The commenter is concerned that the amount of development proposed over the next five years would result in more traffic issues than already exist in Windsor. The commenter asks if the Draft EIR takes into account the proposed new development.

As stated in Section 4.14, *Transportation and Traffic*, on page 283 of the Draft EIR the section "evaluates the potential impacts on the local and regional circulation system that would result from implementation of the 2040 General Plan as well as cumulative development and growth in the region". This includes an analysis of the potential for growth that occurs outside of the Urban Growth Boundary to increase local and regional traffic volumes. As stated on page 284 of the Draft EIR the traffic analysis included Windsor River Road and any development that would occur under buildout of the 2040 General Plan along the roadway as well as future traffic associated with regional growth and travel patterns. This includes potential traffic from the Lytton Tribe area. The 2040 General Plan guides development in the Town over the next 22 years, which includes development over the next five years. However, as a programmatic document the Draft EIR presents a Town-wide assessment of the impacts of the proposed 2040 General Plan and does not analyze the site-specific impacts. Detailed environmental analysis of individual projects would be undertaken as appropriate prior to each project being considered for approval.

Letter 13

December 8, 2017

Comments: Revised Draft Town of Windsor 2040 General Plan and DEIR

To: Sheila Wolski, Community Development Technician
Town of Windsor Planning Division
P.O. Box 100 Windsor, CA 95492
Email: swolski@Townofwindsor.com

Cc: Ken MacNab

From: Rue Furch

Thank you for the opportunity to comment on the Town of Windsor General Plan Update (2040) and the associated Draft Environmental Impact Report. You are to be congratulated for your continuing commitment to creating a desirable community, and your outreach to include the Town's citizens and multiple interests.

DRAFT GP 2040

Page #	Section
2-44	LU 14.1 d. school site A school site ~~shall~~ *may* be identified, in consultation with the Windsor Unified School District, if the School District determines this is an appropriate location for a school *in cooperation with the property owner.*
2-85	PFS-2.4 Cost of New Infrastructure. The Town shall require that costs of improvements to the water system that are necessary for new developments are financed by the property owner and/or developer, *based on determination of nexus of impacts created*.
2-88	PFS-3.11 Cost of New Infrastructure. The Town shall require that costs of improvements to the wastewater and water reclamation system that are necessary for new development are financed by the property owner or developer*, based on determination of nexus of impacts created*.

13.1

Potential typographic and/or formatting corrections:

2-140 PHS-8.13 Flight Approach and Flight Path Agreements. ***(BOLD?)***
PHS-8.14 Airport Expansion and Potential Noise. *(an extra underline?)*
PHS-8.15 Noise Enforcement of State and Federal Standards. "
PHS-8.16 Applicable Standards in the Building Code. "
PHS-8.17 Project and Environmental Review for Noise. "

70 Zoning Ordinance
Opening paragraph 1: " … Section 27.24.020 (Buffering) requires a buffer between new urban development and existing agricultural operations. The buffer must be at least 100 feet wide near row and field crops (e.g., hay and vegetables) and 200 feet from vineyards and orchards (e.g., wine grapes and apples)… " 13.2

This may create confusion when setbacks/buffers are applied. Clarity as to the intention of flexible solutions to mitigate impacts vs hard and fast numeric setbacks would be helpful. As stated the goal is to "encourage continued agriculture" and Policies allow a variety of setback/buffer solutions:

76 Policy ER-2.2 Agricultural Buffers. Proposed new development that would be adjacent to existing agricultural properties should include buffers onsite to protect the continued viability of the neighboring agriculture and to minimize adverse effects of agricultural operations. If the existing agricultural property lies outside the Urban Growth Boundary, then the onsite buffer should be permanent and composed of predominantly native and low water-using species, or other appropriate perimeter screening should be required. The Town should allow and encourage the productive use of buffers for appropriate uses, where legally permissible, such as bike trails, rather than requiring buffers to be idle open space. The size of the buffer will be determined by parcel specific review for all new development adjacent to agricultural property.

315 T-2 Queuing Improvements
Improvements 2 and 3 (see below) conflict with: PFS-10.2 School Siting & Design Criteria to *minimize* crossing major streets.
The following improvements are necessary to mitigate impacts from queuing based on the traffic volumes anticipated under the 2040 General Plan.
• [2] Provide at least 250 feet of stacking space on the eastbound approach to Highway 101 North ramps/Arata Lane when the interchange is modified to provide all of the travel lanes needed to accommodate future volumes. 13.3
• [3] Widen Arata Lane to provide at least 275 feet of stacking space for the left-turn pocket on the eastbound approach to Los Amigos Road.

Perhaps alternative solutions might be considered and/or some flexibility allowed as impact mitigations.

Letter 13

COMMENTER: Rue Furch, Town Resident

DATE: December 8, 2017

Response 13.1

The commenter provides several suggestions to updating policies within the 2040 General Plan. The commenter suggests additions to the following policies: Policies LU-14.1, PFS-2.4, and PFS-3.11. In addition, the commenter provides potential typographic and formatting corrections to the 2040 General Plan.

Additions to the policies listed above would not result in any new or greater impacts in the EIR if the Town were to adopt the suggested policy revisions. The commenter's suggestions would require the cost of new infrastructure to be partially determined based on the nexus of impacts created for Policies PFS-2.4 and PFS-3.11. Revisions to Policy LU-14.1(d) would require cooperation with the property owner and would update the language for consultation with the Windsor Unified School District. Therefore, suggested policy and formatting revisions would not result changes to the impact analysis in the EIR and no additional analysis in the EIR is warranted.

Response 13.2

The commenter recommends that the information in the Town's zoning ordinance regarding agricultural buffers should be clarified for the intention of flexible solutions to mitigate impacts versus hard and fast numeric setbacks. The commenter states that a goal of the 2040 General Plan is to encourage continued agriculture and identifies this language in Policy ER-2.2.

The commenter's suggestion to clarify the information regarding agricultural buffers is part of the Town of Windsor Zoning Ordinance. It is not within the scope of the 2040 General Plan EIR to update the Code of the Town of Windsor. The Draft EIR utilizes the Town's Zoning Ordinance for analysis of the 2040 General Plan, as discussed in the Regulatory Setting on page 70 of the Draft EIR. Additionally, 2040 General Plan Implementation Measure LU-1 requires the Town to review and update the Zoning Ordinance, at which time zoning comments would be considered. Regarding the encouragement of continued agriculture, please see Response 2.2. The 2040 General Plan promotes continued agriculture and increases the acreage of mapped Farmland within the General Plan Area as compared to the 2015 General Plan.

Response 13.3

The commenter states that two of the queuing improvements as part of Mitigation Measure T-2 conflict with Policy PFS-10.2 School Siting and Design Criteria to minimize crossing major streets. The commenter recommends that some alternative solutions or flexibility be considered.

Policy PFS-10.2 relates to siting and design criteria for the Windsor Unified School District and Policy PFS-10.2 is in relation to the placement of new schools in the Town. As a programmatic document the Draft EIR does not analyze project specific impacts, such as the precise location of new schools, but presents a Town-wide assessment of the impacts of the proposed 2040 General Plan. Detailed environmental analysis of individual projects, such as the location of a new school, would be undertaken as appropriate prior to each project being considered for approval. Development of a

new school in the north of Arata area would require additional environmental analysis, which would include consistency with 2040 General Plan policies and mitigation measures.

Letter 14

Kari Zajac

Subject: RE: TWGPU: Jeffries, Michael DEIR comments FW: Significant and unavoidable impacts?

From: mjjeffries@aol.com [mailto:mjjeffries@aol.com]
Sent: Friday, December 8, 2017 2:17 PM
To: Sheila Wolski <swolski@Townofwindsor.com>; Ken MacNab <kmacnab@Townofwindsor.com>; Sam Salmon <mayorsalmon@gmail.com>; Debora Fudge <dlfudge@comcast.net>; Bruce Okrepkie <bokrepkie@gpins.com>; Dominic Foppoli <dominic@christophercreek.com>; Mark Millan <MMillan@Townofwindsor.com>; Scott Huberts <shuberts@townofwindsor.com>; Steve Klick <sklick@townofwindsor.com>; Clay Fritz <cfritz@townofwindsor.com>; Don Albini <dalbini@townofwindsor.com>; Paul Berlant <pberlant@townofwindsor.com>
Subject: Significant and unavoidable impacts?

Dear members of the Town Council and Planning Commission,

I would like to ask a question as to why destroying existing agricultural land, and increasing traffic problems that create "queuing beyond acceptable levels", are considered "unavoidable". I take great exception to that.

It seems to me these are clearly just "choices" that are being made to support development. And if "we" were to make the choice to not support development (at least not to the extent that is written in the 2040 General Plan) then wouldn't we be providing mitigation and be avoiding and/or at least mitigating these significant impacts? Isn't it all a matter of choices? The premise seems to be that we **MUST** develop and therefore these significant impacts are unavoidable. But what I am saying is if the impacts are so significant that they destroy the things we hold most important to us, then why would we not make the choice to avoid them? It seems to me that they are most certainly avoidable! 14.1

Impact AG-1. Development proposed in the 2040 General Plan is designed to encourage the continued operation of existing agriculture in and surrounding the Town.

It seems to me that at least part of it is designed to annex more agricultural land into the Town (specifically the Eastern Edge residential) so it can be developed, and thus remove the continued operation of vineyards and agricultural land that exists today. 14.2

However, buildout of the 2040 General Plan would result in the conversion of active agricultural land. Therefore, impacts would be significant and unavoidable

Aren't "we" talking out of both sides of our mouth here?

That agricultural land (specifically vineyards) protected homes and lives in the recent fires. They were natural firebreaks and that is a statement of fact. Why wouldn't we want to learn from those events and choose to make changes to our plans to ensure the safety and protection of homes and lives in our Town? What values do you hold as most important? Is it protecting agricultural land that could ultimately save lives in another catastrophe, or development? That is a very conscious choice. And I am personally really tired of hearing how the development proposed in the new 2040 General Plan is less than the original General Plan. So what? Do you really want to pat yourself on the back because it's less than it was? And if another catastrophe happens and homes and lives are lost in areas that you chose to develop will you really sleep better knowing that at least it was better than it could have been in comparison to the previous plan? Or will you regret the "choices" you made because you didn't learn the lessons you should have learned from these recent catastrophes? 14.3

Impact T-3. New development facilitated by the 2040 General Plan may increase traffic at certain locations in Windsor. This traffic may have the potential to cause queuing that exceeds available storage area resulting in traffic related hazards. 14.4

Again, isn't this just a choice? Develop less, have less traffic problems. That seems pretty simple and avoidable. I think most Windsor residents would say that traffic is already a problem. Why would we want to intentionally make it worse? And again, what values do we hold most important? Our quality of life, or is development a "value" that is more important? 14.4 Cont'd

MISSION AND VISION FOR THE TOWN OF WINDSOR

On the Town of Windsor website under the "About us" section I found the attached **Mission Statement** which includes the **Windsor Town Council's Vision** and a list of **"Strategic initiatives we are committed to"**.

I won't quote every word but I would like to draw your attention to a few things that this document states you as council members are committed to.

Public Safety - Maintain and promote public safety

Infrastructure and Development - Assure that development occurs **ONLY** as improvements to infrastructure (**streets**,parks, ...) are built. Strive to maintain **SAFE** infrastructure throughout the community. 14.5

Planning - ....achieve a vibrant **pedestrian friendly, transit oriented town** ..... **while preserving our open space and agricultural heritage.**

If these are truly strategic initiatives you are committed to, I ask you, are these really unavoidable impacts?

It seems to me the impact study is telling you that if you proceed with all of the development that is outlined in the 2040 General Plan that you will **NOT** be able to protect our safety, **NOT** be able to provide the appropriate improvements to the street infrastructures needed to achieve a vibrant pedestrian friendly transit oriented town, and **NOT** preserve our open space and agricultural heritage. So the choice to me is do you support the strategic initiatives you say you are committed to and make these impacts avoidable, or do you support the development at any cost even though this study tells you these are significant impacts?

