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DRAFT
Initial Study/Mitigated Negative Declaration
Mill Creek Development Project
Town of Windsor, Sonoma County, California

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ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
afy	acre-feet per year
APN	Assessor's Parcel Number
AQP	air quality plan
BMP	Best Management Practice
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
CTS	California tiger salamander
dB	decibel
dBA	decibel, A-weighted
DPM	diesel particulate matter
EPA	U.S. Environmental Protection Agency
FCS	FirstCarbon Solutions
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FTA	Federal Transit Administration
GHG	greenhouse gas
IS/MND	Initial Study/Mitigated Negative Declaration
L_{dn}	day/night sound level
L_{eq}	equivalent continuous sound level
LID	Low Impact Development
L_{max}	maximum sound level
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MIR	maximum impacted sensitive receptor
mph	miles per hour

MRZ	Mineral Resource Zone
MS4	municipal separate storm sewer system
MT	metric ton
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NWIC	Northwest Information Center
NWPRR	Northwestern Pacific Railroad
OHWM	ordinary high water mark
PM_{10}	particulate matter 10 microns or less in diameter
$PM_{2.5}$	particulate matter 2.5 microns or less in diameter
PPV	peak particle velocity
REL	reference exposure level
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
SMART	Sonoma-Marin Area Rail Transit
SRPCS	Santa Rosa Plain Conservation Strategy
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
VdB	vibration decibel
WWTP	Wastewater Treatment Plant

SECTION 1: INTRODUCTION

1.1 - Purpose

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to identify any potential environmental impacts from implementation of the Mill Creek Development Project in the Town of Windsor (Town), California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the Town is the Lead Agency in the preparation of this IS/MND and any additional environmental documentation required for the project. The Town has discretionary authority over the proposed project. The intended use of this document is to determine potential environmental impacts resulting from project implementation and to provide the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section provides a brief description of the project location and the characteristics of the project. Section 2 includes an environmental checklist giving an overview of the potential impacts that may result from project implementation. Each individual subsection elaborates on the information contained in the environmental checklist, along with justification for the responses provided in the environmental checklist.

1.2 - Project Location

The project site is located at 8703, 8711, and 8777 Bell Road and 8820 Larson Way in the Town of Windsor, Sonoma County, California (Exhibit 1). The 20.3-acre project site is approximately bounded by the Northwestern Pacific Railroad (NWPRR) right-of-way[1] (west and south), single-family residential uses and an apartment complex (north), and Windsor Creek (east) (Exhibit 2). The project site is located on the Healdsburg, California United States Geological Survey 7.5-Minute Topographical Quadrangle, Township 8 North, Range 9 West, Section 13 Mt. Diablo Base and Meridian (Latitude 38° 32’ 37” North; Longitude 122° 48’ 45” West).

1.3 - Environmental Setting

1.3.1 - Development and Land Use Activities

The project site consists of all or parts of eight parcels, Assessor’s Parcel Numbers (APNs) 164-010-020, 164-020-005, 164-020-006, 164-020-007, 164-020-008, 164-020-041, 066-170-013, and 066-170-033. APNs 164-020-005, 164-020-006, 164-020-008 and 164-020-041 were the site of the former Windsor Mill. APN 066-170-013 was the location of the former Empire Casting Plant, which manufactured low-pressure die-casting machines and molds. The machine shop, foundry, and office buildings were built in 1978 and were destroyed in a fire in 1991. APN 066-170-033 was the location of a former feed store and winery. APN 164-020-007 is currently owned by the Windsor Water District and contains a well.

[1] The NWPRR is the historic name of the railroad right-of-way; however, it is currently owned by Sonoma-Marin Area Rail Transit (SMART). This document will reference the historic name when discussing the rail line.

The project site is located on an irregular, roughly triangular-shaped area between the NWPRR right-of-way, which borders the project site on the south and west, and Windsor Creek, which runs along the east side of the site. The project site comprises two land areas shaped roughly like triangles. The northern portion is the smaller of the two and is located west of Bell Road and south of Johnson Street. The southern portion is located in the portion of the project site adjacent to Windsor Creek. Currently, the only road that provides access to the project site is the segment of Bell Road extending south from Windsor River Road. The site itself has an unpaved gravel road that was a part of Bell Road, along with several dirt tracks. A gate controls access to the site from Bell Road.

Except for the well, the project site contains undeveloped, disturbed land with unpaved roads (Exhibit 3). As already noted, the southern portion of the project site is adjacent to Windsor Creek, a stream that flows in a southwest direction to the Russian River. Windsor Creek contains a riparian area of trees, shrubs, and grasses along both its banks. Trees are also found along the railroad tracks and in small concentrations on portions of the project site; otherwise, the project site is mostly covered with grasses and weeds. Five small, seasonal wetlands have been identified within the southern portion of the project site, but no wetlands were identified in the northern portion.

1.3.2 - Land Use Designations

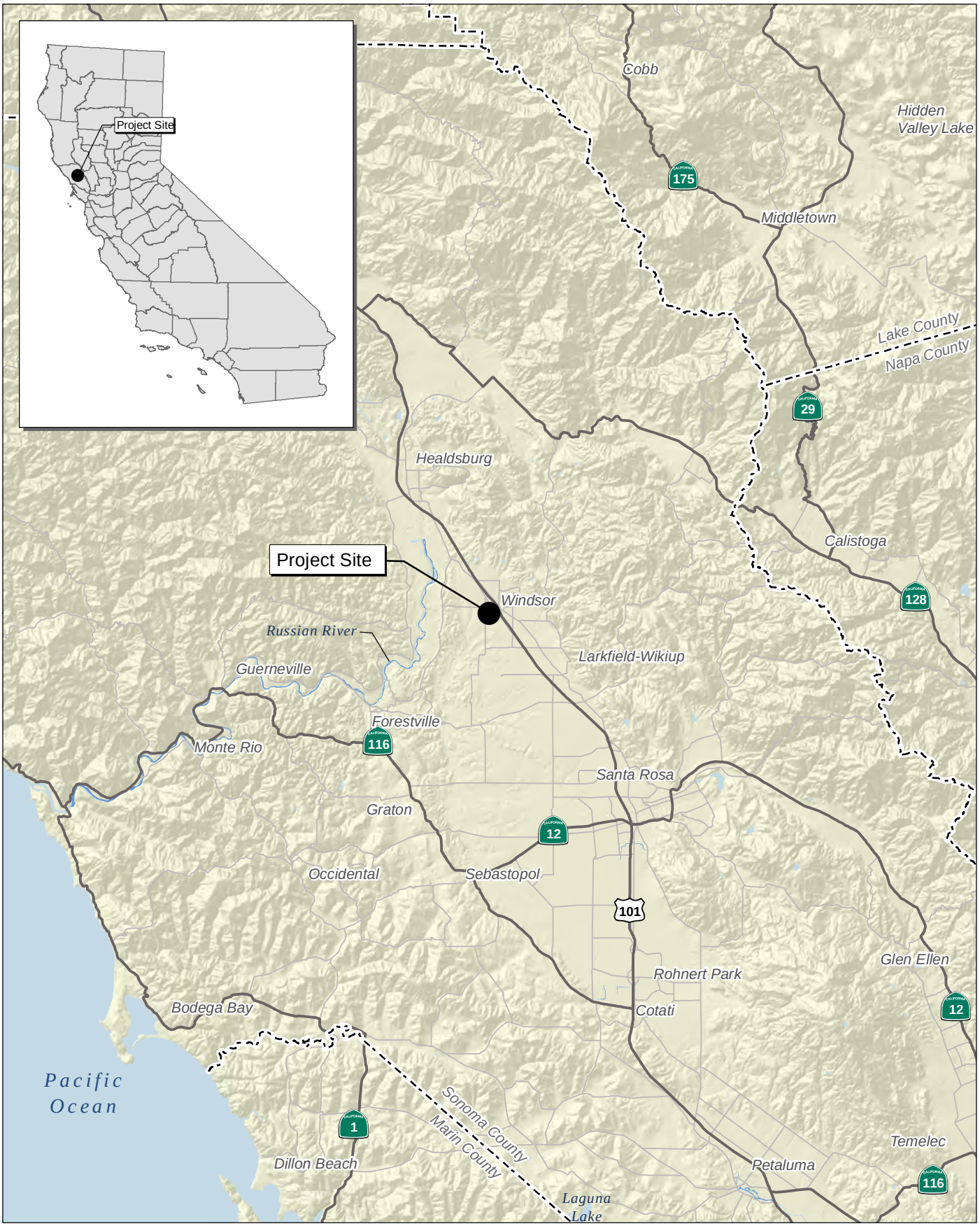
The Windsor General Plan currently designates the project site as High Density Residential (16 to 32 units per acre), Medium Density Residential (8 to 16 units per acre), and Low Density Residential (5 to 8 units per acre).

The project site is located within the boundaries of the Station Area/Downtown Specific Plan (Specific Plan), adopted by the Town in 2012 and amended in 2013. Under the Specific Plan, the project site is designated as a mixture of Compact Residential (12–24 units/acre), Medium Density Residential (8–16 units/acre), and Village Residential (5–8 units/acre), with a Potential New Park indicated for the site but no specified location. Since the parcels are located within the Specific Plan area, the requirements of the Specific Plan apply to the project.

The project site is zoned as Compact Residential (12–24 units/acre), Medium Density Residential (8–12 units/acre), and Village Residential (5–8 units/acre). If a standard is addressed by both the Specific Plan and the Town Zoning Ordinance, the Specific Plan would supersede. For this project, the densities specified by the Specific Plan are applicable.

1.4 - Project Description

The project applicant (Windsor Mill Community, LLC) proposes to develop 360 residential condominiums on the project site (Exhibit 4). Of these 360 condominium units, 126 would be ground floor flats, 230 would be “walk-up townhouses,” meaning two-story units located above the ground floor flats with accessible only by stairs. The other four units would be “carriage units”; that is, units located above garages.



Source: Census 2000 Data, The CaSIL.

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5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

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Source: Bing Aerial Imagery.

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1,000 500 0 1,000 Feet

Exhibit 2
Local Vicinity Map
Aerial Base

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Photograph 1: This is a view of the southern portion of the project site from approximate site center.



Photograph 2: This is a view of the northern portion of the project site from approximate site center.

Source: FirstCarbon Solutions, 2018.

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Exhibit 3
Site Photographs

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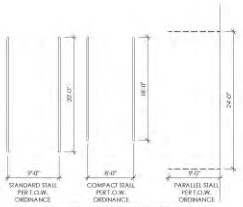


PARKING:

GARAGES- 1 CARx128 GARAGES	128 SPACES
GARAGES- 2 CARx16 GARAGES:	32 SPACES
GARAGES- SINGLE IN GARAGE BLDGS:	52 SPACES
TOTAL GARAGES = 196 GARAGES	
CARPORT PARKING:	166 SPACES
DRIVEWAY PARKING:	77 SPACES (COMPACT)
OPEN PARKING PARALLEL:	23 SPACES
OPEN PARKING PERPENDICULAR:	96 SPACES
	574 SPACES
	(1.59 PARKING RATIO)

PUBLIC STREET PARKING: 91 SPACES not counted

(1.85 PARKING RATIO IF COUNTED)



PARKING STALL DETAIL 1/8" = 1'-0"

PRODUCT SUMMARY - Windsor Mill- " WALK-UP PROTOTYPE"

Bldg Type	No. of Bldgs	Unit 1	Unit 2	Unit 3	Unit 4	Unit 5	Unit 6	Unit 7	Carriage Un	Units per Bldg	Garage Stalls	# Garages
G5	1									5	5	5
G8	1									8	8	8
G11	2								2	2	11	11
G12	1									0	12	12
Bldg T-11 plex	1	2	4			2	2	1		11	10	9
Bldg T-19 plex	1	1	8	1	4	2	2	1		19	10	9
Bldg T-23 plex	13	2	8	4	4	2	2	1		23	10	9
Bldg T-27 plex	1	2	8	6	6	2	2	1		27	10	9
TOTALS	20	31	124	59	62	32	32	16	4	360	192	176
											Provided covered parking	Provided garages overall

360 Units

Bedroom Count	No. of Units	% of total units	Parking Ratio w/ guest	Req'd parking stalls
1 Bedroom	96	26%	1.5	141
2 Bedroom	228	61%	2	436
3 Bedroom	48	13%	2.5	120
	360			697 Total Required Parking

Unit type	# Bedroom	Area (sf)	# Unit	Total area
Unit 1	1 Bedroom	833	32	26,656
Unit 2	2 Bedroom	1067	120	128,040
Unit 3	1 Bedroom	690	62	42,780
Unit 4	2 Bedroom	1343	62	83,266
Unit 5	2 Bedroom	1217	32	38,944
Unit 6	3 Bedroom	3454	32	46,528
Unit 7	3 Bedroom	1735	16	27,600
Carriage Unit	2 Bedroom	1140	4	4,560
	Avg.	1353		
		total:	360	396,374 Gross

0 60' 240'
30' 120'

N

Source: Angeleno Associates, Inc., February 2018.

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Exhibit 4
Conceptual Site Plan

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A total of 22 buildings would be constructed, 16 of which would contain the condominium units and six of which would be garages[2]. Table 1 provides a summary of the project.

Table 1: Project Summary

Use	Characteristics	Count
Residential	1-Bedroom Units	94
	2-Bedroom Units	218
	3-Bedroom Units	48
	Subtotal	360
Parking	Garage Spaces	212
	Carport Spaces	166
	Uncovered Spaces	196
	Subtotal	574
Amenities	Pool and Jacuzzi	Approximately 5,000 square feet
	Creekside Trail	Approximately 1,300 lineal feet
	Tot Lot	—
Note: Unit square footages calculated based on maximum square footage indicated. Sources: Town of Windsor, 2017; FCS, 2017.		

Five structures would be located in the northern portion of the project site. All remaining structures would be built on the southern portion.

The buildings would be three-story buildings constructed in Spanish, Monterey, and Craftsman styles, with features including tile roofs, stucco exterior and wrought iron railing, bay windows and balconies. The tallest building would stand 38 feet, 11 inches above finished grade.

The project would also include a two-story recreation and leasing center in the center of the southern portion of the project site. The recreation and leasing center proposes to have two offices, a fitness area, a lounge, and an Internet café on the first floor, and a club room and outdoor terrace on the second floor. Restrooms would be available on both floors, and an elevator and stairs would connect the two floors. An outdoor pool is proposed for installation east of the recreation and leasing center. The pool area would have a pergola, chaise lounge chairs, and a spa. A pool building would be constructed near the southeastern corner of the pool. The pool building would contain a shower facility, a pool equipment storage area, and restrooms.

[2] Two buildings would contain condominiums and garages.

1.4.1 - Vehicular Access

Public street access would be available to the project site via an extension of Bell Road from its current terminus at the northern site boundary through the site to the railroad, where it would parallel the tracks until connecting with a southern segment of Bell Road south of Windsor Creek. The proposed Bell Road extension would consist of two vehicle lanes approximately 11 feet in width, and each side containing a 6-foot-wide bike lane and 8 feet of width for street parking, along with curb and gutter. Planter strips 5 feet in width would be installed on both sides of the paved street. A bridge would be constructed over Windsor Creek to connect the Bell Road segments. The bridge would be approximately 47 feet wide and would have two 11-foot-wide vehicle lanes, two 6-foot-wide bike lanes, and 6.5-foot-wide sidewalks on each side. It is expected to be a pre-engineered concrete structure with cast-in-place abutments.

Another public street, Bill Beedie Way, would be extended from its current terminus at Johnson Street south along the railroad tracks until it intersects with the proposed Bell Road extension on the project site. Bill Beedie Way would have two 11-foot-wide vehicle lanes with 8 feet of width on each side for street parking, along with curb and gutter. A planter strip 5 feet in width would be installed along the east side of Bill Beedie Way.

Access to development on the northern portion would be available from an entryway from the extended Bell Road and an entryway from the extended Bill Beedie Way. Internal access to this portion would be provided through aisles varying from 27 to 37 feet in width. Development on the southern portion would be accessed from two driveways off the extended Bell Road. Three internal private streets would provide circulation for the southern portion development. The private streets would have two vehicle lanes, the total width of which would vary from 20 to 28 feet.

1.4.2 - Parking

The project would provide 574 off-street spaces, with 212 spaces within garages, 166 spaces under carports, and 196 uncovered spaces. Additionally, 91 on-street spaces would be available on public streets constructed by the project (Bell Road and Bill Beedie Way).

1.4.3 - Alternative Modes of Access

Bike lanes would be provided on the extended Bell Road and extended Bill Beedie Way. Sidewalks would be provided on the east side of Bell Road and along the east side of Bill Beedie Way.

The project proposes to maintain an open space area along Windsor Creek, with a creekside trail as a recreational amenity. This paved trail would be approximately 1,300 feet in length, 10 feet in width and would have 2 feet of shoulder on each side along with a split rail fence on the creek-side of the trail. In addition to the vehicular bridge, a concrete pedestrian bridge is also proposed across Windsor Creek. This pedestrian bridge—a Pratt truss or similar steel construction—would connect the southern portion of the project site to Windsor Creek Elementary School to the east.

1.4.4 - Utilities

Water and wastewater services would be provided by the Windsor Water District, which operates functionally as a department of the Town of Windsor. The project proposes to extend water and sewer lines onto the project site along the extended Bell Road and Bill Beedie Way. The project would connect to existing water and sewer lines beneath Bell Road and Bill Beedie Way to the north. Connections also would be made to water and sewer lines south of Windsor Creek via the proposed vehicular bridge. The existing well would be abandoned in accordance with County regulations once the project applicant acquires ownership of the parcel from the Windsor Water District.

The project proposes the installation of an on-site stormwater collection system. Storm drainage mains would be installed throughout the project site, collecting runoff from roadways, parking areas, and bioretention areas with drop inlets. The collected drainage would be conveyed to a stormwater detention basin at the southern tip of the project site. This basin would have an outlet structure that would release water to an existing 72-inch-diameter storm drain outfall to Windsor Creek.

Electricity and natural gas services would be provided to the project site. Existing overhead electrical lines and an underground natural gas line are located on or adjacent to the project site.

1.4.5 - Other Project Features

The project proposes a landscaping plan that incorporates the existing Windsor Creek tree canopy as part of the landscape (Exhibit 5). Street trees would be planted along both sides of Bell Road and Bill Beedie Way, and trees and other landscaping would be installed throughout the project site. Screening plantings would be made along the boundary of the project site and the residential areas to the north. A play area is proposed in front of the five- and eight-space garages in the southern portion of the project site. Irrigation equipment would be installed to water the on-site landscaped areas.

The project proposes three areas where trash dumpsters would be kept. The dumpsters would be in enclosures made of stucco with roofs of asphalt shingles. A metal gate would allow solid waste collection trucks to access the dumpsters.

1.5 - Required Discretionary Approvals

The proposed project would require the following discretionary approvals from the Town of Windsor:

- Use Permit
- Tentative Subdivision Map
- Design Review
- IS/MND adoption

1.6 - Intended Uses of this Document

This IS/MND has been prepared to determine the appropriate scope and level of detail required in completing the environmental analysis for the proposed project. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding

the proposed project. The Draft IS/MND will be circulated for a minimum of 30 days, during which period comments concerning the analysis contained in the IS/MND should be sent to:

Kenneth MacNab, Community Development Director
Town of Windsor
Planning Department
9291 Old Redwood Highway, Building 400
Windsor, California 95492
Phone: 707.838.1021
Fax: 707.838.7349
Email: kmacnab@townofwindsor.com



KEY PLAN

SCALE: 1"=100'

PLANT LIST

Large Trees & Specimens

Botanical Name	Common Name	HxW	Spacing	WUCOLS	Size
Quercus agrifolia	Coast Live Oak	30'-70'x25'-80'	50'	Very Low	Transplan
Quercus lobata	Valley Oak	70'x70'	60'	Low	Transplan
Quercus phellos	Willow Oak	60-75'	45'	Moderate	36" Box
Platanus racemosa	California Sycamore	30'-80'x30'-50'	50'	Moderate	36" Box
Quercus coccinea	Scarlet Oak	60'-80'x40'-60'	50'	Moderate	36" Box
Ginkgo biloba 'Autumn Gold'	Maidenhair tree	45'x35'	35'	Moderate	36" Box
Acer x freemanii 'Autumn Blaze'	Autumn Blaze Maple	50'x40'	40'	Moderate	36" Box
Zelkova serrata	Japanese Zelkova	60'x60'	60'	Moderate	36" Box
Nyssa sylvatica	Sour Gum, Tupelo	30'-50'x20'-30'	25'	Moderate	36" Box
Taxodium distichum 'Mickelson'	Shawnee Brave Bald Cypress	50-70'x20'	20'	Moderate	36" Box
Salix laevigata	Polished Willow	20-30'x30-50'	30'	High	24" Box

Small Trees/Large Shrubs

Botanical Name	Common Name	HxW	Spacing	WUCOLS	Size
Aesculus californica	Buckeye	10'-20'x30'	30'	Very Low	24" Box
Cercis occidentalis	Western Redbud	10'-18'x10'-18'	15'	Very Low	24" Box
Cercidium 'Desert Museum'	Desert Museum Palo Verde	20'x20'	20'	Very Low	24" Box
Lagerstroemia 'Natchez'	Natchez Crape Myrtle	20'x20'	20'	Low	24" Box
Chitalpa tashkentensis 'Pink Dawn'	Pink Dawn Chitalpa	20-35'x20-35'	30'	Low	24" Box
Cornus florida	White Eastern Dogwood	25'-30'x20'-30'	30'	Moderate	24" Box
Carpinus betulus 'Frans Fontaine'	Columnar Hornbeam	35'x15'	15'	Moderate	24" Box
Chionanthus retusus	Chinese Fringe Tree	15'-20'x10'-15'	15'	Moderate	24" Box
Tipuana tipu	Tipu Tree	20-30'x20-30'	20'	Moderate	24" Box