I obviously know that very little will be changed in the 2040 General Plan before being adopted next month. However, as was discussed in the last joint Town Council and Planning Commission meeting, just because something is written into the plan does not mean that it can't be changed, or that it must be acted upon as written. Special area D was in the original plan from 1996 and the development outlined in it wasn't acted upon in the last 20+ years. And I hope that you weigh the results from this impact study and remind yourselves of the strategic initiatives you are committed to in making decisions moving forward. 14.6

I would like to add that I do sincerely appreciate your commitment to ensure that the verbiage that was removed from the Eastern Edge section of the plan regarding the road connecting to the south to Pleasant is reinstated as I spoke to you about at the Council meeting on November 1st. I want to thank you all again for your support on that.

Thank you for hearing my concerns regarding the 2040 General Plan and EIR. I look forward to hearing the answers to my questions thorough your actions in the coming months and years.

Michael Jeffries

Holly Leaf Drive

Letter 14 Attachment

MISSION STATEMENT

The Town of Windsor provides outstanding public services and preserves our small town character for current and future generations.

WINDSOR TOWN COUNCIL'S VISION

The Town Council strives to foster and promote the Town of Windsor as a friendly, family oriented community with an active, involved citizenry, and as a vital and growing community with small town character.

Strategic initiatives we are committed to:

- *Fiscal Health – Manage the Town in a fiscally responsible way while retaining, expanding and attracting business opportunities.*
- *Public Safety – Maintain and promote public safety.*
- *Old Downtown – Preserve Old Downtown as the cultural and civic heart of Windsor.*
- *Recreation – Offer Town events, recreational and community services programs for all ages.*
- *Infrastructure and Development – Assure that development occurs only as improvements to infrastructure (streets, parks, water and water reclamation systems) are built. Strive to maintain safe infrastructure throughout the community.*
- *Planning – Develop and use planning tools to create a strong Town identity and maximize the use of land. Through budget funding and zoning codes and policies, achieve a vibrant pedestrian friendly, transit oriented town capable of providing housing with a mix of incomes while preserving our open space and agricultural heritage.*
- *Customer Service – Keep the community informed of Town activities and operations while serving our citizenry in an effective and efficient way.*
- *Energy – Promote energy efficiency and conservation of natural resources.*
- *Water and Water Reclamation – Maintain high quality drinking water and expand recycled water availability in and outside of Town.*

Letter 14

COMMENTER: Michael Jeffries, Town resident

DATE: December 8, 2017

Response 14.1

The commenter asks why impacts to agricultural land and traffic queuing are significant and unavoidable. The commenter states that choices are being made to support development in the Town and that mitigation should be provided to reduce these impacts and choices should be made to avoid the impacts to these resources that are important to the Town.

As stated on page 74 of the Draft EIR agricultural impacts would be significant and unavoidable because, "there are no mitigation measures available to prevent the loss of Farmland within the General Plan Area." There are conflicting court cases regarding whether or not conservation easements to permanently protect agricultural land is acceptable mitigation for the loss of agricultural land. With its recent publication of draft updates proposed to the *State CEQA Guidelines,* the California Governor's Office of Planning and Research (OPR) takes the position that permanent protection of agricultural land through conservation easements is acceptable mitigation. However, given the unsettled nature with this issue, no changes have been made to the Final EIR or 2040 General Plan as it pertains to the loss of agricultural land. If the draft update of the State CEQA Guidelines are adopted by OPR as proposed, or the issue is clarified in the future by the courts, then new development proposals at that time would be subject to the new *State CEQA Guidelines*.

Applying the adopted *State CEQA Guidelines* potential mitigation measures would not prevent the conversion of existing Farmland to non-agricultural uses. For further discussion regarding the potential conversion of Farmland for the 2040 General Plan compared to the existing 2015 General Plan, please see Response 2.2. The 2040 General Plan would permit agriculture on approximately 299 acres of Farmland, while the 2015 General Plan permits agriculture on approximately 183 acres of Farmland. Therefore, the 2040 General Plan would preserve more mapped Farmland as compared to existing conditions in under the 2015 General Plan. However, because some existing agriculture uses that are mapped as Farmland may be converted to non-agricultural uses under the 2040 General Plan, impacts are considered significant.

Regarding traffic queuing impacts, as stated on page 315 of the Draft EIR, "there are no viable options for achieving adequate stacking space at the following locations due to proximity to another intersection or other limitations on geometrics, so the impact would remain significant and unavoidable.

- Brooks Road (South)/Los Amigos Road westbound approach
- Old Redwood Highway/US 101 South northwestbound (Old Redwood Highway) approach
- Old Redwood Highway/US 101 North Off-ramp-Lakewood Drive southbound (Lakewood Drive) approach
- Hembree Lane/Shiloh Center Drive"

Future traffic volumes for the year 2040 were determined using the Sonoma County Transit Authority (SCTA) regional travel demand model (SCTM\10) to determine future traffic associated with regional growth and travel patterns as well as traffic growth associated with the land uses contained in Windsor's 2040 General Plan. Queuing impacts occur as a result of additional vehicle

trips from buildout of the 2040 General Plan. These additional trips cause the length of stacked cars from the intersection to increase, resulting in a potential traffic hazard for vehicles and/or pedestrians or bicyclists using the roadway. There is not enough space on all impacted roadways to achieve adequate stacking even with mitigation; therefore, impacts would remain significant and unavoidable.

Response 14.2

The commenter states that Impact AG-1 supports continued operation of agriculture but does not avoid significant impacts associated with conversion of agricultural land.

As stated on page 73 of the Draft EIR, "measures listed would serve to preserve existing agricultural land, but would not create new agricultural lands to mitigate for agricultural land lost as a result of development under the 2040 General Plan. Even if the Town were to implement these measures, existing Farmland in the General Plan Area would still be converted to non-agricultural use. Therefore, these measures are not feasible because they would not reduce or avoid the impact associated with conversion of Farmland to non-agricultural uses." As described in Response 2.2, the 2040 General Plan would permit agriculture on approximately 299 acres of Farmland, while the 2015 General Plan permits agriculture on approximately 183 acres of Farmland. However, impacts would remain significant and unavoidable because approximately 25 acres that are mapped Farmland could be converted to non-agricultural uses under the 2040 General Plan and there is no feasible mitigation available for this impact. Please see Response 14.1.

Response 14.3

The commenter states that agricultural land, particularly vineyards, act as natural firebreaks and that the Town should plan to ensure the safety of homes from fire by conserving agricultural land. The commenter states that the Town should prioritize safety over development.

The commenter is correct that vineyards may act as natural firebreaks. Please see Response 7.1 regarding how the 2040 General Plan is intended to ensure that agriculture uses, including vineyards, continue or are expanded in the General Plan Area or outside the Urban Growth Boundary, which would assist in preventing fire risk, as recommended by the commenter. Compared to the 2015 General Plan, the 2040 General Plan creates more opportunity for vineyards to be retained at the edges of the Urban Growth Boundary to act as fire breaks. Compact growth in the 2040 General Plan prevents extending urbanized areas, which would preserve existing agriculture and prevent the loss of agricultural production.

Although the 2040 General Plan supports development within the Town, the 2040 General Plan also contains several policies related to public safety, including wildfire. The 2040 General Plain contains a Public Health and Safety Element with goals, policies, and programs that address the potential for disasters that may affect Windsor and provides guidance on how to minimize hazardous impacts to the community. Additionally, Policies PHS-4.8 Public Warning System and PHS-4.9 Priority Undergrounding have been added to the 2040 General Plan. These policies involve exploring implementation of a public siren or broadcasting system to alert residents in the event of an emergency and prioritizing undergrounding of utilities to minimize hazards along emergency access and evacuation routes. Additionally, as referenced in the Draft General Plan, the Town's Local Hazard Mitigation Plan (LHMP) contains information on wildfire in the Town and will be updated as appropriate over the life of the 2040 General Plan to ensure safety is a priority.

Response 14.4

The commenter states that the Town is making the choice to increase development, which results in traffic issues. The commenter states that the Town should value traffic over development and that there should be less development and therefore impacts from traffic would be less than significant.

The 2040 General Plan is intended to provide a vision for how the Town will accommodate growth and development through the year 2040. The General Plan itself does not propose any development; rather it is intended to provide principles to accommodate growth in line with the Town's vision and goals. The Town's guiding principles stated in the 2040 General Plan include providing a mix of residential, commercial, office/professional, and industrial land uses to support a wide range of employment opportunities for residents and to support development and expansion of new and existing businesses and industries to sustain the community's economy. These guiding principles provide guidance for how the Town will achieve its vision. The commenter is correct that reduced development would result in overall reduced traffic in the Town. As described in Response 4.1, the focus of the 2040 General Plan in terms of transportation is to address a balanced transportation network that will support and encourage walking, bicycling and transit ridership while continuing to accommodate automobile travel. Traffic level of service impacts at intersections would be less than significant with Mitigation Measure T-1 provided on page 311 of the Draft EIR and queuing impacts would remain significant and unavoidable because there is not enough space on all impacted roadways to achieve adequate stacking as discussed on page316 of the Draft EIR.

Response 14.5

The commenter quotes the Town's existing Mission Statement and the Town's Vision and states that the Town is not committed to the Mission Statement if there are significant and unavoidable impacts related to traffic and agriculture. Specifically, the commenter states that because of the significant and unavoidable impacts in the Draft EIR, the 2040 General Plan would not protect the Town's safety, would not provide improvements to street infrastructure, and would not preserve agriculture and open space.

The 2040 General Plan contains an updated Town Vision and guiding principles for the Town through 2040. The 2040 General Plan Vision includes providing a safe and walkable environment for residents and visitors; demonstrating leadership and innovation in sustainable practices, development and public infrastructure; and valuing mobility and accessibility via walking, biking, and high quality public transit. The 2040 General Plan is intended to accommodate growth and development through a smart growth model that favors a mix of land uses and encourages active living through the development of mixed-use and walkable neighborhoods. As stated throughout the Draft EIR, the Town contains several policies that promote safety, active transportation, and agricultural conservation. Please see Responses 1.3 and 7.1 which contain a description of relevant goals and policies to reduce traffic and safety impacts. Goals and policies promoting agriculture in the Town are stated on pages 72 through 73 of the Draft EIR. These policies, specifically Policy ER-2.4, support agricultural and open space preservation in the Town. Please see Responses 2.2, 14.1, and 14.2 in relation to significant and unavoidable agricultural impacts. Therefore, although growth and development envisioned by the 2040 General Plan would have significant and unavoidable impacts it is consistent with the Town's goals and vision.

Response 14.6

The commenter states that because something is included in the 2040 General Plan does not mean that it cannot be changed or acted upon as written. The commenter recommends that the Town Council and Commission weigh the result of the Draft EIR with the Town's strategic initiatives. Finally, the commenter states that they appreciate the verbiage that was removed regarding the road on the eastern edge of the Town near Jensen Lane will be added back into the Final EIR.

The commenter is correct that the 2040 General Plan can be amended to better reflect the changing Town or changing regulations as necessary. The Town Council and Commission will consider the final documents and vote to adopt the 2040 General Plan and Final EIR in the beginning of 2018. The extension of Jensen Lane south is included in the 2040 General Plan on Figure M-1 on page 264 and is therefore analyzed in the Draft EIR and shown on Figure 21 on page 312. The original Policy LU-15.3 language for Jensen Lane has been added back into the 2040 General Plan on page 2-47. This addition in the Final EIR does not result in any changes to the impact analysis in the Draft EIR because all mitigation measures in the Final EIR would apply to the roadway extension to ensure that impacts from implementation of Policy LU-15.3 would be less than significant.

Kari Zajac

Subject: RE: TWGPU: Betsy Mallace Comments FW: Feedback on EIR 2040 General Plan

Letter 15

From: betsy mallace [mailto:betsymallace@yahoo.com]
Sent: Tuesday, December 5, 2017 7:21 PM
To: Sheila Wolski <swolski@Townofwindsor.com>
Subject: Feedback on EIR 2040 General Plan

Hello Town council, planning commission and Shelia Wolski with the town of Windsor,

Below are my questions regarding the EIR (impacts) of the new 2040 General Plan. I look forward to answers to the below questions.