Screening Shrubs

Botanical Name	Common Name	HxW	Spacing	WUCOLS	Size
Nandina domestica	Heavenly Bamboo	6'-8'x3'-4'	48"	Low	5 gal
Cupressus sempervirens	Italian Cypress	60'x5'	6'	Low	10 gal
Taxus x media 'Hicksii'	Hick's Yew	10'x4'	4'	Moderate	5 gal
Myrica californica	Pacific Wax Myrtle	20-30'x10-20'	10'	Moderate	10 gal

Courtyard Planting

Botanical Name	Common Name	HxW	Spacing	WUCOLS	Size
Lavandula angustifolia	English Lavender	2'-3'x3'	36"	Low	1 gal
Lavandula angustifolia 'Hidcote'	Hidcote Blue English Lavender	12"x12"	12"	Low	1 gal
Sedum rupestre 'Angelina'	Angelina Stonecrop	6"x3'	2-3'	Low	1 gal
Sedum spectabile 'Autumn Joy'	Autumn Joy Stonecrop	2'x2'	2'	Low	1 gal
Kniphofia citrina	Torch Lily	3'x1.5'	18"	Low	1 gal
Deschampsia cespitosa	Tufted Hairgrass	1'-2'x2'	2'	Low	1 gal
Muhlenbergia capillaris 'Regal Mist'	Pink Muhly Grass	4'x4'	4'	Low	1 gal
Muhlenbergia rigens	Deer Grass	4'x4'	4'	Low	5 gal
Phormium tenax 'Amazing Red'	Amazing Red New Zealand Flax	3'x3'	4'	Low	5 gal
Sarcococca ruscifolia	Fragrant Sweet Box	3-5'x3-5'	5'	Low	5 gal
Spiraliina chamaecyparissus	Lavender Cotton	2'x3'	36"	Low	1 gal
Hakonechloa macra 'All Gold'	Japanese Forest Grass	18"x24"	2'	Low	1 gal
Carex divulsa	Berkeley Sedge	18"x24"	2'	Low	1 gal
Mahonia 'Soft Caress'	Soft Caress Mahonia	3'x3'	3'	Low	3 gal
Rumohara adiantiformis	Leatherleaf Fern	3'x3'	4'	Moderate	1 gal
Dryopteris erythrosora	Autumn Fern	1.5'x1.5'	2'	Moderate	1 gal
Athyrium niponicum 'Pictum'	Regal Japanese Painted Fern	2'x2'	24"	Moderate	1 gal
Clytostoma callistegioides	Lavender Trumpet Vine	to 25'	18"	Moderate	24" ht
Clematis (evergreen varities)	Clematis	climb to 15'	18"	Moderate	24" ht
Chamaecyparis pisifera 'Golden Mop'	Gold Mop False Cypress	3'x4'	4'	Moderate	5 gal
Carex buchananii	Leather Leaf Sedge	3'x2'-2.5'	2.5'	Moderate	1 gal
Festuca idahoensis 'Siskiyou Blue'	Blue Fescue	1'-1.5'x1'-1.5'	18"	Moderate	1 gal
Buxus sempervirens	English Boxwood	3'-4'x3'-4'	4'0"	Moderate	3 gal
Euphorbia 'Blackbird'	Blackbird Spurge	2'x2'	18"	Moderate	1 gal
Echinacea purpurea	Coneflower	3'-4'x2'	24"	Moderate	1 gal
Astilbe japonica (multiple varieties)	False Goat's Beard	24"x24"	18"	Moderate	1 gal
Penstemon h. 'Margarita BOP'	Blue Bedder Penstemon	2'-3'x2'	30"	Moderate	5 gal
Polystichum munitum	Western Sword Fern	3'-4'x3'-4'	4'	Moderate	5 gal
Woodwardia fimbriata	Giant Chain Fern	4-5'x3'	3'	Moderate	5 gal

Site Planting

Botanical Name	Common Name	HxW	Spacing	WUCOLS	Size
Lavandula angustifolia	English Lavender	2'-3'x3'	36"	Low	1 gal
Calycanthus occidentalis	Western Spice Bush	4'-12'x4'-12'	8'	Low	5 gal
Eriogonum fasciculatum	California Buckwheat	2'-3'x3'-5'	48"	Low	1 gal
Mimulus aurantiacus 'Orange'	Orange Monkey Flower	3'x3'	36"	Low	1 gal
Ceanothus maritimus 'Valley Violet'	Valley Violet Ceanothus	3'-4'x3'-4'	4'0"	Low	5 gal
Myrtus communis 'Compacta'	Dwarf Myrtle	2'-4'x2'-4'	36"	Low	5 gal
Nandina domestica 'Compacta'	Compact Heavenly Bamboo	4'-5'x3'	36"	Low	5 gal
Sedum spectabile 'Autumn Joy'	Autumn Joy Stonecrop	2'x2'	2'	Low	1 gal
Nandina domestica 'Harbor Dwarf'	Spreading Dwarf Heavenly Bamboo	2'-3'x3'-4'	4'0"	Low	3 gal
Salvia clevelandii 'Winifred Gilman'	Blue Sage	3'x3'	36"	Low	1 gal
Salvia microphylla 'Hot Lips'	Hot Lips Autumn Sage	2-3'x2-3'	30"	Low	1 gal
Mahonia 'Soft Caress'	Soft Caress Mahonia	3'x3'	3'	Low	5 gal
Yucca gloriosa 'Walbristar'	Bright Star Yucca	1-2'x3'	5'	Low	2 gal
Yucca filamentosa 'Color Guard'	Adam's Needle	3-5'x4'	4'	Low	5 gal
Westringia fruticosa 'Morning Light'	Morning Light Coast Rosemary	3'-4'x3'-4'	4'0"	Low	5 gal
Calamagrostis 'Karl Foerster'	Feather Reed Grass	2'-3'x2'-3'	24"	Low	1 gal
Dietes bicolores	Fortnight Lily	2'-3'x3'-4'	3'	Low	1 gal
Muhlenbergia rigens	Deer Grass	4'x4'	4'	Low	1 gal
Pennisetum alopecuroides 'Hameln'	Dwarf Fountain Grass	2-3'x2'	2'	Low	1 gal
Achillea millefolium	Yarrow	2'x2'	24"	Low	1 gal
Mahonia aquifolium 'Orange Flame'	Orange Flame Oregon Grape	2'-3'x3'-4'	4'0"	Moderate	3 gal
Rosa 'Flower Carpet White'	White Carpet Rose	2'x3'	3'	Moderate	2 gal
Panicum virgatum 'Shenandoah'	Switch Grass	3-4'x3'	3'	Moderate	1 gal
Sesleria autumnalis	Autumn Moor Grass	1'-2'x1'-2'	2'	Moderate	1 gal
Leucanthemum x superbum	Shasta Daisy	3'-4'x2-3'	3'	Moderate	1 gal
Artemisia 'Powis Castle'	Powis Castle Artemisia	3'x6'	6'	Moderate	3 gal
Miscanthus sinensis 'Morning Light'	Maiden Grass	4-5'x3-4'	3'	Moderate	1 gal

SAMPLE PLANT MATERIAL IMAGERY (continued on Sheet L2.01)

Street and Character Trees



Valley Oak | Autumn Blaze Maple | London Plane Tree | Autumn Gold Ginkgo | Zelkova | Sour Gum

Medium and Small Trees



California Buckeye | Western Redbud | White Fringe Tree | Desert Museum Palo Verde | Natchez Crape Myrtle

Screening Planting



Heavenly Bamboo | Hick's Yew | Italian Cypress | Pacific Wax Myrtle

Stormwater Planting

Botanical Name	Common Name	HxW	Spacing	WUCOLS	Size
Asclepias fascicularis	Narrow-leaved Milkweed	3'x1'	18"	Low	1 gal
Asclepias speciosa	Showy Milkweed	4'x1'	18"	Low	1 gal
Achillea millefolium	Yarrow	2'x2'	24"	Low	1 gal
Carex tumulicola	Foothill Sedge	1.5'x2'	2'	Low	1 gal
Iris douglasiana	Pacific Coast Iris	2'x4'	2'	Low	1 gal
Sedum spectabile 'Autumn Joy'	Autumn Joy Stonecrop	2'x2'	2'	Low	1 gal
Lomandra longifolia 'Breeze'	Dwarf Mat Rush	3'x4'	3'	Low	1 gal
Juncus patens 'Elk Blue'	Elk Blue California Gray Rush	2'x2'	2'	Low	1 gal
Chasmanthium latifolium	Northern Sea Oats	3-5'x2'	2'	Low	1 gal
Carex festacea 'Indian Summer'	Prairie Fire Sedge	18"x24"	18"	Moderate	1 gal
Liatris spicata	Gayfeather	36"x36"	36"	Moderate	1 gal
Astilbe chinensis	False Goat's Beard	18"x18"	18"	Moderate	1 gal
Echinacea purpurea	Coneflower	3'-4'x2'	24"	Moderate	1 gal
Juncus effusus 'Elk Blue'	Spreading Rush	2'-4'x2'	24"	Moderate	1 gal
Panicum virgatum 'Heavy Metal'	Heavy Metal Switch grass	4-5'x2'	24"	Moderate	5 gal

Source: Quadriga landscape architecture and planning, inc., February 2018.

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Exhibit 5
Landscape Plan

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SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected					
The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.					
☐	Aesthetics	☐	Agriculture and Forestry Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural/Tribal 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	☐	Utilities/Services Systems	☐	Mandatory Findings of Significance

Environmental Determination

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measure based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Date: October 11, 2018 Signed: _____

Kenneth MacNab

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
1. Aesthetics *Would the project:*				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Environmental Evaluation

Would the project:

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

No impact.

The primary scenic vistas in the Town of Windsor are wooded ridges, hillsides, and ridgelines. The Town does not have any officially designated ridgelines in the General Plan; however, it does designate scenic corridors and landforms as described below. General Plan Goals I.1 and I.2 aim to preserve significant landforms surrounding the community and maintain significant views from major corridors. General Plan policies would ensure that these backdrops, hillsides, and landforms would be retained. For example, development along scenic corridors would need to consider project design features and setbacks in order to avoid detracting from views. In addition, the Town would restrict development on ridges, hilltops, and landforms to preserve natural features.

The project is located approximately 2,900 feet northeast of the scenic corridor portion of Windsor Road and 1,950 feet west of U.S. Highway 101. The project site is not visible from either scenic corridor. The project site does not contain ridges, hillsides, or ridgelines, and view of such features are mostly obstructed from the site. In addition, the project would be subject to General Plan policies and implementation programs that preserve and protect scenic resources. Therefore, the project would not have a substantial adverse effect on a scenic vista. No impacts would occur.

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

No Impact. The nearest officially designated state scenic highway is State Route 116, located approximately 6.5 miles to the southwest. The Town of Windsor General Plan designates U.S. Highway 101 and other rural roads in Windsor as scenic corridors. The project's setback, building heights, massing, orientation, color, building materials, and landscaping would not be visible from U.S. Highway 101 or the nearest designated scenic corridor, which is the southern portion of Windsor Road located approximately 2,900 feet southwest of the site. Therefore, the project would not substantially damage scenic resources such as, trees, rock outcroppings, and historic buildings within view from a state scenic highway. No impacts would occur.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than significant impact. The project site currently consists of vacant, disturbed land, which previously supported a mill and other land uses. The project site is bounded by the NWPRR right-of-way to the west and south, single-family residential uses and apartment complex to the north, and Windsor Creek to the east.

The project's architectural style and landscaping has been designed to be compatible with the surrounding neighborhood's residential character. The project would maintain open space area and a trail along Windsor Creek. Bell Road would extend through the project site with the bridge over Windsor Creek in the southern portion of the site. The project also includes a pedestrian bridge over Windsor Creek, connecting the project site to Windsor Creek Elementary School. The project would be required to be consistent with all site and building design policies in the General Plan. Therefore, the project would not substantially degrade the existing visual character or quality of the site and its surroundings. As a result, impacts would be less than significant.

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

Less than significant impact. The project proposes to develop 360 residential units with associated parking on a site that is currently vacant. As a result, the project would increase the amount of light and glare from the project site, compared with existing conditions. The new sources of light would come from interior and exterior lighting, as well as some glare reflecting off building surfaces.

The project would comply with applicable General Plan and zoning regulations regarding the lighting design and building materials designed to limit trespass lighting and glare. Section 27.20.030.D of the Windsor Municipal Code states performance standards for lighting and glare. To ensure glare control, outdoor lighting shall be indirect or diffused and downwards, away from adjacent properties and public right of ways. In addition, the project would plant trees along all sides of the development, which would limit light and glare impacts to surrounding residential areas. Therefore, the project would not create a new source of light or glare that would substantially affect day or nighttime views in the area. As a result, impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
2. Agriculture and Forestry Resources *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:*				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No impact. The project site does not support agricultural activities. The California Department of Conservation Farmland Mapping and Monitoring Program designates the project site as "Urban and

Built-Up Land." The project site and its surrounding area is developed land, and there are no agricultural operations in the vicinity. Therefore, development of the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.

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

No impact. The Station Area/Downtown Specific Plan (Specific Plan) zones the project site Village Residential (5–8 units/acre), Medium Density Residential (8–16 units/acre), and Compact Residential (12–24 units/acre), all of which are non-agricultural zoning districts. The project site does not support agricultural land use activities and, therefore, is not eligible for a Williamson Act contact. Therefore, the proposed project would not conflict with existing agricultural zoning or with a Williamson Act contract. No impact would occur.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No impact. The Station Area/Downtown Specific Plan (Specific Plan) zones the project site Village Residential (5–8 units/acre), Medium Density Residential (8–16 units/acre), and Compact Residential (12–24 units/acre), all of which are non-forest land zoning districts. This condition precludes the possibility of a conflict with a forest zoning designation. No impact would occur.

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

No impact. The project site does not contain, nor is it adjacent to, any forested land. As stated in the Public Resources Code, "Forest land" is land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. There would be no loss of forest land or conversion of forest land to non-forest use as a result of the project. No impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No impact. The project is not adjacent to or in the immediate vicinity of any existing agricultural land or operations. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance in Windsor. The project is not considered suitable forest land. This condition precludes the possibility of the loss of forest land. Therefore, no impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
3. Air Quality *Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.* *Would the project:*				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	☐	☒	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Environmental Evaluation

Where available, the significance criteria established or recommended by the Bay Area Air Quality Management District (BAAQMD) were used to make the following CEQA significance determinations. The BAAQMD has adopted standards of significance for construction and operation. The thresholds of significance are shown in Table 2. In developing thresholds of significance for air pollutants, the BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Table 2: BAAQMD Thresholds of Significance

Pollutant	Construction Thresholds Average Daily Emissions (pounds/day)	Operational Thresholds	
		Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
Criteria Air Pollutants			
ROG	54	54	10

Table 2 (cont.): BAAQMD Thresholds of Significance

Pollutant	Construction Thresholds Average Daily Emissions (pounds/day)	Operational Thresholds	
		Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
NO_X	54	54	10
PM_{10} (exhaust)	82	82	15
$PM_{2.5}$ (exhaust)	54	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance, other Best Management Practices (BAAQMD Basic Construction Mitigation Measures)	Not Applicable	
Health Risks and Hazards for New Sources			
Excess Cancer Risk	10 per one million	10 per one million	
Chronic or 1-hour Acute Hazard Index	1.0	1.0	
Incremental annual average $PM_{2.5}$	0.3 µg/m^3	0.3 µg/m^3	
Health Risks and Hazards for Sensitive Receptors (Cumulative from All Sources within 1,000-Foot Zone of Influence) and Cumulative Thresholds for New Sources			
Excess Cancer Risk	100 per 1 million		
Chronic Hazard Index	10.0		
Annual Average $PM_{2.5}$	0.8 µg/m^3		
Accidental Release of Acutely Hazardous Air Pollutants			

Notes:
ROG = reactive organic gases, NO_X = nitrogen oxides, CO= carbon monoxide
PM_{10} = course particulate matter or particulates with an aerodynamic diameter of 10 µm or less
$PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5 µm or less
Source: BAAQMD 2017.

Would the project:

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

Less than significant impact with mitigation incorporated. The project is located in southern Sonoma County, where air quality is regulated by the BAAQMD. The region is non-attainment for the federal and state ozone standards, the state PM_{10} standards, and the federal and state $PM_{2.5}$ standards. The region is attainment or unclassified for all other ambient air quality standards. BAAQMD prepares air quality plans (AQPs) that include projected emissions inventories and account for emission reductions strategies in order to demonstrate how the region will achieve the ambient air quality standards by the

given deadlines. BAAQMD recommends that projects consider three criteria to determine if a project would conflict with or obstruct implementation of an applicable AQP.

1. **Does the project support the primary goals of the AQP?** As discussed under Impact 3b, the project's construction and operational emissions would not exceed BAAQMD regional thresholds of significance on a daily or annual basis. Therefore, the project would not result in a significant unavoidable impact and would be consistent with the goals of the applicable AQP.
2. **Does the project include applicable control measures from the AQP?** As discussed under Impact 3b, BAAQMD does not recommend a numerical threshold for fugitive dust particulate matter emissions. Instead, BAAQMD bases the determination of significance for fugitive dust on a consideration of the control measures to be implemented. Mitigation Measure (MM) AIR-1 would require the project to implement Best Management Practices (BMPs) that include Basic Construction Mitigation Measures specified in the BAAQMD CEQA Air Quality Guidelines, which would be consistent with the assumptions in the AQP. Furthermore, the project would comply with all applicable BAAQMD rules and regulations.
3. **Does the project disrupt or hinder implementation of AQP control measures?** The project would comply with all required control measures and rules and regulations required by BAAQMD during construction and operation. The project would not include any special features that would disrupt or hinder implementation of the AQP control measures.

Considering the information above, the project would not conflict with or obstruct implementation of the applicable AQP. This impact would be less than significant with mitigation.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less than significant impact with mitigation incorporated. This impact relates to localized criteria pollutant impacts. Potential localized impacts would be exceedances of state or federal standards for oxides of nitrogen (NO_X), particulate matter (PM_{10} and $PM_{2.5}$), or carbon monoxide (CO). NO_X emissions are of concern because of potential health impacts from exposure to NO_X emissions during both construction and operation and as a precursor in the formation of airborne ozone. PM_{10} and $PM_{2.5}$ are of concern during construction because of the potential to emit exhaust emissions from the operation of off-road construction equipment and fugitive dust during earth-disturbing activities (construction fugitive dust). CO emissions are of concern during project operation because operational CO hotspots are related to increases in on-road vehicle congestion.

Reactive organic gas (ROG) emissions are also important because of their participation in the formation of airborne ozone. Ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and that can cause substantial damage to vegetation and other materials. Elevated ozone concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, elderly, and young children. Construction and operational emissions are discussed separately below.

Construction Emissions

During construction, fugitive dust (PM_{10} and $PM_{2.5}$) would be generated from site grading and other earth-moving activities. The majority of this fugitive dust would remain localized and would be deposited near the project site. However, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce the emissions from this source. Exhaust emissions would also be generated from the operation of the off-road construction equipment, as shown in Table 6.

Construction Fugitive Dust

BAAQMD does not recommend a numerical threshold for fugitive dust particulate matter emissions. Instead, BAAQMD bases the determination of significance for fugitive dust on a consideration of the control measures to be implemented. If all appropriate emissions control measures are implemented for a project as recommended by BAAQMD, then fugitive dust emissions during construction are not considered significant.

As required by Mitigation Measure AIR-1, the project would implement BMPs recommended by BAAQMD for fugitive dust emissions during construction. Therefore, with mitigation, short-term construction impacts associated with violating an air quality standard or contributing substantially to an existing or projected air quality violation would be less than significant.

Construction: ROG, NO_X, PM_{10}, $PM_{2.5}$

Construction of the project was assumed to begin in April of 2019 and conclude in November of 2020. The construction schedule used to estimate emissions is shown in Table 3. Construction emissions would decrease because of improvements in technology and more stringent regulatory requirements if the construction schedule moves to later years. The off-road construction equipment list is shown by construction phase in Table 4. The exhaust emissions generated by construction equipment are based on the hours of operation, horsepower, and load factors of the equipment. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA guidelines. Based on applicant-provided information, it was assumed that 17,400 cubic yards of material would be exported during the grading phase. The number of off-site trips assumed to occur during construction of the project is shown in Table 5. Annual project construction emissions prior to the application of mitigation are shown in Table 6. Average daily construction emissions are compared with the significance thresholds in Table 7.

Table 3: Construction Schedule

Phase	Phase Start Date	Phase End Date	Total Number Of Working Days
Site Preparation	4/1/2019	4/12/2019	10
Grading	4/13/2019	5/24/2019	30
Paving	5/25/2019	6/21/2019	20
Building Construction	6/22/2019	9/25/2020	330
Architectural Coating	9/26/2020	11/20/2020	40
Source: CalEEMod Output (see Appendix A).			

Table 4: Construction Equipment Assumptions

Activity	Equipment	Amount	Hours per Day	Horse-power	Load Factor
Site Preparation	Rubber Tired Dozers	3	8	247	0.40
	Tractors/Loaders/Backhoes	4	8	97	0.37
Grading	Excavators	2	8	158	0.38
	Graders	1	8	187	0.41
	Rubber Tired Dozers	1	8	247	0.40
	Scrapers	2	8	367	0.48
	Tractors/Loaders/Backhoes	2	8	97	0.37
Building Construction	Cranes	1	7	231	0.29
	Forklifts	3	8	89	0.20
	Generator Sets	1	8	84	0.74
	Tractors/Loaders/Backhoes	3	7	97	0.37
	Welders	1	8	46	0.45
Paving	Pavers	2	8	130	0.42
	Paving Equipment	2	8	132	0.36
	Rollers	2	8	80	0.38
Architectural Coating	Air Compressors	1	6	78	0.48
Source: CalEEMod Output (see Appendix A).					