Impact of AG-1- How much land (acres) is currently actively agricultural land within the town of Windsor? How much land (acres) is currently zoned agricultural land within the town of Windsor? 15.1

How much of Windsor's 46.3 acres of "Prime Farmland" could be converted to any other use in the 2040 plan? How much of Windsor's 99.9 acres of "Farmland of statewide importance" could be converted to any other use in the 2040 plan? How much of Windsor's 580 acres of "Farmland of local importance" could be converted to any other use in the 2040 plan? How much total agricultural land (acres) could be converted based on the new 2040 plan? No additional acreage should be allowed to be converted FROM agricultural land to any other use. 15.2

Impact of AG-2- How much land is currently zoned as buffer (between ag and "urban")? How much land will be zoned as buffer in the new 2040 plan? No buffer land should be reduced in the new 2040 plan, it is there for a reason to protect both the agriculture and the residential. 15.3

Impact AQ-1 – All current policy's preventing air pollution should be kept or strengthened in the 2040 plan. Why should the new plan be allowed to add or create additional air pollution? 15.4

Impact BIO-2- As birds are an important part of our local eco system, all protections of birds, or nesting must remain policy protected. There should be no way for these protections to be violated, over-ridden or non-compliant. Why should the new plan remove or lessen the protection of birds or nesting? 15.5

Impact POP-1 – Why would the general plan need to allow more than double the recommended ABAG new housing units in Windsor? This is violating the growth ordinance. This must be corrected to allow for (+/- 25%) of the ABAG planned units/growth not more. 15.6

Impact T-3- What other options, alternative, mitigations are available to avoid hazard creating queuing at 8 listed intersections? The 2040 plan should not be allowed to plan and accept traffic hazards; the plan must prepare and correct all known anticipated hazards. 15.7

I believe that the 3 listed project alternatives are all flawed, and a 4th alternative should be offered and accepted. 15.8

- Alternative 6.1- keep 2015 GP is outdated and not preferred
- Alternative 6.2- is not valid as the UGB was renewed and accepted.
- Alternative 6.3- this alternative is not acceptable as it is allowing current ag/farmland to be changed to “Agriculture” which is currently being pre-planned to be annexed and developed for dense housing. This is not preserving Ag/farmland. I do not understand how this current ag/farm land would be protected with this option. Please explain and clarify. Removing designations BMD and NCMU would not allow mixed use for in-fill located on both North and South ends of Old Redwood Highway, which is still needed. Therefore, these designations should not be removed.
- Alternative 6.? - Please advise a new alternative that includes the newly adapted UGB and does not change current ag/farmland and keeps designations BMD and NCMU.

15.8 Cont'd

Thank you for your consideration, and I look forward to your response and answers.

With best regards,
Betsy Mallace
Windsor, CA

Letter 15

COMMENTER: Betsy Mallace, Town resident

DATE: December 5, 2017

Response 15.1

The commenter asks how many acres of land within the Town are in active agricultural production and how many acres are zoned agricultural lands.

As a conservative approach, the Draft EIR assumes that all Farmland mapped by the California Department of Conservation is in active agricultural production. Therefore, in 2014 there were approximately 903 acres of agricultural lands (Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Unique Farmland, and Grazing Land) in the General Plan Area. As stated in Response 2.2, under the existing 2015 General Plan land uses designations, there are approximately 183 acres in the Town currently mapped as Farmland where agricultural operations are allowed. Under the 2040 General Plan there would be approximately 299 acres of Farmland that would have land use designations that permit agriculture operations.

The Town does not have an agricultural zoning or land use designation. However, limited agricultural operation is permitted on land designated as Rural Residential according to the 2040 General Plan land use designations and the implementing Zoning Code for Estate Residential identifies agriculture as an allowable use under the existing 2015 General Plan. As stated on page 368 of the Draft EIR an, "agricultural land use designation is contrary to the goals and objectives of the 2040 General Plan because it eliminates urban development from areas the Town has determined would contribute substantially to a pattern of compact future development, which reduces development occurring at the edges of the Town's UGB and thus reduces development pressure on agricultural lands outside the General Plan Area."

Response 15.2

The commenter asks how much of the Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and total farmland within the General Plan Area could be converted under buildout of the 2040 General Plan. The commenter states that no additional acreage should be allowed to be converted from agriculture.

Please see Response 2.2 for a full discussion of the conversion of existing agriculture uses to non-agriculture uses. The 2040 General Plan would permit agriculture on approximately 299 acres of mapped Farmland, while the 2015 General Plan would permit agriculture on approximately 183 acres of mapped Farmland.

Response 15.3

In respect to Impact AG-2 the commenter asks how much land is currently zoned as agricultural buffer in the General Plan Area and how much will be zoned as agricultural buffer as part of the 2040 General Plan. The commenter states that buffered land should not be reduced as part of the 2040 General Plan.

The Town of Windsor does not have a zoning or land use designation for agricultural buffers, nor does the does the 2040 General Pan include a designation for agricultural buffers. Please see Response 15.1. The Town does not have an agricultural zoning or land use designation. However, the Rural Residential and Estate Residential land use designations permit agriculture as part of the Town's Zoning Code and the General Plan promotes urban development in areas that the Town has determined would contribute substantially to a pattern of compact future development, therefore preserving agriculture in the region.

Response 15.4

The commenter states that all current policies in the 1996 General Plan relating to air quality should be kept or strengthened and asks why the 2040 General Plan should be allowed to create additional air pollution.

The 2040 General Plan as well as the added mitigation measures in the Draft EIR, retain existing air quality policies in the 2015 General Plan where relevant, and have added or strengthened the policies consistent with existing regulations. As stated in Section 4.3, *Air Quality*, of the Draft EIR, impacts related to air quality are either less than significant as a result of policies contained in the 2040 General Plan or less than significant with mitigation, which requires compliance with the Bay Area Air Quality Management District construction emission reduction measures. Regarding the difference between air quality between the 2040 General Plan and the 2015 General Plan, as stated in Section 6, *Project Alternatives*, Alternative 1 involves continued implementation of the 2015 General Plan. Page 353 of the Draft EIR discusses that while the 2040 General Plan focuses on alternative transportation and infill development, Alternative 1 would continue the currently planned development pattern throughout the Town with more urban development occurring at the edges of the Town's UGB than the 2040 General Plan. As a result, projected vehicle miles traveled (VMT) at buildout under Alternative 1 would increase compared to anticipated VMT under the 2040 General Plan. Therefore, the 2015 General Plan (Alternative 1) would result in higher associated air contaminant emissions as compared to the 2040 General Plan. Because the majority of air quality emissions are from mobile sources, overall air quality impacts would be greater under the 2015 General Plan than under the 2040 General Plan. Thus the 2040 General Plan would result in less air quality impacts than the 2015 General Plan and air quality policies in the 2040 General Plan are strengthened as compared to the existing 2015 General Plan.

Response 15.5

In respect to Impact BIO-2 the commenter states that birds and their protection are important and the nesting policy, Mitigation Measure BIO-1, should remain in the Draft EIR and 2040 General Plan. The commenter states that the 2040 General Plan should not remove or lessen the protection of special status bird species and their nests.

Mitigation Measure BIO-1 has not been removed from the 2040 General Plan or Draft EIR. Please see Response 6.2.

Response 15.6

In respect to Impact POP-1 the commenter asks why the 2040 General Plan would allow for more than double the recommended number of housing units as projected by ABAG. The commenter

states that the number of housing units violates the Town's growth ordinance and that the 2040 General Plan should allow for +/- 25 percent of the planned growth from ABAG.

As shown in Table 32 on page 267 of the Draft EIR, buildout of the 2040 General Plan would result in an additional 2,744 residential units as compared to ABAG 2040 projections, an increase of approximately 25 percent. Section 4.12, *Population and Housing*, on page 267 of the Draft EIR has been revised to add clarification regarding the 2040 General Plan's consistency with the Town's Growth Control Ordinance:

> Projected buildout under the 2040 General Plan would result in an annual average growth rate of 1.5 percent, which is consistent with the targeted growth rate in the Town's Growth Control Ordinance. Therefore, ~~Furthermore,~~ development in the Town facilitated by the 2040 General Plan would be ~~required to be~~ in compliance with the Town's Growth Control Ordinance. The purpose of the ordinance is "to accommodate growth anticipated under the General Plan, and to manage new development so that it occurs concurrently with necessary public services, facilities, and infrastructure." The Town's Growth Control Ordinance limits residential dwelling unit allocations as a means of managing growth; however, certain residential developments (i.e. single-family lots) are exempt from growth allocations. Additionally, the Ordinance establishes the requirements for a Merit Process for reserving allocations for new residential development and over the timeframe of the 2040 General Plan the Town's population is expected to grow at an average annual rate of 1.4 percent. ~~and considers the status and capacity of infrastructure, the fiscal conditions of the Town, the status of housing production, recommended development incentives, and entitled units in establishing the number of annual growth control allocations for the Town.~~ Therefore, development would be limited to the growth control allocations provided under the Growth Control Ordinance.

Additionally, page 268 of the Draft EIR states, "development in the Town facilitated by the 2040 General Plan would be required to be in compliance with the Town's Growth Control Ordinance. The purpose of the ordinance is to accommodate growth anticipated under the General Plan, and to manage new development so that it occurs concurrently with necessary public services, facilities, and infrastructure and considers the status and capacity of infrastructure, the fiscal conditions of the Town, the status of housing production, recommended development incentives, and entitled units in establishing the number of annual growth control allocations for the Town. Therefore, development would be limited to the growth control allocations provided under the Growth Control Ordinance." The 2040 General Plan would not violate the Town's Growth Ordinance and would accommodate growth concurrently with the necessary public services.

Response 15.7

In respect to Impact T-3 the commenter asks if there are other options, alternatives, or mitigation measures available to avoid queuing impacts. The commenter states that the 2040 General Plan should not have a significant and unavoidable queuing impact and should correct all known anticipated traffic hazards, particularly queuing.

Please see Response 14.1.

Response 15.8

The commenter states that the three Alternatives discussed in the 2040 General Plan are flawed and requests that a fourth alternative be added to the EIR that includes a newly adapted UGB and does not change current agricultural and farmland, while keeping the Boulevard Mixed Development and Neighborhood Commercial Mixed Development land use designations. The commenter states that Alternative 2 is invalid because the UGB has already been renewed and accepted and Alternative 3 is invalid because it allows current agricultural land to be changed to an Agricultural land use designation which is currently being pre-planned to be annexed and developed for dense housing. The commenter states that it should be clarified how agriculture would be preserved under Alternative 3 and that the mixed-use infill development designations should be kept because they are needed in the Town.

As stated in Section 15126.6 of the *State CEQA Guidelines,* the purpose of the alternatives analysis in Section 6.0 of the Draft EIR is intended to assess alternatives to the proposed project that could feasibly achieve similar objectives and reduce impacts compared to the proposed 2040 General Plan. The three alternatives provided in Section 6 of the Draft EIR were analyzed because they reduce several of the impacts resulting from full growth and buildout of the 2040 General Plan.

At the time of the public review period for the Draft EIR (started October 20, 2017) the UBG expansion ballot had not been passed. Alternative 2 was included in the Draft EIR in the event that the ballot measure did not pass.

As stated on page 362 of the Draft EIR, Alternative 3 includes a new Agricultural land use designation for the General Plan and is intended to preserve agriculture within the General Plan Area. During the project review stage for future individual projects, the pre-planned development for urban uses on existing agriculture lands would undergo environmental analysis as part of the application review process, which includes analyzing impacts related to conversion of agriculture. Overall, an Agricultural land use designation as suggested by Alternative 3 would conserve agriculture Townwide as those lands would not be designated for non-agriculture uses, but rather would only be allowed for agriculture use.

As stated on page 363 of the Draft EIR, removal of mixed-use designations under Alternative 3, except in the downtown area, would "reduce the overall net growth in population and employment in Windsor through the year 2040 by approximately 50 percent compared to the proposed 2040 General Plan." The reduction in overall growth, as a result of removal of the mixed-use land use designations would reduce congestion and queuing impacts at intersections to avoid the significant and unavoidable impact to traffic hazards (Impact T-4).

The fourth Alternative suggested by the commenter is similar in concept to the 2040 General Plan, which includes the UGB expansion area and the mixed-use designations. Thus the alternative proposed by the commenter would result in the same environmental impacts as the 2040 General Plan (proposed project) that has already been analyzed in the Draft EIR. The comparison of environmental impacts from the 2040 General Plan to the three alternatives is shown on Table 45 on page 368 of the Draft EIR.