Table 5: Construction Off-site Trips

Construction Phase	Construction Trips		
	Worker Trips per Day	Vendor Trips per Day	Total Haul Trips
Site Preparation	18	0	0
Grading	20	0	2,175
Building Construction	447	112	0
Paving	15	0	0
Architectural Coating	89	0	0
Source: Source: CalEEMod Output (see Appendix A).			

Table 6: Annual Construction Emissions (Unmitigated)

Construction Phase	Tons/Year			
	ROG	NO_X	PM_{10} (Exhaust)	$PM_{2.5}$ (Exhaust)
Site Preparation	0.02	0.23	0.01	0.01
Grading	0.08	1.17	0.04	0.03
Paving	0.03	0.15	0.01	0.01
Building Construction	0.81	5.88	0.22	0.20
Architectural Coating	2.96	0.04	< 0.01	< 0.01
Total Construction Emissions	**3.90**	**7.47**	**0.28**	**0.26**

Notes:
ROG = reactive organic gases NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
Calculations use unrounded numbers.
Source: CalEEMod Output (see Appendix A).

Table 7: Construction Emissions (Unmitigated Average Daily Rate)

Parameter	Air Pollutants			
	ROG	NO_X	PM_{10}[1]	$PM_{2.5}$[1]
Total Emissions (tons/yr)	3.90	7.47	0.28	0.26
Total Emissions (lbs/yr)	7,799	14,940	552	517
Average Daily Emissions (lbs/day)[2]	18.14	34.74	1.28	1.20
Significance Threshold (lbs/day)	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
[1] Exhaust only
[2] Calculated by dividing the total lbs by the total 430 working days of construction for the duration of construction (2019–2020).
Calculations use unrounded totals.
lbs = pounds ROG = reactive organic gases NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns in diameter
$PM_{2.5}$ = particulate matter 2.5 microns in diameter
Source: CalEEMod Output (see Appendix A).

As shown in Table 7, the construction emissions for all years are well below the recommended thresholds of significance. The project would implement Mitigation Measure AIR-1 with BMPs recommended by the BAAQMD. As such, the dust control measures described above and BMPs that reduce fugitive dust emissions from the construction equipment would be incorporated as Mitigation Measure AIR-1 to further reduce potential impacts. Therefore, project construction would have a less than significant impact after implementation of mitigation.

Operational Emissions

Pollutants of concern include ROG, NO_X, PM_{10}, and $PM_{2.5}$. The project operational emissions for the respective pollutants were calculated using the California Emissions Estimator model (CalEEMod version 2016.3.2). Operations were assumed to begin in 2020. The operational emissions were modeled for summer and winter seasons. The results for the estimated maximum daily emissions are presented in Table 8. The unmitigated daily operational emissions would be less than significant.

Table 8: Unmitigated Daily Operational Emissions

Emissions Source	Pounds per Day			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Area	11.50	1.39	0.25	0.25
Energy	0.20	1.75	0.14	0.14
Mobile	5.21	23.55	11.50	3.21
Estimated Maximum Daily Emissions	16.92	26.69	11.89	3.60
Thresholds of Significance	**54**	**54**	**82**	**54**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
ROG = reactive organic gases NO_X = nitrous oxides
PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
Source: CalEEMod Output (see Appendix A).

As shown in Table 9, the annual operational emissions are below the thresholds of significance.

Table 9: Annual Operational Emissions

Emissions Source	Tons per Year			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Area	1.99	0.04	0.02	0.02
Energy	0.04	0.32	0.03	0.03
Mobile	0.85	4.18	2.00	0.56
Estimated Annual Emissions	2.88	4.54	2.04	0.60
Thresholds of Significance	**10**	**10**	**15**	**10**
Exceeds Significance Threshold?	No	No	No	No

Notes:
ROG = reactive organic gases NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
Source: CalEEMod Output (see Appendix A).

Carbon Monoxide Hotspot

The CO emissions from traffic generated by the project are a concern at the local level. Congested intersections can result in high, localized concentrations of CO.

The BAAQMD recommends a screening analysis to determine if a project has the potential to contribute to a CO hotspot. The screening criteria identify when site-specific CO dispersion modeling is necessary. The project would result in a less than significant impact to air quality for local CO if the following screening criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans; or
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; or
- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

As indicated in Section 16, Transportation/Traffic, the project would not conflict with the applicable congestion management plan. No intersections impacted by the project would experience traffic volumes of 44,000 vehicles per hour. According to the transportation impact study prepared for the project by TJKM Transportation Consultants, the intersection of Lakewood Drive and Old Redwood Highway would experience the highest cumulative peak-hour traffic volumes among the intersections impacted by the project, with 4,361 vehicles per hour during the PM peak hour during the Cumulative 2040 Plus Project Scenario. Therefore, the proposed project would not exceed the CO screening criteria. Furthermore, the adjacent roadways are not located in an area where vertical or horizontal mixing is substantially limited. Therefore, based on the above criteria, the project would have a less than significant impact related to CO.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?

Less than significant impact with mitigation incorporated. As shown in Tables 10, 11, and 12, the project's construction and operational emissions are below BAAQMD's project-level thresholds of significance. The thresholds of significance represent the allowable amount of emissions each project can generate without generating a cumulatively considerable contribution to regional air quality impacts. As discussed above, the region is non-attainment for the federal and state ozone standards, the state PM_{10} standards, and the federal and state $PM_{2.5}$ standards. Therefore, a project that would not exceed the BAAQMD thresholds of significance on a project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. Given this, the project's construction and operational emissions would not make a cumulatively

considerable contribution to the existing regional air quality impacts after implementation of Mitigation Measure AIR-1. This impact would be cumulatively less than significant.

Construction Emissions

Emissions from construction-related activities are generally short-term in duration but may still cause adverse air quality impacts. The project would generate emissions from construction equipment exhaust, worker travel, and fugitive dust. These construction emissions include criteria air pollutants from the operation of heavy construction equipment. As provided in the discussion under Impact 3b, the project's construction emissions would not exceed any significance threshold adopted for this project after application of mitigation. Therefore, the project would have a less than significant cumulative impact during construction.

Operational Emissions

Operational pollutants of concern include ROG, NO_X, CO, and particulate matter (PM_{10} and $PM_{2.5}$). As provided in the discussion under Impact 3b, the project's operational emissions would not exceed any significance threshold adopted for this project. Therefore, project operations would have a less than significant cumulative impact.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact with mitigation incorporated. A sensitive receptor is defined by the BAAQMD as the following: "Facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals, and residential areas." The site is surrounded by residential land uses to the west and north and by a school on the east.

The following four criteria were applied to determine the significance of project emissions to sensitive receptors:

- **Criterion 1:** Construction of the project would not result in an exceedance of the health risk significance thresholds.
- **Criterion 2:** Operation of the project would not result in an exceedance of the health risk significance thresholds.
- **Criterion 3:** The cumulative impact would not result in an exceedance of the cumulative health risk significance thresholds.
- **Criterion 4:** A CO hotspot assessment must demonstrate that the project would not result in the development of a CO hotspot that would cause an exceedance of the CO ambient air quality standards.

Criterion 1: Project Construction Toxic Air Pollutants

Diesel particulate matter (DPM) has been identified by the California Air Resources Board as a carcinogenic substance. Major sources of DPM include off-road construction equipment and heavy-

duty delivery truck and worker activities. For purposes of this analysis, DPM is represented as exhaust emissions of $PM_{2.5}$.

Estimation of Construction DPM Emissions

Construction DPM emissions (as $PM_{2.5}$ exhaust) were estimated using CalEEMod, as discussed above. Construction was assumed to occur simultaneously for both sections and last for 20 months. The construction DPM emissions were assumed to be distributed over the project area affected by each construction phase with a working schedule of 8 hours per day and 5 days per week.

Construction exhaust emissions of DPM were estimated using CalEEMod (version 2016.3.2), as shown in Table 10.

Table 10: Project DPM Construction Emissions—No Mitigation

Year	Annual Average On-site DPM (grams/m^2-sec)	Annual Average Off-site DPM from Hwy 101 along Johnson St. and Bell Rd to Project (grams/sec)
Annual Construction Emissions (No Mitigation)		
4/2019 to 12/2019	2.58E-07	6.96E-05
01/2020 to 11/2020	1.63E-07	5.12E-05
Annual Construction Emissions (Tier IV Mitigation)		
4/2019 to 12/2019	2.23E-08	6.96E-05
01/2020 to 11/2020	1.93E-08	5.12E-05
Source: CalEEMod and FirstCarbon Solutions (see Appendix A).		

Estimation of Cancer Risks

The BAAQMD has developed a set of guidelines for estimating cancer risks that provide adjustment factors that emphasize the increased sensitivities and susceptibility of young children to exposures to toxic air contaminants (TACs) (BAAQMD 2016). These adjustment factors include age-sensitivity weighting factors, age-specific daily breathing rates, and age-specific time-at-home factors. The recommended method for the estimation of cancer risk is shown in the equations below with the cancer risk adjustment factors provided in Table 11 for several types of sensitive/residential receptors (infant, child, and adult).

$$\text{Cancer Risk} = C_{DPM} \times \text{Inhalation Exposure Factor} \quad \text{(EQ-1)}$$

Where:

Cancer Risk = Total individual excess cancer risk defined as the cancer risk a hypothetical individual faces if exposed to carcinogenic emissions from a particular source for specified exposure durations; this risk is defined as an excess risk because it is above and beyond the background cancer risk to the population; cancer risk is expressed in terms of risk per million exposed individuals.

C_{DPM} = Period average DPM air concentration calculated from the air dispersion model in µg/m^3

Inhalation is the most important exposure pathway to impact human health from DPM and the inhalation exposure factor is defined as follows:

Inhalation Exposure Factor = CPF x EF x ED x DBR x AAF/AT (EQ-2)

Where:

CPF = Inhalation cancer potency factor for the TAC: 1.1 (mg/kg-day)-1 for DPM
EF = Exposure frequency (days/year)
ED = Exposure duration (years of construction)
AAF = set of age-specific adjustment factors that include age sensitivity factors (ASF), daily breathing rates (DBR), and time at home factors (TAH)—see Table 11.
AT = Averaging time period over which exposure is averaged (days)

The California Office of Environmental Health Hazards Assessment (OEHHA) recommended values for the various cancer risk parameters, shown in EQ 2, above, are provided in Table 11.

Table 11: Exposure Assumptions for Cancer Risk

Receptor Type	Exposure Frequency		Construction Exposure Duration (years)[2]	Age Sensitivity Factors	Time at Home Factor (%)	Daily Breathing Rate[1] (l/kg-day)
	Hours/day	Days/year				
Sensitive/Residential—Infant						
3rd Trimester	24	350	0.25	10	85	361
0–2 years	24	350	1	10	85	1,090
Sensitive Receptor—Child						
3–16 years	24	350	1	3	72	572
Sensitive Receptor—Adult						
> 16 to 30 years	24	350	1	1	73	261

Notes:
(1) The daily breathing rates recommended by the BAAQMD for sensitive/residential receptors assume the 95th percentile breathing rates for all individuals less than 2 years of age and 80th percentile breathing rates for all older individuals.
(2) The exposure duration is 1 year corresponding to the duration of construction.
(l/kg-day) = liters per kilogram body weight per day
Source: BAAQMD 2016. Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines. Website: http://www.baaqmd.gov/~/media/files/planning-and-research/rules-and-regs/workshops/2016/reg-2-5/hra-guidelines_clean_jan_2016-pdf.pdf?la=en.