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

RECEIVED

DEC 12 2017

TOWN OF WINDSOR

December 11, 2017

Sheila Wolski
Town of Windsor
PO Box 100
Windsor, CA 95492

Letter 16

Subject: Town of Windsor General Plan Update
SCH#: 2016112065

Dear Sheila Wolski:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 8, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

16.1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2016112065
Project Title Town of Windsor General Plan Update
Lead Agency Windsor, City of

Type EIR Draft EIR

Description Note: Review Per Lead

The 2040 General Plan is a comprehensive update of the Town's 1996 general plan, and establishes the community's vision for future development of the town over the next 22 years. As part of the general plan process, the 2040 general plan has been reorganized and reformatted, with updated goals and policies that reflect the community's vision of Windsor. The Town's general plan land use map also been updated to reflect the community's vision and three themes that thread through the 2040 general plan: growth management, sustainability and resiliency, and community health and well-being. Growth within the town limits is supported by the 2040 general plan with consideration of the ability to provide public services, fiscal impacts, and infrastructure capacity including water and wastewater capacity and transportation. Infill development would be prioritized to create more efficient and cost effective infrastructure, maximizing underutilized parcels in the town.
Development under the 2040 general plan would establish a more defined community edge providing a sense of transition between farmland on the town's edge and development within the town. The 2040 general plan includes the following seven updated elements: land use and community design, economic development, transportation and mobility, public facilities and services, environmental resources, public health and safety, and housing.

Lead Agency Contact

Name Sheila Wolski
Agency Town of Windsor
Phone (707) 838-5337 **Fax**
email
Address PO Box 100
City Windsor **State** CA **Zip** 95492

Project Location

County Sonoma
City Windsor
Region
Lat / Long
Cross Streets multiple as the planning area is townwide
Parcel No. multiple
Township **Range** **Section** **Base**

Proximity to:

Highways 101
Airports Charles M Schulz
Railways Northwest Pacific
Waterways multiple
Schools multiple
Land Use multiple, as this project is update of GP including LUE and associated designations

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

Note: Blanks in data fields result from insufficient information provided by lead agency.

Document Details Report
State Clearinghouse Data Base

Reviewing Agencies	Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 3; Cal Fire; Department of Parks and Recreation; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 4; Office of Emergency Services, California; Department of Housing and Community Development; State Water Resources Control Board, Division of Drinking Water; Regional Water Quality Control Board, Region 1; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received	10/19/2017	***Start of Review***	10/20/2017	***End of Review***	12/08/2017

Note: Blanks in data fields result from insufficient information provided by lead agency.

Vehicle Trip Reduction

In Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, this project falls under **Place Type 5 Rural and Agricultural Lands – Rural Towns**, which includes settlement patterns with widely-spaced towns separated by farms, vineyards, orchard, or grazing lands, which can significantly affect land uses, character and mobility needs. This place type has a mix of housing, services and public institutions in compact form to serve surrounding rural areas. Given this Place Type and intensification of use, which typically leads to high levels of VMT and corresponding low levels of active transportation, we encourage the implementation of robust Transportation Demand Management (TDM) programs in the Town's Circulation Element. Transportation Demand Management shall apply to new development and includes aggressive trip reduction targets with Lead Agency monitoring and enforcement, the Lead Agency should apply the following TDM elements when reviewing projects to promote smart mobility, reduce regional VMT and traffic impacts to the STN:

- Project design to encourage walking, bicycling, and convenient transit access;
- TDM coordinator;
- Ten percent vehicle parking reduction;
- Transit and trip planning resources such as a commute information kiosk;
- Carpool and vanpool ride-matching support;
- Electrical vehicle (EV) charging stations and designated parking spaces for EVs and clean fuel vehicles;
- Carpooling incentives and dedicated parking spaces for carpooling employees;
- Secured bicycle storage facilities;
- Bicycles for employees and residents to access nearby destinations;
- Showers, changing rooms, and clothing lockers;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources and bicycle parking incentives; and
- Decrease headway times and improve way-finding on Sonoma County Transit bus routes and the upcoming Sonoma-Marin Area Rail Transit (SMART) station to provide a better connection within the Town, nearby transit stations and regional destinations.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If a given project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on US 101 and other State facilities. These smart growth approaches are consistent with the MTC's RTP/SCS goals and would meet Caltrans Strategic Management Plan sustainability goals.

For additional TDM options, please refer to Chapter 8 of Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference*,

regarding TDM at the local planning level. The reference is available online at: http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf.
For information about parking ratios, please see MTC's report, Reforming Parking Policies to Support Smart Growth, or visit the MTC parking webpage: http://www.mtc.ca.gov/planning/smart_growth/parking.

Multimodal Planning
A Priority Development Area (PDA) is located within the Town of Windsor. PDA's are identified by the Association of Bay Area Governments (ABAG) as areas for investment, new homes, and job growth. To support PDA goals, future project(s) should be conditioned to provide connections to existing bike lanes and multi-use trails to facilitate walking and biking to respective residential, commercial, and recreational areas. By providing these connections and configuring streets for alternative transportation modes, the Town will reduce VMT and create multi-modal links to increase ridership for the Sonoma County Transit bus routes and the future Town of Windsor Sonoma-Marin Area Rail Transit (SMART) Station. The Town of Windsor should work with Sonoma County Transit Agency and other entities to provide bus services from the future SMART station at the Sonoma County Airport to downtown Windsor.

Traffic Impact Fees
Based on project-generated travel demand, please estimate the costs of public transportation improvements necessitated by the proposed Plan; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT. Please provide traffic impact fee matrix and schedule.

Lead Agency
As the Lead Agency, the Town of Windsor is responsible for all mitigation measures, including any needed improvements to the STN or reduction in VMT in association with the Plan. Any fair share contribution, financing, scheduling, implementation responsibilities and Lead Agency monitoring associated with the Plan should be fully discussed for all proposed mitigation measures.

Encroachment Permit
Applicants are required to apply for and obtain an encroachment permit for any work within Caltrans right-of-way (ROW) prior to construction. As part of the encroachment permit process, the applicant must provide the appropriate California Environmental Quality Act approval, where applicable, for potential environmental impacts within the ROW. The applicant is responsible for quantifying the environmental impacts of the improvements within Caltrans ROW (project-level analysis) and completing appropriate avoidance, minimization and mitigation measures.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

To apply for an encroachment permit, please complete an encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW, and submit to the following address: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website link below for more information: http://www.dot.ca.gov/hq/traffops/developserv/permits.

Should you have any questions regarding this letter, please contact Stephen Conteh at 510-286-5534 or stephen.conteh@dot.ca.gov.

Sincerely,

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Letter 16

COMMENTER: Scott Morgan, State Clearinghouse, Director

DATE: December 11, 2017

Response 16.1

The commenter notes that the Draft EIR for the proposed project was submitted to selected State agencies for their review, that one state agency, Caltrans, submitted comments on the Draft EIR, and that the Town has complied with the State Clearinghouse review requirements for draft environmental documents under the California Environmental Quality Act. Please see Responses to Letter 1 from Caltrans.

Special Joint Town Council and Planning Commission Meeting

The Town of Windsor Town Council and Planning Commission held a special joint public hearing on November 28, 2017 at which comments on the Draft EIR were received. In addition to the councilmen and commissioners, four members of the public offered verbal comments on the Draft EIR. The commenters are listed below followed by a summary of the comments and responses thereto.

No. and Commenter		Page No.
17	Lois Fisher	471
18	Julian Cohn	471
19	Betsy Mallace	472
20	Robert Hall	473
21	Town Council and Planning Commission	473

Lois Fisher

17.1 The commenter stated that five lane segments should not be promoted in the Town. The commenter continued that five lanes make walking around Town difficult and are a backwards step for a progressive Town. See Responses 4.1 through 4.4.

17.2 The commenter stated that pedestrian level of service is being ignored by the Draft EIR. As shown in Section 4.13, *Transportation and Traffic*, (pages 317 to 319) of the Draft EIR, impacts related to pedestrian facilities would be less than significant. Policies included in the 2040 General Plan EIR address a balanced transportation network to support and encourage walking and bicycling. Policies listed in the Draft EIR related to pedestrian transportation include Policy M-1.3 for development of pedestrian, bicycle, and transit facilities, Policy M-2.5 to incorporate complete street infrastructure in the Town, and Policy M-3.1 for the Town to create a more connected transportation network by eliminating gaps in the pedestrian network. With implementation of these policies, the Draft EIR determined impacts to bicycle, pedestrian and other alternative modes of transportation would be less than significant.

Julian Cohn

18.1 The commenter restated that five lane roadways are not appropriate for the Town and if there is enough room for five lanes then there is enough room to add additional bicycle and pedestrian facilities instead. The commenter stated that if the Town constructs more bicycle and pedestrian facilities then they would take traffic off the road and five lanes would not be necessary. See Responses 4.1 to 4.4 and Response 5.1.

18.2 The commenter asked that if the Town is building in a way that prevents groundwater recharge, is there a way to measure the impacts of development on natural systems? The commenter stated that if Windsor is harming natural systems then the Town is not being sustainable and is causing continuous degradation of the environment. The commenter stated that sustainability should be addressed in the General Plan and the Town should be a model town with a positive impact on the environment.

As discussed in Section 4.9, *Hydrology and Water Quality*, all impacts related to hydrology, including impacts related to groundwater, would be less than significant because goals and policies included in the 2040 General Plan would reduce hydrological impacts. Impact HYD-2 on pages 207 through 209 of the Draft EIR includes a discussion of impacts on groundwater recharge. As noted in the Draft EIR, compliance with 2040 General Plan goals and policies would support regional solutions to water supply challenges (Policy LU-9.6) and would maximize infiltration and rainwater retention (Policies PHS-7.8, PHS-7.9, PHS-7.10, and PHS-7.11). Compliance with Sustainable Groundwater Management Act requirements, implementation of the Sonoma County Water Agency and Town of Windsor Urban Water Management Plans, and adherence to the General Plan 2040 goals and policies would maximize groundwater infiltration and increase water use efficiency within the Town associated with construction and operation of new developments to the maximum extent practicable.

Betsy Mallace

19.1 The commenter stated that the 2040 General Plan should be a blueprint for success and prevent future issues in the Town. The commenter stated their concern with the removal of agricultural land as part of the 2040 General Plan and asked if the Town is aware of the harm that could occur with lost agricultural land and if there are any mitigation measures available to preserve agricultural land. See Response 2.2 which discusses the potential conversion of agricultural lands in the General Plan Area.

19.2 The commenter asked if the 2040 General Plan is preparing Windsor for natural disasters including flood, fire, and geologic hazards. See Response 7.1 regarding fire hazards. Flood hazards are discussed in Section 4.9, *Hydrology and Water Quality,* of the Draft EIR and were determined to be less than significant. As stated on page 215 of the Draft EIR implementation of 2040 General Plan's "goals and policies would ensure that the Town carefully manages development within a floodplain (Policy PHS-3.2, PHS-3.3, PHS-3.4, PHS-3.5, and PHS-3.6) and that any development within a floodplain is properly constructed to withstand adverse effects related to flooding (Policies PHS-3.1 and PHS-3.5)." Additionally, geological hazard impacts were determined to be less than significant in Section 4.6, *Geology and Soils*, of the Draft EIR. As stated on page 149 of the Draft EIR, implementation of 2040 General Plan's "goals and policies would result in the avoidance of siting critical facilities or other structures within areas susceptible to fault rupture (Policies PFS-7.8, ER-1.3, PHS-1.2, PHS-2.1, PHS-2.3, and PHS-2.5), would require more detailed review of design and construction plans and incorporation of additional structural safety features as necessary for structures that would be located on steep slopes or in areas subject to seismic hazards such as extreme ground shaking or liquefaction (Policies ER-1.3, PHS-2.2, PHS-2.3, and PHS-2.7), would ensure that adequate emergency response is available during an earthquake (Policy PHS-2.6), and would educate the public on earthquake preparedness

(Policy PHS-2.8)." Additionally, the Final EIR includes discussion of the Town's Local Hazard Mitigation Plan (LHMP) on pages 38, 145, 175, 272 and 278 of the Draft EIR in relation the health and safety of the Town. As stated on page 38 of the Draft EIR, "The LHMP identifies mitigation measures to reduce the risks posed by potential hazards and to strengthen community resilience."

19.4 The commenter stated that traffic is a current issue in the Town that the 2040 General Plan and Draft EIR should provide better solutions and alternatives to reduce traffic. As stated in Section 4.13, *Transportation and Traffic*, of the Draft EIR all impacts related to traffic would be either less than significant or less than significant with mitigation, except for traffic queuing. In regards to queuing, see Response 15.7 and in regard to the Town's vision to provide a balanced transportation system, see Responses 1.1 through 1.5, and 4.1.

19.3 The commenter stated that it is important to keep the nesting bird mitigation measure in the Draft EIR. Mitigation Measure BIO-1 has not been removed from the EIR. See Response 6.2.

19.5 The commenter stated that it is important to keep the air quality mitigation measure in the Draft EIR. Mitigation Measure AQ-1 has been altered in the Final EIR from mitigation requiring a new policy in the 2040 General Plan to a mitigation measure requiring compliance with the Bay Area Air Quality Management District construction emission reduction measures. See Response 6.2.

Robert Hall

20.1 The commenter stated that the road on the eastern edge of the Town near Jensen Lane should be constructed. See Response 14.6.

20.2 The commenter stated that there was not enough time to respond to the Draft EIR. As stated on Section 15105(a) of the *State CEQA Guidelines* a 45 day review period is required for EIRs. The 2040 General Plan EIR had a 50 day public review period from October 20 to December 8, 2017.

20.3 The commenter stated that they would like the original policy language for Jensen Road added back into the 2040 General Plan. This language has been added into the 2040 General Plan. See Response 14.6.

Town Council and Planning Commissioners

The Town Councils' and Planning Commissioners' questions regarding the Draft EIR were addressed verbally during the hearing by City Staff and by the City's environmental consultant. Questions and comments included the following:

Mayor Fudge

21.1 Mayor Fudge stated that five lane roadways are difficult to cross and does not encourage more five lane roadways in the Town. Mayor Fudge stated that the Town needs a more

walkable environment and that the language provided from Lois Fisher regarding five lanes should be added to the 2040 General Plan and Final EIR. See Responses to 4.1 to 4.4.

Councilmember Foppoli

22.1 Councilmember Foppoli stated that transportation, modes of transportation, and traffic patterns in 20 years will be different than today as a result of autonomous vehicles. Councilmember Foppoli asked how the Draft EIR accounted for potential changes in traffic patterns.

The Draft EIR is a conservative document that when analyzing impacts may overstate traffic impacts by analyzing worst case traffic in the Town. However, 2040 General Plan Policy M-3.24 Impact of Driverless Vehicles on Streets states that the Town will consider the impacts of autonomous vehicle technology on signage, speed limits, signal timing, and roadway design standards as the autonomous vehicle technology evolves. Additionally, individual projects that require discretionary approval would require their own project specific traffic studies when projects are fully planned and require review. Individual traffic studies would analyze transportation and traffic patterns under existing conditions at that time. The traffic study would assess impacts based on the existing conditions of that time (which may or may not include autonomous vehicles) and would assess impacts and any necessary mitigation based on those conditions (which may include use of autonomous vehicles). It would be speculative at this time for this EIR to estimate the number or type of autonomous vehicles that could utilize Windsor roads. However, future analysis completed for projects that require discretionary review may at that time utilize the most reasonable assumptions available.

22.2 Councilmember Foppoli asked how the new proposed fire station in the north of Arata Lane area would affect impacts in the Draft EIR. If constructed in the near future, the construction and operation of the new potential fire station would decrease wildfire impacts which are discussed in the Public Services analysis of the Draft EIR because it would increase fire services and decrease emergency response times in the Town. Increased fire services would result in shorter emergency response times because the new fire station would service the north end of the Town, reducing the travel time from the other fire station. Improved fire safety would further reduce impacts as compared to existing conditions analyzed in the Draft EIR. Therefore, if the potential new fire station in the north of Arata Lane area is constructed, impacts would remain less than significant.

22.3 Councilmember Foppoli stated that there was a less than significant finding in regards to wildfire hazards, but the 2040 General Plan should go above and beyond. As stated on page 192 of the Draft EIR impacts related to wildland fires were determined to be less than significant because policies contained in the 2040 General Plan would reduce risks from wildland fire and ensure fire safety. Additionally, as shown in Figure 13 of the Draft EIR there are no high fire hazard zones located within the Town. See Response 11.3 discussing the addition of a new fire policy added to the 2040 General Plan. With this policy added, impacts related to wildland fires would remain less than significant.

22.4 Councilmember Foppoli stated that the Town should be fluid enough to adapt to changing traffic patterns, including parking and autonomous vehicles, and their environmental impacts. The Draft EIR presents a conservative traffic analysis assuming projected buildout of the 2040 General Plan and does not assume substantial autonomous vehicles as it would

be speculative to make that assumption at this time. Nevertheless, mitigation measures provided in Section 4.14, *Traffic and Transportation*, of the Draft EIR and policies included in the 2040 General Plan, see Responses 1.1 through 1.5, 4.1 and 22.1, would allow the Town to adapt to changes in traffic as a result of the 2040 General Plan.

Councilmember Okrepkie

23.1 Councilmember Okrepkie stated that the Town already has several five lane roads and that the fifth lane would be a turn lane not an additional lane down the middle of the road. This comment is noted. No response is necessary as this comment was addressing comments by the public regarding the concern for five lane roadways (see further discussion in Response 4.1).

23.2 Councilmember Okrepkie stated that Jensen Lane should be extended. See Response 14.6.

23.3 Councilmember Okrepkie stated that the Town needs to consider the potential impacts of fire on the community and that the 2040 General Plan should have adequate fire policies. The 2040 General Plan does in fact have several fire policies. See Responses 7.1 and 11.3.

23.4 Councilmember Okrepkie addressed a comment he received from a member of the public regarding concern for bicycle paths as it relates to continuous east-west bicycle access. Councilmember Okrepkie pointed out that this information is included in the Draft EIR on page 289 which discusses a robust bicycle system, a summary of the existing bicycle facilities, and summarizes the Windsor Bicycle and Pedestrian Master Plan. Councilmember Okrepkie is correct that the Draft EIR discusses existing bicycle facilities on page 289 of the Draft EIR and bicycle travel is analyzed under Impact T-5 on page 317. As noted in Response 5.1, the focus of the 2040 General Plan in terms of transportation is to address a balanced transportation network to support and encourage walking, bicycling and transit ridership while continuing to accommodate automobile travel. Highway 101, as noted on page 289 of the Draft EIR, bisects the community and is a significant barrier to continuous east-west bicycle access. Therefore, as noted on page 289, significant work still remains in order to ensure the Town's bikeways network continues to be developed to provide bicycle access to destinations throughout Windsor. The 2040 General Plan strives to enhance bicycle paths by implementation of policies and implementation measures that enhance multimodal transportation and complete streets in the Town (Policies M-1.1, M-1.3, M-2.5, M-2.7 and Implementation Programs M-4 and M-5) and promoting active transportation by addressing safety concerns (Policies M-2.3, M-3.12, M-4.1, M-4.2, M-4.4 and Implementation Programs M-10 and M-11).

Councilmember Millan

24.1 Councilmember Millan stated that he would like the extension of Jensen Lane included in the General Plan and EIR and asked about the process for adding the extension. The extension of Jensen Lane is included in the 2040 General Plan and is shown on Figure 21 on page 312 of the Draft EIR as a proposed new street. The policy language for Jensen Lane was added back into the 2040 General Plan. This addition does not change any impacts or analysis in the Draft EIR, but rather clarifies what was assumed in the Draft EIR. See Response 14.6.

24.2 Councilmember Millan stated that the EIR should incorporate walkability and bicycle transportation. The Draft EIR discusses pedestrian and bicycle travel under Impact T-5 on

page 317 and impacts were determined to be less than significant based on the numerous policies contained in the 2040 General Plan related to achieving a balanced transportation network. As noted in Response 5.1, the focus of the 2040 General Plan in terms of transportation is to address a balanced transportation network that will support and encourage walking, bicycling and transit ridership while continuing to accommodate automobile travel.

24.3 Councilmember Millan stated that Windsor should be a leader in water management and that the Town is sustainable in regards to water recycling and management. As discussed in Section 4.9, *Hydrology and Water Quality*, compliance with 2040 General Plan goals and policies would support regional solutions to water supply challenges (Policy LU-9.6), would ensure an adequate and sustainable water supply for the Town (Policies PFS-2.1, PFS-2.2, PFS-2.3, PFS-2.10, PFS-2.11, PFS-2.12, ER-3.5, PHS-7.6, and PHS-7.7), would promote the efficient use of water resources (Policies PFS-2.5, PFS-2.6, PFS-2.8, PFS-2.9), and would maximize infiltration and rainwater retention (Policies PHS-7.8, PHS-7.9, PHS-7.10, and PHS-7.11). Additionally, as stated in Section 4.15, *Utilities and Service Systems*, the 2040 General Plan is consistent with the recommendations of the 2015 Urban Water Management Plan and Policy PFS-1.5 (Sustainable Practices), would support conservation practices that reduce water use, and Policy PFS-1.7 (Priority Infrastructure) gives high priority to funding for the rehabilitation or replacement of critical infrastructure.

Councilmember Salmon

25.1 Councilmember Salmon asked if the construction of Jensen Road would affect growth and traffic in the EIR. The extension of Jensen Road south is contemplated in the 2040 General Plan document and was assumed in the Draft EIR. The policy language for the road extension was added back into the 2040 General Plan (see Response 14.6 and 24.1). This addition would not result in a change to the EIR analysis.

25.2 Councilmember Salmon stated that the agricultural section of the Draft EIR has significant and unavoidable impacts from conversion of agricultural land and that the mitigation measures that could be implemented would not make the impact less than significant. Councilmember Salmon asked if these mitigation measures were in the Draft EIR. The measures Councilmember Salmon referred to are in the Draft EIR. Section 4.2, *Agricultural Resources*, of the Draft EIR Impact AG-1 lists a number of measures that are intended to reduce impacts related to conversion of agriculture to non-agriculture uses. But, as noted in the Draft EIR, mitigation measures for conversion of agriculture would not be feasible moving forward because there are no measures available to prevent the conversion of agriculture. Please see Response 14.1. As discussed in Response 2.2, while the 2040 General Plan would potentially preserve more acres of Farmland for agriculture uses compared to the existing 2015 General Plan, because projected buildout through the year 2040 compared to existing conditions could result in conversion of existing agricultural uses to non-agricultural uses in the General Plan Area, impacts are significant.

25.3 Councilmember Salmon asked if agricultural impacts are significant and unavoidable who drafts the findings for the EIR. The findings are part of the EIR process and are drafted by Town staff and will be presented at the hearing for certification of the EIR.

25.4 Councilmember Salmon stated that the finding for mixed-use, including Boulevard Mixed-Use, in the EIR would result in less overall growth and asked if this is a mathematical

determination. As stated on page 363 of the Draft EIR, Alternative 3 involves the removal of the mixed-use land use designations, except in downtown. Removing the mixed-use designations from the 2040 General Plan would reduce population growth in a way that would reduce traffic, air quality, and greenhouse gas impacts. Under Alternative 3, by reducing density in the Town, other impact areas are similarly reduced compared to the growth anticipated by the 2040 General Plan.

25.5 Councilmember Salmon stated that mixed-use is a concept of smart growth, and therefore should reduce impacts. However, there were greater impacts in terms of traffic and infrastructure needs because the growth goes elsewhere. Councilmember Salmon asked if there is a way to see the reduction of impacts in a way other than population. Councilmember Salmon further asked what if the environmentally superior alternative is not the 2040 General Plan and how the 2040 General Plan would address an alternative.

The purpose Alternative 3 was to avoid the significant and unavoidable impacts to agriculture and traffic. Therefore, Alternative 3 focuses on reducing the agricultural and traffic impacts by creating an agricultural land use designation and reducing density, as discussed on pages 362 through 363 of the Draft EIR. Table 45 of the Draft EIR provides a comparison of each alternative in relation to the 2040 General Plan.