Estimation of Non-Cancer Chronic Hazards

An evaluation of the potential non-cancer effects of chronic chemical exposures was also conducted. Adverse health effects are evaluated by comparing the annual receptor concentration of each

chemical compound with the appropriate reference exposure level (REL). Available RELs promulgated by the OEHHA were considered in the assessment.

Risk characterization for non-cancer health hazards from TACs is expressed as a hazard index (HI). The HI is a ratio of the predicted concentration of the project's emissions to a concentration considered acceptable to public health professionals, termed the REL.

To quantify non-carcinogenic impacts, the hazard index approach was used.

$$HI = C_{ann}/REL \quad \text{(EQ-3)}$$

Where:

HI = chronic hazard index
C_{ann} = annual average concentration of TAC as derived from the air dispersion model ($\mu g/m^3$)
REL = reference exposure level above which a significant impact is assumed to occur ($\mu g/m^3$)

The HI assumes that chronic exposures to TACs adversely affect a specific organ or organ system (toxicological endpoint) of the body. For each discrete chemical exposure, target organs presented in regulatory guidance were used. To calculate the HI, each chemical concentration or dose is divided by the appropriate toxicity REL. For compounds affecting the same toxicological endpoint, this ratio is summed. Where the total equals or exceeds 1, a health hazard is presumed to exist. For purposes of this assessment, the TAC of concern is DPM, for which the OEHHA has defined a REL for DPM of 5 $\mu g/m^3$. The principal toxicological endpoint assumed in this assessment was through inhalation.

The estimated health and hazard impacts at the maximum impacted sensitive receptor (MIR) from the project's construction emissions are provided in Table 12.

Table 12: Estimated Health Risks and Hazards during Construction—Unmitigated

Health Impact Metric	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index(2)	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Risks and Hazards at the MIR: Infant(1)	**39**	0.03	0.2
Risks and Hazards at the MIR: Child(1)	5	0.03	0.2
Risks and Hazards at the MIR: Adult(1)	0.8	0.03	0.2
BAAQMD Significance Threshold	10.0	1.0	0.3
Exceeds Individual Source Threshold?	**Yes**	**No**	**No**

Notes:
1 The MIR is a residence at the corner of Bell Road approximately 135 feet east of the project.
2 Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the REL of 5 $\mu g/m^3$.
Sources: CalEEMod and FirstCarbon Solutions (see Appendix A).

As shown above, the cancer risks for children and adults, non-cancer hazard index and $PM_{2.5}$ impacts for infants, children, and adults at the MIR would not exceed the BAAQMD's recommended thresholds of significance. However, the cancer risks for infants exceed the threshold of significance of cancer risk. Therefore, mitigation measures are required.

Mitigation Measure AIR-2 would require all off-road construction equipment in excess of 50 horsepower used on-site by the developer or contractors is equipped with engines meeting the United States Environmental Protection Agency (EPA) Tier IV Final off-road engine emission standards. This would reduce cancer risks and hazards associated with construction emissions. Table 13 shows the estimated cancer risks and hazard impacts at the MIR from the project's construction emissions with Tier IV Final mitigation.

Table 13: Estimated Health Risks and Hazards during Construction—Tier IV Mitigation

Health Impact Metric	Cancer Risk (risk per million)	Chronic Non-Cancer Hazard Index[(2)]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Risks and Hazards at the MIR: Infant[(1)]	3.9	<0.01	<0.1
Risks and Hazards at the MIR: Child[(1)]	0.5	<0.01	<0.1
Risks and Hazards at the MIR: Adult[(1)]	0.1	<0.01	<0.1
BAAQMD Significance Threshold	10.0	1.0	0.3
Exceeds Individual Source Threshold?	**No**	**No**	**No**

Notes:
1 The MIR is a residence at the corner of Bell Road approximately 135 feet east of the project.
2 Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as $PM_{2.5}$ exhaust) by the REL of 5 $\mu g/m^3$.
Source: CalEEMod and FirstCarbon Solutions; see Appendix A.

As shown above, the cancer risks for infants would not exceed the BAAQMD's threshold of significance. Therefore, with implementation of Mitigation Measure AIR-2, the project's construction emissions would not result in significant health impacts to the sensitive receptors.

Criterion 2: Project-Specific Operation Toxic Air Pollutants

The proposed project includes residential land uses, and there are no on-site TAC emission sources during operation. Because most passenger vehicles are gasoline-combusted, the project would not generate significant amount of DPM emissions during operation. Therefore, the project would not result in significant health impacts on sensitive receptors during operation.

Criterion 3: Cumulative HRA

The BAAQMD recommends assessing the potential cumulative impacts from sources of TACs within 1,000 feet of a project. The cumulative HRA examined the cumulative impacts of the project's construction emissions and sources of TAC emissions within 1,000 feet of the project. As shown above, the MIR from the project was found at a residence at the corner of Bell Road approximately 135 feet east of the project site. Therefore, the cumulative health impacts were estimated at this location.

For project-level analysis, BAAQMD provides three tools for use in screening potential sources of TACs. These tools are:

- **Surface Street Screening Tables.** BAAQMD pre-calculated potential cancer risks and $PM_{2.5}$ concentration increases for each county within their jurisdiction for roadways that meet BAAQMD's "major roadway" criteria of 10,000 vehicles or 1,000 trucks per day. Risks are assessed by roadway volume, roadway direction, and distance to sensitive receptors. There are no major roadways located within the 1,000-foot radius of the project site. The closest roadway with available traffic data is Windsor River Road, which carries approximately 1,291 vehicles per day, and would not be considered a major roadway (County of Sonoma 2018).
- **Freeway Screening Analysis Tool.** BAAQMD prepared a Google Earth file that contains pre-estimated cancer risk, hazard index, and $PM_{2.5}$ concentration increases for highways within the Bay Area. Risks are provided by roadway link and are estimated based on elevation and distance to the sensitive receptor. There are no freeways located within 1,000 feet of the project boundary.
- **Stationary Source Risk and Hazard Screening Tool.** BAAQMD prepared a Google Earth file that contains the locations of all stationary sources within the Bay Area that have BAAQMD permits. For each emissions source, BAAQMD provides conservative cancer risk and $PM_{2.5}$ concentration increase values. There are no stationary sources located within 1,000 feet of the site boundary.

Because the project site is not within 1,000 feet of any major roadways, freeways, or stations sources, there are no existing TAC emission sources located within 1,000 feet of the project. Therefore, the project's construction emissions would not exceed the BAAQMD's cumulative health significance thresholds. As such, impacts would be less than significant.

Criterion 4: CO Hotspot

As discussed under Impact 2b, the operational CO hotspot impact as a result of project operations would be less than significant.

Project as a Receptor

The project is locating new sensitive receptors (residents) that could be subject to existing sources of TACs. However, the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District concluded that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. Therefore, impacts from existing sources of TAC emissions on sensitive receptors on the project site are not subject to CEQA.

e) Create objectionable odors affecting a substantial number of people?

Less than significant impact. As stated in the BAAQMD 2017 Air Quality Guidelines, odors are generally regarded as an annoyance rather than a health hazard and the ability to detect odors varies considerably among the populations and overall is subjective.

The BAAQMD does not have a recommended odor threshold for construction activities. However, BAAQMD recommends screening criteria that are based on distance between types of sources known to generate odor and the receptor. For projects within the screening distances, the BAAQMD has the following threshold for project operations:

> An odor source with five (5) or more confirmed complaints per year averaged over three years is considered to have a significant impact on receptors within the screening distance shown in Table 3-3 [of the BAAQMD's guidance].

The BAAQMD's 2017 Air Quality Guidelines provide a table with odor screening distances recommended by BAAQMD for a variety of land uses. Projects that would site an odor source or a receptor farther than the applicable screening distance, shown in Table 14, would not likely result in a significant odor impact.

Table 14: Odor Screening Distances

Land Use/Type of Operation	Project Screening Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Metal Smelting Plants	2 miles
Source: BAAQMD, 2017.	

Project Construction

Diesel exhaust and volatile organic compounds would be emitted during construction of the project, which are objectionable to some; however, emissions would disperse rapidly from the project site

and therefore would not create objectionable odors affecting a substantial number of people. As such, construction odor impacts would be less than significant.

Project Operation

Land uses typically considered associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The project does not contain land uses typically associated with emitting objectionable odors. During operation of the project, odors would primarily consist of vehicles traveling to the site. These occurrences would not produce significant odors; therefore, operational impacts would be less than significant.

Mitigation Measures

MM AIR-1 The following Best Management Practices (BMPs), as recommended by the BAAQMD, shall be included in the project design and implemented during construction:

a. All active construction areas shall be watered at least two times per day.
b. All exposed non-paved surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and access roads) shall be watered at least three times per day, and/or non-toxic soil stabilizers shall be applied to exposed non-paved surfaces.
c. All haul trucks transporting soil, sand, or other loose material off-site shall be covered and/or shall maintain at least 2 feet of freeboard.
d. 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.
e. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
f. 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.
g. 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 the California Code of Regulations). Clear signage regarding idling restrictions shall be provided for construction workers at all access points.
h. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
i. The prime construction contractor shall post a publicly visible sign with the telephone number and person to contact at the BAAQMD regarding dust complaints. BAAQMD and the construction contractor shall take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

MM AIR-2 During construction activities, all off-road equipment with engines greater than 50 horsepower shall meet either EPA or ARB Tier IV Final off-road emission standards. The construction contractor shall maintain records concerning its efforts to comply with this requirement, including equipment lists. Off-road equipment descriptions and information may include but are not limited to equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, and engine serial number.

If engines that comply with Tier IV Final off-road emission standards are not commercially available, then the construction contractor shall use the next cleanest piece of off-road equipment (e.g., Tier IV Interim) available. For purposes of this mitigation measure, "commercially available" shall mean the availability of Tier IV Final engines taking into consideration factors such as (i) critical-path timing of construction; and (ii) geographic proximity to the project site of equipment. The contractor can maintain records for equipment that is not commercial available by providing letters from at least two rental companies for each piece of off-road equipment where the Tier IV Final engine is not available.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
4. Biological Resources *Would the project:*				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

Environmental Evaluation

This section evaluates potential effects on biological resources that may result from project implementation. The analysis in this section is based on a biological resources assessment, which included a biological assessment and wetland delineation prepared by Dr. Laurence P. Stromberg in November 2014, an Arborist Report prepared by certified arborist John C. Meserve in February 2018, a site visit by FCS biologists on February 9, 2018, and a technical memorandum summarizing Dr. Stromberg's 2014 biological assessment. These studies are provided in their entirety in Appendix B.