As stated in Section 15126.6 in the *State CEQA Guidelines,* the Draft EIR does not have to address all alternatives on a similar level as the 2040 General Plan. Additionally, the environmentally superior alternative does not necessarily mean that the alternative is superior to the 2040 General Plan, as shown on Table 45 of the Draft EIR.

25.6 Councilmember Salmon asked if the EIR addresses hydrological impacts associated with agriculture and what type of analysis the EIR has in terms of converting agriculture and the hydrological impacts from storm incidences with increased impervious surfaces. The Draft EIR does not provide a parcel by parcel analysis of the General Plan Area because it is a programmatic document. However, overall the 2040 General Plan would result in increased impervious surfaces as compared to existing conditions because the 2040 General Plan would involve denser development as discussed in Section 4.9, Hydrology and Water Quality, of the Draft EIR. See Response 18.2 which summarizes the impacts and policies related to hydrology and potential increase in impervious surfaces that may result as a result of the 2040 General Plan.

25.7 Councilmember Salmon asked if the Draft EIR addressed impacts from wildfires. See Responses 7.1 and 11.3.

25.8 Councilmember Salmon asked if pedestrian and bicycle improvements at intersections with significant and unavoidable impacts would affect performance of the intersections by moving people through the intersection. As discussed on pages 301 through 311 of the Draft EIR, intersection impacts would be less than significant with mitigation involving development of left- turn lanes. Therefore, pedestrian and bicycle improvements would not be necessary to reduce intersection impacts. The addition of bicycle and pedestrian improvements at intersections could further improve the level of service at study intersections; however intersection impacts would remain less than significant with mitigation.

25.9 Councilmember Salmon asked how changes are incorporated into the EIR. The Draft EIR that was out for public review is a draft document. Any additions or contractions resulting from comments received during the public review process would be analyzed in this section of

the Final EIR to determine any potential changes to the analysis. The Final EIR cannot result in any new or greater significant impacts or change any existing impacts without recirculation. As noted throughout this section, while some changes have occurred in the Final EIR (which are noted in strikeout and underline), none of the changes result in any new or greater significant impacts or changes to any of the existing impact levels.

25.10 Councilmember Salmon asked if "services" in the Draft EIR include streets and roads as well. Councilmember Salmon is correct; services also include streets and roads.

25.11 Councilmember Salmon stated that fire risk policy is important and that he is concerned with the environmentally superior alternative. Councilmember Salmon stated that he would like to see an alternative that shows agricultural land as converted and that agricultural land functions as a fire break for the Town. As shown in Table 45 on page 368 of the Draft EIR the environmentally superior alternative is not superior to the 2040 General Plan, which is the proposed project. The 2040 General Plan includes potential agriculture conversion, which is analyzed in the Draft EIR (please see further discussion in Response 2.2). . Regarding fire risk policy and agricultural land as a fire break please see Responses 7.1 and 15.8.

25.12 Councilmember Salmon stated that he would like to see mitigation measures that have to do with bicycle and pedestrian transportation to reduce traffic congestion because the Town would use these improvements. As discussed under Impact T-5 on page 317 of the Draft EIR the focus of the 2040 General Plan in terms of transportation is to address and balanced transportation network that supports bicycle and pedestrian transportation. Impacts related to bicycle and pedestrian transportation would be less than significant because implementation of policies and implementation measures in the 2040 General Plan would reduce impacts by enhancing multimodal transportation and complete streets in the Town (Policies M-1.1, M-1.3, M-2.5, M-2.7 and Implementation Programs M-4 and M-5) and promoting active transportation by addressing safety concerns (Policies M-2.3, M-3.12, M-4.1, M-4.2, M-4.4 and Implementation Programs M-10 and M-11). Thus no mitigation measures are necessary.

Commissioner Huberts

26.1 Commissioner Huberts stated that he is concerned about the future of the Town, but the 2040 General Plan would allow the Town to adapt to change. Comment is noted. As the comment did not question the analysis in or conclusions of the Draft EIR, no response is necessary.

26.2 Commissioner Huberts stated that he wants to see green products and other environmental measures implemented in the Town. The 2040 General Plan and mitigation measures included in the EIR ensure that the Town will consider environmental impacts and work to reduce those impacts during buildout of the 2040 General Plan.

Commissioner Albini

27.1 Commissioner Albini asked if the EIR can address impacts to air traffic noise, such as a policy or something to require more cooperation with the County and Federal Air Administration (FAA) to enforce the elevation of approaching planes and staying in the radius outside the Town limits. Commissioner Albini stated that there should be better communication between the Town, County, and FAA. As stated on page 248 of the Draft EIR in Section 4.11, *Noise*, "impacts related to aircraft noise were found to be less than significant." The 2040

General Plan was reviewed by the airport commission and the EIR analysis evaluates if any sensitive receptors that would be impacted are in close proximity to the airport. Impacts related to air traffic noise would be less than significant as no new noise sensitive uses are proposed to be located in the vicinity of an airport (as noted on page 249 of the Final EIR). CEQA does not require analysis of impacts on existing sensitive receptors that would be impacted by airport noise.

Commissioner Berlant

28.1 Commissioner Berlant stated that wildland fire is more than a fire mapping issue and asked if there were mitigation measures added to the EIR to require development in the Town to follow what communities learn or techniques following a fire. As discussed under Impact HAZ-6 on pages 190 to 192 of the Draft EIR, impacts from wildland fires were determined to be less than significant. Policies included in the 2040 General Plan would reduce risks from wildland fires by reducing fire risks in the Town with weed abatement and project proposal review in fire hazard areas. In addition, 2040 General Plan policies ensure that the Town is prepared for fires by coordinating fire efforts with Sonoma County and applying mitigation to projects unable to satisfy minimum fire flow requirements. In addition, a new policy has been added to the 2040 General Plan to ensure lessons learned from the Tubbs Fire are implemented into the General Plan in the future (please see Responses 7.1 and 11.3).

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9 Addenda/Errata

This section presents minor changes to the Final EIR since the publication of the Draft EIR and revisions that have been made to the Draft EIR as a result of comments received on the document. Staff-initiated changes include minor corrections and clarification to the text to correct typographical errors. None of the changes affect the analysis or conclusions of the Draft EIR as described for each change which is summarized and shown below.

Changes to the Final EIR and Environmental Analysis

Changes to the Final EIR

1.1 A minor revision to Mitigation Measure CR-1 as shown in Section 4.5, *Cultural Resources,* on page 133 of the Final EIR*,* based on a comment letter received during the Draft EIR public review process (see Letter 3 and Response 3.3 in Section 8.0, *Responses to Comments on the Draft EIR*). These changes include adding a Cultural Resources Study requirement for discretionary approval where there is substantial ground disturbance and tribal consultation if tribal resources are revealed in a Phase 1 Survey. These changes are shown below with edits displayed in ~~strikeout~~/underline. None of the changes shown below would result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.

CR-1 Cultural Resources Study Implementation Program

The following Implementation Program shall be added to the 2040 General Plan:

If the preliminary reconnaissance required under Policy ER-7.10 suggests that significant historic resources, cultural resources, or tribal cultural resources may exist or for any other project requiring discretionary approval where there will be substantial ground disturbance by the project, the applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in archaeology and/or an architectural historian meeting the SOI PQS standards in architectural history to complete a Phase 1 cultural resources inventory of the project site (NPS 1983). A Phase 1 cultural resources inventory should include a pedestrian survey of the project site and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC). The technical report documenting the Phase 1 cultural resources inventory shall include recommendations to avoid or reduce impacts to cultural resources.

1.2 A minor revision has been made to Section 4.11, *Noise*, on page 249 of the Final EIR, adding a clarification regarding new noise sensitive receptors in the General Plan Area. These changes are shown below with edits displayed in ~~strikeout~~/underline. None of the changes shown below would result in new significant impacts or a substantial increase in the severity of environmental

impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.

As described in Section 4.17, *Effects Found Not to Be Significant*, impacts related to aircraft noise were found to be less than significant and no new noise sensitive uses are proposed to be located in the vicinity of an airport. Impacts related to aircraft noise ~~and~~ are not discussed further in this section.

1.3 A minor revision has been made to Section 4.12, *Population and Housing*, on page 268 of the Final EIR, adding clarification regarding the2040 General Plan's consistency with the Town's Growth Control Ordinance and information regarding the Ordinance. These changes are shown below with edits displayed in ~~strikeout~~/underline. None of the changes shown below would result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.

Projected buildout under the 2040 General Plan would result in an annual average growth rate of 1.5 percent, which is consistent with the targeted growth rate in the Town's Growth Control Ordinance. Therefore, ~~Furthermore,~~ development in the Town facilitated by the 2040 General Plan would be ~~required to be~~ in compliance with the Town's Growth Control Ordinance. The purpose of the ordinance is "to accommodate growth anticipated under the General Plan, and to manage new development so that it occurs concurrently with necessary public services, facilities, and infrastructure." The Town's Growth Control Ordinance limits residential dwelling unit allocations as a means of managing growth; however, certain residential developments (i.e. single-family lots) are exempt from growth allocations. Additionally, the Ordinance establishes procedures for reserving allocations for new residential development and over the timeframe of the 2040 General Plan the Town's population is expected to grow at an average annual rate of 1.5 percent. ~~and considers the status and capacity of infrastructure, the fiscal conditions of the Town, the status of housing production, recommended development incentives, and entitled units in establishing the number of annual growth control allocations for the Town.~~ Therefore, development would be limited to the growth control allocations provided under the Growth Control Ordinance.

1.4 A minor revision has been made to Section 4.14, *Transportation and Traffic*, on page 283 of the Final EIR, adding clarification regarding the traffic analysis. These changes are shown below with edits displaced in ~~strikeout~~/underline. None of the changes shown below would result in new significant impacts or a substantial increase in the severity of environmental impacts, and therefore, would not require additional mitigation measures or alternatives to the proposed project.

This section evaluates the potential impacts on the local and regional circulation system that would result from implementation of the 2040 General Plan. This includes an analysis of the potential for ~~the proposed General Plan~~ growth that occurs outside of the Urban Growth Boundary to increase local and regional traffic volumes, increase hazards due to a design feature, interfere with emergency access, or conflict with applicable alternative transportation programs.

1.5 A minor revision has been made to Section 4.16, *Tribal Cultural Resources*, on page 340 of the Final EIR, adding clarification regarding the significance finding for tribal cultural resources impacts. These changes are shown below with edits displaced in ~~strikeout~~/underline. None of the changes shown below would result in new significant impacts or a substantial increase in

the severity of environmental impacts, and therefore, would not require additional mitigation measures or alternatives to the proposed project.

Mitigation Measures

No mitigation measures are required because implementation of Policies ER-7.3, ER-7.4, and ER-7.6 from the 2040 General Plan would reduce impacts to a less than significant level by requiring protection of Native American Cultural Resources, proper treatment of Native American human remains, and compliance with state regulations. However the following mitigation measures from Section 4.5, Cultural Resources, are recommended to further reduce impacts to tribal cultural resources.

CR-1 Cultural Resources Study Implementation Program

The following Implementation Program shall be added to the 2040 General Plan:

If the preliminary reconnaissance required under Policy ER-7.10 suggests that significant historic resources, cultural resources, or tribal cultural resources may exist or for any other project requiring discretionary approval where there will be substantial ground disturbance by the project, the applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in archaeology and/or an architectural historian meeting the SOI PQS standards in architectural history to complete a Phase 1 cultural resources inventory of the project site (NPS 1983). A Phase 1 cultural resources inventory should include a pedestrian survey of the project site and sufficient background archival research and field sampling to determine whether subsurface prehistoric or historic remains may be present. Archival research should include a records search conducted at the Northwest Information Center (NWIC) and a Sacred Lands File (SLF) search conducted with the Native American Heritage Commission (NAHC). The technical report documenting the Phase 1 cultural resources inventory shall include recommendations to avoid or reduce impacts to cultural resources.

CR-2 Tribal Cultural Resource Consultation

Mitigation Measure CR-1 shall apply to all discretionary projects. Where potential tribal cultural resources are encountered or revealed through the Phase 1 Survey, the Town will consult with applicable tribe(s) to determine appropriate measures for addressing the resources.

CR-4 Human Remains

If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be list in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines that remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

Significance After Mitigation

Impacts to tribal cultural resources would be *less than significant with* adherence to goals and policies contained in the General Plan Update. However, cultural resources mitigation measures from Section 4.5, *Cultural Resources*, are recommended to further reduce impacts.

1.6 A minor revision has been made to Section 4.3, *Air Quality*, on pages 84 and 86 of the Final EIR, changing air quality mitigation from a 2040 General Plan policy to a mitigation measure. These changes are shown below with edits displayed in ~~strikeout~~/underline. None of the changes shown below would result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.

IMPACT AQ-1 BUILDOUT OF THE 2040 GENERAL PLAN WOULD RESULT IN THE TEMPORARY GENERATION OF AIR POLLUTANTS DURING CONSTRUCTION, WHICH WOULD AFFECT LOCAL AIR QUALITY. ~~MODIFICATION~~ IMPLEMENTATION OF MITIGATION ~~2040 GENERAL PLAN POLICY ER-4.3~~ TO INCLUDE THE BAAQMD BASIC CONSTRUCTION MITIGATION MEASURES WOULD REQUIRE FUTURE PROJECTS WITHIN THE GENERAL PLAN AREA TO IMPLEMENT MEASURES TO REDUCE CONSTRUCTION EMISSIONS. IMPACTS WOULD BE SIGNIFICANT BUT MITIGABLE.

Mitigation Measures

Temporary construction impacts associated with development envisioned by the General Plan would be reduced through implementation of Mitigation Measure AQ-1.

AQ-1 Construction Emissions Measures

~~Environmental Resources Policy ER-4.3 shall be updated to read:~~ The Town shall require that development projects incorporate the Bay Area Air Quality Management District (BAAQMD) Basic Construction Mitigation Measures to reduce construction emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$). The Town shall require the following to be adhered to during project construction to reduce air quality impacts.

During construction activities:

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, with priority given to the use of recycled water for this activity when feasible.
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 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 visible emissions evaluator.

8. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

The Town shall also require that development projects incorporate feasible measures that reduce operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM_{10} and $PM_{2.5}$).

1.7 A minor revision has been made to Section 4.11, *Noise*, on pages 252 through 254 of the Final EIR, changing noise mitigation from a 2040 General Plan policy to a mitigation measure. These changes are shown below with edits displayed in ~~strikeout~~/underline. None of the changes shown below would result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.

Mitigation Measures

Mitigation Measure N-1 would be required to reduce construction noise during working construction hours to the extent feasible.

N-1 Construction Noise Control Measures

~~The following policy shall be added to the Public Health and Safety Element under Goal PHS-8, Noise:~~

~~**Policy PHS-8.18** ***Construction Noise Control Measures.***~~ The following noise control measures shall be included as standard conditions of approval for projects involving construction:

1 Properly muffle and maintain all construction equipment powered by internal combustion engines.

2 Prohibit unnecessary idling of combustion engines.

3 Locate all stationary noise-generating construction equipment such as air compressors as far as practical from existing nearby residences and other noise-sensitive land uses. Such equipment shall also be acoustically shielded.

4 Select quiet construction equipment, particularly air compressors, whenever possible. Fit motorized equipment with proper mufflers in good working order.

5 Residences adjacent to project sites shall be notified in advance by writing of the proposed construction schedule before construction activities commence.

6 The project applicant shall designate a "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint (e.g., starting too early,

bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator shall be posted at the construction site.

Mitigation Measures

Mitigation Measure N-2 would be required to reduce construction-related vibration to the extent feasible.

N-2 Construction Vibration Control Measures

~~The following policy shall be added to the Public Health and Safety Element under Goal PHS-8, Noise:~~

~~**Policy PHS-8.19 *Construction Vibration Control Measures*.**~~ The following measures to minimize exposure to construction vibration shall be included as standard conditions of approval for applicable projects involving construction:

1 Avoid the use of vibratory rollers within 50 feet of fragile buildings, which are buildings that are susceptible to damage from vibration.

2 Schedule construction activities with the highest potential to produce vibration to hours with the least potential to affect nearby institutional, educational, and office uses that the Federal Transit Administration identifies as sensitive to daytime vibration (FTA 2006).

3 Notify neighbors of scheduled construction activities that would generate vibration.

1.8 A minor revision has been made to Section 4.10, *Land Use and Planning*, on page 238 of the Final EIR, to match the 2040 General Plan policy language change. These changes are shown below with edits displayed in ~~strikeout~~/underline. None of the changes shown below would result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.

Policy LU-9.4 *Airport Land Use Commission Referrals*. The Town shall ensure that proposals within Airport Land Use Commission (ALUC) referral areas consider land use policies in the ALUC Policy Plan and will review and condition development proposals, as appropriate, to ~~ensure~~ strive for compliance with ALUC regulations.

1.9 A minor revision has been made to Section 4.15, *Utilities and Service Systems*, on page 332 of the Final EIR, to match the 2040 General Plan policy language change. These changes are shown below with edits displayed in ~~strikeout~~/underline. None of the changes shown below would result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.

Policy PFS-3.11: *Cost of New Infrastructure*. The Town shall require that costs of improvements to the wastewater and water reclamation system that are necessary for new development are financed by the property owner or developer, based on determination of nexus of impact created.

1.10 A minor revision has been made to Section 4.15, *Utilities and Service Systems*, on page 330 of the Final EIR, to match the 2040 General Plan policy language change. These changes are shown below with edits displayed in ~~strikeout~~/underline. None of the changes

shown below would result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.

Policy PFS-2.4: *Cost of New Infrastructure*. The Town shall require that costs of improvements to the water system that are necessary for new developments are financed by the property owner and/or developer, based on determination of nexus of impacts created.

1.11 A minor revision has been made to Section 4.4, *Biological Resources*, on pages 114 through 115 of the Final EIR, changing nesting bird mitigation from a 2040 General Plan policy to a mitigation measure. These changes are shown below with edits displayed in ~~strikeout~~/underline. None of the changes shown below would result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.

Mitigation Measures

The following mitigation measure is required to reduce impacts from development on nesting birds.

BIO-1 Nesting Bird Protection ~~Policy~~

~~The following policy shall be added to the 2040 General Plan Environmental Resources Element as Policy ER-6.12:~~

The Town shall require project applicants to retain the services of a qualified biologist(s) to conduct a pre-construction nesting bird survey during the nesting season (February 1 through August 31) prior to all new development that may remove any trees or vegetation that may provide suitable nesting habitat for migratory birds or other special-status bird species. If nests are found the qualified biologist(s) shall identify appropriate avoidance measures.

Significance After Mitigation

Impacts would be less than significant with implementation of Mitigation Measure BIO-1 to ~~add a policy to the General Plan to~~ conduct pre-construction nesting bird surveys and implement avoidance measures if appropriate

Changes to 2040 General Plan Policies

Changes to 2040 General Plan policies since the Draft EIR was released and their effect on the Final EIR are shown in Table 48 below.

Table 48 2040 General Plan Policy Changes

2040 General Plan Policy	Effect on Final EIR
Policy ER-2.2. Agricultural Buffers. Proposed new development that would be adjacent to existing agricultural properties should include buffers onsite to protect the continued viability of the neighboring agriculture and to minimize adverse effects of agricultural operations. If the existing agricultural property lies outside the Urban Growth Boundary, then the onsite buffer should be permanent and composed of predominantly native and	This policy has been modified on page 2-103 of the 2040 General Plan to add a maximum buffer width. This updated policy would not alter the impact analysis contained in the Draft EIR, but would clarify the existing policy language. The revised policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed

low water-using species, or other appropriate perimeter screening should be required. The Town should allow and encourage the productive use of buffers for appropriate uses, where legally permissible, such as bike trails, rather than requiring buffers to be idle open space. The size of the buffer will be determined by parcel specific review for all new development adjacent to agricultural property, with a width not to exceed 200 feet. If however, the existing agricultural property lies inside the Urban Growth Boundary and is anticipated to be converted to another non-agricultural use designation according to the General Plan, then the buffer would be temporary. When the interim agricultural area is converted to the nonagricultural use designation, the intermediate buffer area may convert to its underlying land use designation.	project.
Policy ER-7.4. Treatment of Remains. ~~Consistent with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98, if human remains are encountered, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. The remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains.~~ If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the County Coroner determines that remains to be Native American, the Native American Heritage Commission must be contacted within 24 hours. The Native American Heritage Commission must then immediately identify the "most likely descendant(s)" of receiving notification of the discovery. The most likely descendant(s) shall then make recommendations within 48 hours, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.	The policy has been modified to include similar language as the original policy. Changes would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy M-3.25 Full build-out of five-lane boulevards will only occur when necessary to maintain acceptable levels of service along the Town's transportation network. In their interim condition prior to full build-out, the full width necessary to accommodate five-lane boulevards shall be dedicated to the Town; however, the fewest number of lanes necessary to maintain acceptable levels of service will be required and any excess right-of-way may be improved with pedestrian facilities, street parking, bicycle lanes, and parklets.	This policy has been added to page 2-72 of the 2040 General Plan to clarify the development of potential five-lane roadways in the town. This added policy would not alter the impact analysis contained in the Draft EIR but rather clarifies the development of potential five lane roadways in the General Plan Area over time. The additional policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed

	project.
Policy PFS-2.15. Water Service Outside UGB. The Town, through the Windsor Water District, shall ensure that water service to areas within and outside of the Town's Urban Growth Boundary are consistent with the Town's Urban Water Management Plan and predicated on implementation of best management practices including, but not limited to, use of recycled water where available, water efficient landscaping, and other water efficiency measures, as feasible and appropriate, to ensure maximum water conservation.	This policy has been added to page 2-87 of the 2040 General Plan to ensure Town coordination on Windsor Water District water services with service areas outside of the Town's Urban Growth Boundary and in the Airport Industrial Area. This added policy would not alter the impact analysis contained in the Draft EIR, but rather would further reduce less than significant impacts related to water supply discussed under Impact ULT-1 in Section 4.15, *Utilities and Service Systems,* of the Final EIR. The additional policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy PHS-4.8. Public Warning System. Explore implementation of a public siren and broadcasting system, to be used in combination with reverse calling and other methods as a means of alerting residents of imminent threats.	This policy has been added to page 2-131 of the 2040 General Plan to ensure emergency evacuation. This added policy would not alter the impact analysis contained in the Draft EIR, but rather further reduce less than significant impacts related to emergency evacuation and wildfires contained in Impacts HAZ-5 and HAZ-6 in Section 4.8, *Hazards and Hazardous Materials,* of the Final EIR. The additional policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy PHS-4.9. Priority Undergrounding. Prioritize undergrounding of utilities along emergency access and evacuation routes to make them more reliable and to minimize hazards from fallen power lines.	This policy has been added to page 2-131 of the 2040 General Plan to ensure unimpeded access for first responders and evacuation routes during emergencies. This added policy would not alter the impact analysis contained in the Draft EIR, but rather further reduce less than significant impacts related to emergency access discussed under Impact T-4 in Section 4.14, *Transportation and Traffic,* and Impacts HAZ-5 and HAZ-6 in Section 4.8, *Hazards and Hazardous Material,* of the Final EIR *s*. The additional policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy PFS-8.1. Undergrounding. The Town shall require that utility distribution and transmission lines for all new development be placed underground except for high voltage power lines and except in those specific areas where undergrounding of existing overhead lines for the entire area is deemed by Council to be impractical. <u>See also Policy PHS-4.9</u> (Source: Existing General Plan, Policy E.4.15 modified).	This policy has been modified on page 2-93 of the 2040 General Plan to reference the new Policy PHS-4.9. This updated policy would not alter the impact analysis contained in the Draft EIR but rather refers to a new policy (see above). The revised policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy PHS-6.3. Sonoma County Airport Land Use Compatibility Plan Consistency. The Town shall <u>strive for consistency between</u> ~~ensure~~ its policies, plans, and ordinances ~~and are consistent with~~ <u>and</u> the Airport Land Use Compatibility Plan. (Source: New Policy, Town Staff, and Consultants)	This policy has been modified on page 2-134 of the 2040 General Plan to preserve the Town's discretion as allowed under Public Resources Code Section 21676. This updated policy would not alter the impact analysis contained in the Draft EIR but rather clarifies the policy language. The revised policy would not result in new significant impacts or