Descriptions and analysis in this section are also based on results from the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), the California Native Plant Society (CNPS) Electronic Inventory for the Healdsburg quadrangle within Sonoma County, and the U.S. Fish and Wildlife Service (USFWS) database searches. Appendix B contains the results of these searches.

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less than significant impact with mitigation incorporated. The project site sits on approximately 20.2 acres in the Town of Windsor, Sonoma County, California. The project site is an irregular, roughly triangular-shaped area south of Windsor River Road between the NWPRR right-of-way, which borders the southwest project site boundary, and Windsor Creek, which runs along the northeast side of the site.

Special-status plant and wildlife species typically occur in undeveloped areas. Although it is less likely, it is also possible for them to occur within developed areas. The project site contains characteristics of land that has been developed or disturbed, including disturbed soils, impervious surfaces, and the presence of invasive and non-native plant species. Specifically, the site was previously utilized for industrial and commercial uses including a mill, casting plant, feed store, and winery. Twelve special-status plant and 13 special-status wildlife species were evaluated for their potential to occur on project site, based on their ecology and regional occurrences within the Healdsburg quadrangle. Potential impacts occurring to special-status species, if they were found on-site, would likely be significant.

Special-Status Plant Species

As noted above, 12 special-status plant species (see Appendix B) were evaluated as to their potential to occur on the project site. From the absence of suitable habitat and field surveys conducted by FCS biologists and Dr. Stromberg, it was determined that all 12 special-status plant species are considered unlikely to occur on the project site. Furthermore, no special-status plants were observed on field surveys by FCS biologist or Dr. Stromberg. However, of the 12 special-status plant species considered, four federally listed species—many-flowered navarretia (*Navarretia leucocephala*), Sonoma sunshine (*Blennosperma bakeri*), Sebastopol meadowfoam (*Limnanthes vinculans*), and Burke's goldfields (*Lasthenia burkei*)—have the potential to occur on-site, although unlikely, based on the marginal wetland habitat present.

Special-status plant surveys have been conducted by Monk & Associates on the project site between March and June in 2003 and 2004. Dr. Stromberg conducted additional plant surveys on March 14, March 29, April 17, and May 15, 2013, and April 16, April and May 20, 2014. The results for all surveys were negative. However, for purposes of a conservative analysis, it is presumed that populations of federally listed species still might occur on-site, and impacts to these species would be considered significant. Furthermore, the project site is located within the Santa Rosa Plain

Conservation Strategy (SRPCS) area and is designated as an area where activities "may adversely affect listed plants." Therefore, implementation of Mitigation Measure BIO-1 to avoid, minimize, and/or compensate for impacts from project-related disturbance to, or loss of special-status plant populations, is recommended. Implementation of Mitigation Measure BIO-1 would reduce project impacts to any special-status plant species that may occur on the site to a less than significant level.

Special-Status Wildlife Species

As noted above, 13 special-status wildlife species (see Appendix B) were evaluated as to their potential to occur on project site. Because of the project site has been heavily disturbed through past industrial and commercial uses, coupled with an adjacent fragmented habitat, no special-status wildlife species are expected to occur within the project site. However, the project requires the removal of 68 trees that may provide potential habitat for special-status bird species, such as the white-tailed kite (*Elanus leucurus*), as well as non-special-status migratory raptors and passerine bird species protected by the Migratory Bird Treaty Act (MBTA).

Construction activities could disturb nesting and breeding birds in trees within and around the project site. Potential impacts on special-status and migratory birds that could result from the construction and operation of the project include the destruction of eggs or occupied nests, mortality of young, and the abandonment of nests with eggs or young birds prior to fledging. If these species were found to be present, impacts to these species would be significant. Mitigation Measure BIO-2 would reduce impacts on migratory and nesting raptors protected under the MBTA to a less than significant level.

As stated above, the project site is located within the SRPCS, which aims to contribute to the recovery of the listed California tiger salamander (CTS) (*Ambystoma tigrinum californiense*). Although the project site is within the SRPCS, it lies outside the limits of CTS critical habitat and 5.17 miles from the nearest known CTS breeding pond locations. According to Dr. Stromberg's Biological Assessment, Monk and Associates submitted a CTS site assessment report to the USFWS in 2004, which concluded that no suitable breeding habitat or upland refuge habitat is present on the project site. Furthermore, Section 5.3.3.3 of the SRPCS states:

> Impact to CTS is not likely on some lands beyond 1.3 miles from breeding sites, or on lands within 1.3 miles from breeding sites that are surrounded by significant barriers or are otherwise unsuitable CTS habitat. Neither surveys nor mitigation would be required for projects on these properties. No CTS mitigation or surveys will be required for projects outside of the potential CTS range.

As such, impacts to the listed CTS as a result of project construction would be considered less than significant.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Less than significant impact with mitigation incorporated. The project proposes impacts to Windsor Creek in the form of a bridge and pedestrian crossing on the southern portion of the site. Windsor Creek is a tributary to Mark West Creek, which is a tributary of the Russian River, a traditional navigable water. In addition, Windsor Creek depicts an ordinary high water, making it part of "waters of the United States."

Riparian Habitat

Sensitive habitats include those that are of special concern to resource agencies and those that are protected under CEQA, specifically Section 1600 of the California Fish and Game Code. Riparian habitats are considered sensitive natural communities under CEQA. The riparian habitat associated with Windsor Creek, which borders the site to the east, is considered a sensitive community. As noted above, likely jurisdictional waters of the United States occur on Windsor creek. If development results in impacts to the on-site aquatic resources below the ordinary high water mark (OHWM), applications for Section 401 and 404 permits shall be submitted to the Regional Water Quality Control Board (RWQCB) and the U.S. Army Corps of Engineers (USACE) respectively, as required by Mitigation Measure BIO-3. In addition, a Lake and Streambed Alteration Agreement shall be drafted and submitted to the CDFW, also as required by Mitigation Measure BIO-3.

Currently, the engineering design has not indicated whether aquatic resources will be impacted below the OHWM. However, construction of a bridge and pedestrian crossing will result in localized loss of vegetation, general disturbance to the soil, and an increase in impervious surfaces. Furthermore, removal of vegetation and soil could accelerate erosion processes within the project site and increase the potential for sediment to enter the creeks, which have the potential to contain special-status species. These impacts would be potentially significant.

The proposed project would also be developed in a manner consistent with the Town of Windsor's Zoning Ordinance Section 27.20.040—Creekside Development; which requires buildings are setback outward a distance of 2.5 times the height of the stream bank plus 30 feet, or 30 feet outward from the stream bank, whichever distance is greater. In addition, implementation of Mitigation Measures BIO-3 and BIO-4, along with compliance with the associated permits would reduce impacts from erosion, sedimentation, runoff, and accidental spills, as well as impacts to riparian habitat, to a less than significant level.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than significant impact with mitigation incorporated. The project site contains five small seasonal wetland features that were identified by Dr. Stromberg and verified by FCS biologists. The five on-site wetlands have had their habitat values and functions reduced through urban development and past disturbance events. The proposed project intends to fill all five seasonal

wetlands, affecting a total of 0.07 acre of wetland habitat. This could result in significant impacts if no mitigation is incorporated. Implementation of Mitigation Measure BIO-3 would reduce impacts on wetland habitat to a less than significant level.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?

Less than significant impact with mitigation incorporated. The project site contains disturbed land, and the surrounding area consists of light commercial use, and residential developments. Special status plant and wildlife species have been determined unlikely to be found on the project site. However, Windsor Creek may support the movement of special-status species. Compliance with the federal and state regulations related to the protection of migratory species along with the proposed General Plan policies that protect biological resources (ER 6.1–6.12) would reduce impacts. Mitigation Measure BIO-2 would reduce impacts to these species to less than significant levels.

As noted under Impact 4a, the project may have adverse effects on nesting birds and raptors, including special-status birds and species protected under the MBTA. Impacts to these species would be potentially significant. Implementation of Mitigation Measure BIO-2 would reduce these impacts to less than significant levels.

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

Less than significant impact. An arborist conducted a survey of trees on the project site. The arborist's report is available in Appendix B of this IS/MND. Of the 155 trees surveyed on the site, the proposed project would remove a total of 68 trees. Of these, 64 would require removal because of anticipated impacts from project construction, and the remaining four are recommended for removal because of their existing poor condition.

The Town's 2007 Tree Preservation and Protection Ordinance (Zoning Ordinance Section 27.36.040) regulates protection, preservation, maintenance, and removal of protected trees, including native oak trees measuring six inches or greater, California Buckeye trees measuring six inches or greater, and California Bay trees measuring 12 inches or greater. Of the 68 trees to be removed as part of project construction, 58 qualify as protected trees. As such, the project shall be required to obtain a tree removal permit from the Town and either replace the trees that are to be removed or pay an in-lieu fee, unless the trees are documented as being "hazardous." The proposed project would adhere to the Town's Tree Ordinance for the removal of other trees, including obtaining appropriate tree removal permits, and ensuring protection of maintained trees. This would ensure that impacts to protected trees would be minimized and that no conflicts with the Town's tree ordinance would occur. As such, impacts would be less than significant.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less than significant impact with mitigation incorporated. The project site is located within the SRPCS, a conservation program put in place by the USFWS to mitigate adverse effects on listed species from development on the Santa Rosa Plain. As noted above, four listed plant species have the potential to occur on the project site. A rare plant survey shall be conducted for the listed species with the potential to occur on the project site. If listed plants are found during the blooming period then during the federal Clean Water Act permitting process, the USACE is likely to initiate consultation with the USFWS for an opinion on these species that will likely involve a preservation component for the overall project site. For this reason, implementation of Mitigation Measure BIO-1 requires implementation of compensatory mitigation, as approved by USFWS, for protection of potential existing listed plants. As such, the proposed project would not conflict with the provisions of the SRPCS, and impacts would be less than significant with mitigation.

Mitigation Measures

MM BIO-1 Prior to site grading, properly timed, focused rare plant surveys shall be conducted by a qualified botanist in all suitable habitats (primarily wetlands) that are to be disturbed. To effectively survey for the following four species as needed to identify absence/presence during their blooming season, a minimum of three surveys shall be conducted: many-flowered navarretia (*Navarretia leucocephala* ssp.), Sonoma sunshine (*Blennosperma bakeri*), Sebastopol meadowfoam (*Limnanthes vinculans*), and Burke's goldfields (*Lasthenia burkei*). The actual timing and number of surveys may be modified if local reference populations can be checked to establish when the target species are actually blooming and, therefore, identifiable in the field. Survey guidelines developed by the CNPS shall be employed for all surveys conducted for special-status plant species. If no populations of these plants species are detected during focused rare plant surveys, then no additional mitigation is warranted.

Any populations of special-status plant detected within the development envelope and identified as potentially subject to disturbance shall be mapped, and the project shall avoid disturbance to those populations, if feasible.

If the special-status plant species are detected and cannot be avoided, then a formal consultation with the USFWS shall be initiated under Section 7 of the ESA, as appropriate. No direct or indirect impacts to suitable habitat for these species shall occur until Incidental Take authorization has been obtained from the USFWS.