	a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy PFS-2.4. Cost of New Infrastructure. The Town shall require that costs of improvements to the water system that are necessary for new developments are financed by the property owner and/or developer, based on determination of nexus of impacts created. (Source: Existing General Plan, Policy E.2.2 modified).	This policy has been modified on page 2-85 of the 2040 General Plan to update the wording. This updated policy would not alter the impact analysis contained in the Draft EIR but rather clarifies the policy language. The revised policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy PFS-3.11. Cost of New Infrastructure. The Town shall require that costs of improvements to the wastewater and water reclamation system that are necessary for new development are financed by the property owner or developer, based on determination of nexus of impacts created. (Source: Existing General Plan, Policy E.2.2 modified).	This policy has been modified on page 2-88 of the 2040 General Plan to update the wording. This updated policy would not alter the impact analysis contained in the Draft EIR but rather clarifies the policy language. The revised policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy LU-4.5. Variability within Boulevard Mixed-Use. Mixed-use development along the street-frontage within the Boulevard Mixed Use designation shall be vertical mixed-use, unless a project proponent can demonstrate that a vertical mixed-use frontage is not contextually appropriate given the location, scale, size, shape, or other characteristic of the site and its surroundings. Any proposed variation from vertical mixed use must meet the objectives identified in Policy LU-4.1 and serve to create a strong sense of place. Properties within the Boulevard Mixed Use designation that do not have frontage on a Crosstown Street shall not be required to be developed with mixed-use development. Residential development within the density range of the designation may be allowed without commercial uses on these properties. To the extent possible, development of these properties should consider opportunities to integrate with existing or future development of surrounding mixed-use parcels consistent with the measures identified in Policy LU-4.3.	This policy has been modified on page 2-19 of the 2040 General Plan to add additional exception language to address properties that do not have frontage on a Crosstown (Boulevard) street or only have limited frontage. This updated policy would not alter the impact analysis contained in the Draft EIR, but would clarify the existing policy language. The revised policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy LU-9.4. Airport Land Use Commission Referrals. Town shall ensure that proposals within Airport Land Use Commission (ALUC) referral areas consider land use policies in the ALUC Policy Plan and will review and condition development proposals, as appropriate, to ~~ensure~~ strive for compliance with ALUC regulations. (Source: Existing General Plan, Policy B.8.3, modified)	This policy has been modified on page 2-28 of the 2040 General Plan to update the wording. This updated policy would not alter the impact analysis contained in the Draft EIR but rather clarifies the policy language. The revised policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy 12.9. ~~Neighborhood Center Designated Parcels on Old Redwood Highway.~~ Neighborhood Interface Policy for Properties in Vicinity of Merner Drive. The following shall apply to parcels ~~designated "Neighborhood Center Mixed Use" within~~ designated for	This policy has been modified on pages 2-28 and 2-29 of the 2040 General Plan to update the wording. This updated policy would not alter the impact analysis contained in the Draft EIR but rather clarifies the policy language to apply to multiple land use designations. The revised policy would

higher intensity uses on the east side of the Old Redwood Highway corridor in the vicinity of Merner Drive that are located adjacent to parcels designated as Estate Residential.	not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy LU-14.1.d. School Site. A school site ~~shall~~ *may* be identified, in consultation with the Windsor Unified School District, if the School District determines this is an appropriate location for a school in cooperation with the property owner.	This policy has been modified on page 2-44 of the 2040 General Plan to update the wording. This updated policy would not alter the impact analysis contained in the Draft EIR but rather clarifies the policy language. The revised policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project
Policy LU-15.3. Road Improvements. To the extent that a nexus exists and as otherwise consistent with applicable laws, the Town shall require circulation improvements in the Eastern Edge Residential area to provide connections with existing neighborhoods~~.~~ ,including a new road linking Vinecrest Road to Pleasant Avenue. (Source: Existing General Plan, Policy B.7.26g, modified)	This policy has been modified on page 2-47 of the 2040 General Plan to include the extension of a new road from Vinecrest Road to Pleasant Avenue between Jensen Road. All mitigation measures included in the EIR would apply to the new roadway to ensure that any potential environmental impacts would be reduced to a less than significant level. This updated policy to add a new roadway would reduce traffic congestion in the eastern edge area of the Town and therefore reduce transportation and traffic impacts analyzed in the EIR. Therefore, this updated policy would not alter impact analysis findings contained in the Draft EIR, but rather further reduce transportation impacts. The updated policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.
Policy LU-15.6. Feathered Density of Estate Residential Area. The Town shall require the density of development within the Eastern Edge Residential area designated for Estate Residential to be "feathered", with a density ~~of up to 2 units per acre allowed on the western portion of the Estate Residential area lowering to a density of no greater than one unit per acre on average in the eastern portion of the area.~~ transitioning eastward from a minimum of 15,000 square feet per unit to 1 acre per unit.	This policy has been modified on page 2-48 of the 2040 General Plan to update the wording. This updated policy would not alter the impact analysis contained in the Draft EIR but rather clarifies the policy language to apply to revise the transitional density requirement. The revised policy would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and, therefore, would not require additional mitigation measures or alternatives to the proposed project.

Changes in 2040 General Plan Land Use Designations

Changes to 2040 General Plan policies since the Draft EIR was released and their effect on the Final EIR are shown in Table 49 below. As detailed below, none of these changes would result in a new significant environmental impact; a substantial increase in the severity of an environmental impact; or a feasible alternative or mitigation measure considerably different than those analyzed. Therefore, recirculation of the EIR is not warranted.

Table 49 2040 General Plan Land Use Designation Changes

Assessor's Parcel Number/2040 General Plan Land Use Designation	Effect on Final EIR
APN 164-350-010, General Business to Neighborhood Commercial Mixed-Use	Denser development from the change in land use would result in a minimal increase in population, air quality, and

	traffic but would not result in new significant impacts or a substantial increase in the severity of environmental impacts and all mitigation measures in the EIR would apply to the land use change. Therefore, the change would not require additional mitigation measures or alternatives to the proposed project.
APN 164-350-009, General Business to Neighborhood Commercial Mixed-Use	Denser development from the change in land use would result in minimal increase in population, air quality, and traffic but would not result in new significant impacts or a substantial increase in the severity of environmental impacts and all mitigation measures in the EIR would apply to the land use change. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
APN 164-150-012 and 164-150-064, Light Industrial to Retail Commercial	Retail commercial development resulting from the change in land use would not result in any increase in population in the General Plan Area. The land use change would result in a minimal increase in traffic but would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and all mitigation measures in the EIR would apply to the land use change. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
APN 163-172-017, Neighborhood Commercial Mixed-Use to Medium Density Residential	Development from the change in land use would result in a minimal increase in population and potential aesthetic and noise impacts, but would not result in new significant impacts or a substantial increase in the severity of environmental impacts. In addition, protections to maintain compatibility with adjacent lower density single-family neighborhoods and street-oriented design measures would be implemented for the parcel with Policy LU-12.9 from the 2040 General Plan and all mitigation measures from the EIR would apply. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
APN 164-020-023, Retail Commercial to Medium Density Residential	Development from the change in land use would result in a minimal increase in population because the parcel is currently designated Medium Density Residential. Therefore, impacts would be similar to the 2015 General Plan, but would not result in new significant impacts or a substantial increase in the severity of environmental impacts as all mitigation measures from the EIR would apply to the land use change. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
APN 161-580-018, Retail Commercial to High Density Residential	Development from the change in land use would result in a minimal increase in population because the parcel currently contains some residential units. In addition, there would be a minimal increase in potential aesthetic and noise impacts, but would not result in new significant impacts or a substantial increase in the severity of environmental impacts as all mitigation measures from the EIR would apply to the land use change. Traffic, air quality, and GHG impacts would be reduced because the High Density Residential land use would generate fewer daily trips. Therefore, this change would not require additional

	mitigation measures or alternatives to the proposed project.
APN 161-020-026, Very Low Residential/Estate Residential to Estate Residential	Development from the change in land use would have reduced impacts because estate residential involves less dense development as compared to Very Low Residential/Estate Residential. The land use change would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and all mitigation measures in the EIR would apply to the land use change. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
APNs 161-020-028, Very Low Density Residential, Low Density Residential, and Estate Residential to Estate Residential	Development from the change in land use would have reduced impacts because Estate Residential involves less dense development as compared to Very Low Residential/Low Density Residential/Estate Residential. The land use change would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and all mitigation measures in the EIR would apply to the land use change. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
APNs 161-020-029, 161-020-030, Low Density Residential and Estate Residential to Estate Residential	Development from the change in land use would have reduced impacts because Estate Residential involves less dense development as compared to Low Residential/Estate Residential. The land use change would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and all mitigation measures in the EIR would apply to the land use change. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
APNs 161-060-051 and 161-060-052, Boulevard Mixed-Use to Low Density Residential	Development from the change in land use would have reduced impacts because Low Density Residential involves less dense development as compared to Boulevard Mixed-Use. The land use change would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and all mitigation measures in the EIR would apply to the land use change. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
APN 161-100-065, Parks and Recreation to Open Space	Development from the change in land use would have reduced impacts because Parks and Recreation involves more intensive land use than open space. The land use change would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and all mitigation measures in the EIR would apply to the land use change. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
APN 059-310-063, Boulevard Mixed-Use and Very Low Density Residential to Very Low Density Residential	Development from the change in land use would have reduced impacts because Very Low Density Residential involves less dense development as compared to Boulevard Mixed-Use and Very Low Density Residential. The land use change would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and all mitigation measures in the EIR would apply

	to the land use change. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
APNs 163-130-030, 163-130-031, and 163-130-032, Medium Density Residential to Low Density Residential	Development from the change in land use would have reduced impacts because Low Density Residential involves less dense development as compared to Medium Density Residential. The land use change would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and all mitigation measures in the EIR would apply to the land use change. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
The following land use designation has been added to the 2040 General Plan: Mobile Home Park. 8109 Conde Lane, 6491, 6555 and 10281 Old Redwood Highway (APNs 164-100-004, 164-130-112, 163-012-026, 163-011-010 & -011, and 161-040-001), Medium Density Residential to Mobile Home Park. This designation recognizes existing land devoted to mobile home parks and is intended to preserve its use as a mobile home park.	The Mobile Home Park land use designation is included in the 2015 General Plan and will be retained in the 2040 General Plan with the same density/intensity range as the 2015 General Plan. The land use designation would not result in new significant impacts or a substantial increase in the severity of environmental impacts, and all mitigation measures in the EIR would apply to the land use designation. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
The Neighborhood Center Mixed-Use has been updated as follows: Neighborhood Center Mixed-Use (NCMU). The intention of the Neighborhood Center Mixed-Use designation is to create small-scale neighborhood centers where area residents can gather to socialize, shop, or recreate. Neighborhood Center Mixed Use allows for diverse uses, including residential, commerce, professional office, employment, entertainment, services, and culture located within the same building (vertical mixed use) or on the same site (horizontal mixed use). The intensity of development in the Neighborhood Center Mixed Use is lower than that in the other mixed-use designation to maintain compatibility with adjacent lower-density single-family neighborhoods. Areas located along Old Redwood Highway that are designated NCMU are subject to the requirements of Policy LU-12.9	The revision of the narrative description of the Neighborhood Mixed-Use land use designation to add residential as a permissible use would not result in new significant impacts or an increase in the severity of environment impacts, and all mitigation measures in the EIR would apply to the land use designation. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.
Vintana Subdivision (multiple APNs) change approximately 75 parcels in the Vintana subdivision to correctly match the land use designations prescribed for the subdivision in Town Council Ordinance 96-85.	Changing the land use designation for parcels within the Vintana Subdivision as prescribed in the Town Council Ordinance 96-85 would retain the residential character of the subdivision. This change would not result in new significant impacts or an increase in the severity of environment impacts, and all mitigation measures in the EIR would apply to the land use designation. Therefore, this change would not require additional mitigation measures or alternatives to the proposed project.