Based on the results of formal consultation with the USFWS, species appropriate habitat preservation and/or creation credits shall be dedicated within a USFWS-approved ecosystem preservation bank. With USFWS approval, appropriate payment into an in-lieu fee fund or on-site preservation may be used to satisfy this measure.

MM BIO-2 If construction or tree removal is proposed during the breeding/nesting season for local avian species (typically March 1 through August 31), a focused survey for active nests of raptors and migratory birds within and in the vicinity of (no less than 250 feet outside the project boundaries, where possible) the project site shall be conducted by a qualified biologist. One survey will be conducted 30 days prior to tree removal or construction activities. If no active nests are found, then tree removal or construction activities may proceed.

If an active nest is located during pre-construction surveys, the United States Fish and Wildlife Service and/or the California Department of Fish and Wildlife (as appropriate) shall be notified regarding the status of the nest. Furthermore, construction activities shall be restricted to avoid disturbance of the nest until it is abandoned or the biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones or alteration of the construction schedule.

MM BIO-3 The Applicant shall obtain a Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers for impacts to wetlands and possible waters of the United States. The Applicant shall also obtain a Clean Water Act Section 401 permit from the Regional Water Quality Control Board. These permits shall be obtained prior to issuance of grading permits and implementation of the proposed project.

The Applicant shall ensure that the project will result in no net loss of waters of the U.S. by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact, as determined in the Clean Water Act Section 404/401 permits. Compensatory mitigation may consist of (1) obtaining credits from a mitigation bank; (2) making a payment to an in-lieu fee program that will conduct wetland, stream, or other aquatic resource restoration, creation, enhancement, or preservation activities; and/or (3) providing compensatory mitigation through an aquatic resource restoration, establishment, enhancement, and/or preservation activity. This final type of compensatory mitigation may be provided at or adjacent to the impact site (i.e., on-site mitigation) or at another location, usually within the same watershed as the permitted impact (i.e., off-site mitigation). The Project/Permit Applicant retains responsibility for the implementation and success of the mitigation project. Evidence of compliance with this mitigation measure shall be provided prior to construction and grading activities for the proposed project.

MM BIO-4 To protect the long-term habitat of Windsor Creek, the Applicant shall ensure that the creek is not obstructed and human intrusion into the riparian area is minimized. In compliance with Section 1600 of the California Fish and Game Code, the Applicant shall enter into a Lake and Streambed Alteration Agreement prior to conducting any construction activities within the creek corridor (defined by the California Department of Fish and Wildlife as the top of bank plus the outer edge of the dripline of riparian vegetation) which will identify conditions the Applicant will implement. As a condition of the Lake and Streambed Alteration Agreement, the

following mitigation measure shall be implemented to compensate for the removal of riparian habitat:

1. Riparian habitat shall be created at not less than a 1:1 ratio in an area within reasonable proximity to the project site, and a Riparian Restoration and Monitoring Plan shall be established.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
5. Cultural and Tribal Cultural Resources *Would the project:*				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
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:				
e) 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	☐	☒	☐	☐
f) 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.	☐	☒	☐	☐

Environmental Evaluation

The analysis of project impacts on cultural resources and tribal cultural resources is based primarily on a Cultural Resource Assessment by FCS. Appendix C contains the Cultural Resource Assessment. The assessment involved a records search at the Northwest Information Center (NWIC) at Sonoma State University, additional research of Sonoma County and City of Santa Rosa records, a Sacred Lands file search by the Native American Heritage Commission (NAHC), and a pedestrian survey of the project site.

Cultural Resources

Would the project:

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

Less than significant impact. The area now known as the Town of Windsor was first settled in 1851. In 1855 Hiram Lewis, a Pony Express rider for the County, named the community "Windsor," presumably because the area's pastoral beauty reminded him of the grounds surrounding Windsor Castle in his native England. Lewis stayed to become Windsor's first acting postmaster, establishing a Windsor Post Office on August 31, 1855. East Windsor was the center of all business enterprise, but when the railroad came to Windsor in 1872, the town started to move from east to west, closer to the rail line. The railroad enabled farmers to begin extensive fruit production because they were able to transport products to ready markets quicker.

In the first decade of the 1900s, Windsor got its first telephone system. Cloverdale Electric Light and Power Company provided electricity to businesses and residences in late 1911. In 1915, the Old Redwood Highway was paved by horse teams, and workers camped in Windsor. During World War II, a United States Army airbase was built south of Windsor, which is now the modern-day Sonoma County Airport. Through most of the 1900s, Windsor was primarily agricultural, with grapes, hops, and prunes as the main crops. Housing development blossomed in the early 1980s, bringing new families and businesses into the area and leading to rapid population and economic growth. On July 1, 1992, Windsor was incorporated as a town in Sonoma County.

FCS conducted a records search at the NWIC for the project site and a 0.5-mile radius beyond its boundaries. Table 15 shows the results of the records search, which indicate that 14 known cultural resources have been recorded within the 0.5-mile search radius surrounding the project site. None of these resources is located within the project site.

Table 15: Cultural Resources within 0.5-Mile of the Project Site

Resource No.	Resource Description	Date Recorded
P-49-001353	**CA-SON-001450H: L.A. 1** AH03 (Landscaping/orchard); AH15 (Standing structures)	1984
P-49-002741	**ASC-1** HP19 (Bridge)	1999
P-49-002834	**CA-SON-002322H: Northwestern Pacific Railroad** AH02 (Foundations/structure pads); AH04 (Privies/dumps/trash scatters); AH07 (Roads/trails/railroad grades); AH15 (Standing structures); HP11 (Engineering structure); HP17 (Railroad depot); HP19 (Bridge); HP39 (Other)	—
P-49-002835	**8606 Windsor Road** HP02 (Single family property)	2010

Table 15 (cont.): Cultural Resources within 0.5-Mile of the Project Site

Resource No.	Resource Description	Date Recorded
P-49-002836	**8290 Windsor Road** HP02 (Single family property)	2010
P-49-002837	**8234 Windsor Road** HP02 (Single family property)	1979
P-49-002838	**8580 & 8570 Windsor Road** HP02 (Single family property)	2010
P-49-003181	**Smart-Moose House** HP02 (Single family property); HP33 (Farm/ranch)	2004
P-49-003182	**McPeak-Grove House** HP02 (Single family property); HP33 (Farm/ranch)	2003
P-49-003544	**Map Reference #11** HP02 (Single family property)	2003
P-49-003545	**Map Reference #12** HP02 (Single family property)	2003
P-49-003811	**206050-01 Prepared flat and utility pole** AH02; AH16	2008
P-49-003812	**Windsor River Road** AH11 (Walls and fences); AH15 (Standing structures); HP16(Religious building)	2007
P-49-003813	**Windsor Masonic Lodge** HP06 (1–3 story commercial building); HP45 (Unreinforced masonry building)	2008
Source: NWIC Records Search, January 24, 2018.		

The records searches did not reveal any historic structures within a 0.5-mile radius of the project site for the county, state, or national inventories. Project impacts on historical resources would be considered less than significant.

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

Less than significant impact with mitigation incorporated. The results of the NWIC records search indicated that two recorded lithic scatters are located within the southern portion of the project site. The FCS field survey examined all areas of the exposed ground surface for prehistoric artifacts, soil discoloration, and depressions that might indicate the presence of a cultural midden, or faunal and human osteological remains. Particular attention was paid to areas in proximity of the northern and southern creeks, including the two previously recorded lithic scatters. No additional prehistoric cultural resources or raw materials commonly used in the manufacture of tools were found at either previously recorded site, nor were any identified within the project site as a whole.

While unlikely, it is possible that earthmoving activities associated with project construction could encounter previously undiscovered archaeological resources. Disturbance of these undiscovered resources would be a potentially significant impact. Mitigation Measure CUL-1 would establish procedures for the inadvertent discovery of cultural resources on the project and would require a qualified archaeologist and/or Native American monitor be present during the initial phase of ground disturbance in order to check for the inadvertent exposure of cultural materials. Implementation of Mitigation Measure CUL-1 would reduce impacts on undiscovered cultural resources to a less than significant level.

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

Less than significant impact with mitigation incorporated. Consulting paleontologist Dr. Ken Finger performed a records search on the University of California Museum of Paleontology database for the project site. A copy of Dr. Finger's report is available in Appendix C of this IS/MND. The database currently lists 88,076 vertebrate fossils from 1,233 localities in California. Twelve of the specimens were collected from 10 localities in Sonoma County, none of which are within 8 miles of the project site.

Fossil deposits in alluvium are spottily distributed and usually unpredictable; however, the great abundance of vertebrate fossils collected from Pleistocene alluvium is cause to consider all of it as highly sensitive prior to its disturbance. The northern part of the proposed project site is situated on Pleistocene deposits, which likely extend southward, below the Quaternary alluvium (Qal); hence, there is a potential of encountering Pleistocene vertebrates anywhere within the confines of the site.

As with archaeological resources, it is possible that construction activities associated with the project could encounter previously undiscovered paleontological resources. Damage or destruction of these resources would be a potentially significant impact. Implementation of Mitigation Measure CUL-2 would establish a procedure for handling paleontological resources that may be discovered during project construction. This mitigation would reduce impacts associated with paleontological resources to a less than significant level.

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

Less than significant impact with mitigation incorporated. No human remains or cemeteries are known to exist within or near the project site. Although human remains within the project site are unlikely, there is always the possibility that construction activities associated with the project could potentially damage or destroy previously undiscovered human remains. This would be a potentially significant impact.

In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5, Health and Safety Code Section 7050.5, and Public Resources Code Sections 5097.94 and 5097.98 must be followed. Mitigation Measure CUL-3 further specifies the procedures to follow in the event human remains are uncovered. Along with compliance with these guidelines and statutes, implementation of this mitigation would reduce potential impacts related to human remains to a less than significant level.

Tribal Cultural Resources

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:

e) 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)?

Less than significant impact with mitigation incorporated. The project site lies at the intersection of lands that were controlled by two separate ethnographic groups at the time of European contact: the Western Wappo and Southern Pomo. The project site lies within the Southern Pomo sphere of influence; however, each group may have had shared access to the region at different points in time. The traditional territory of the Southern Pomo lay in what is today Sonoma County, beginning approximately 5 miles south of Santa Rosa and extending northward for 40 miles.

As described under Impact 5b, a search of records revealed only two lithic scatter sites recorded on the project site. A subsequent pedestrian survey did not find additional prehistoric cultural resources or raw materials commonly used in the manufacture of tools at either of the previously recorded site, nor were any identified within the project site as a whole. However, while unlikely, it is possible that earthmoving activities associated with project construction could encounter previously undiscovered archaeological resources, including tribal resources. Implementation of Mitigation Measure CUL-1 would reduce impacts on undiscovered cultural resources, including those of value to Tribes, to a less than significant level.

f) 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.

Less than significant impact with mitigation incorporated. FCS sent a letter to the NAHC in an effort to determine whether any sacred sites or tribal cultural resources were listed for the project site on its Sacred Lands File. A response was received on February 6, 2018 indicating that the results from the Sacred Lands File search were negative; however, the letter stated that the absence of specific site information did not negate the possibility that tribal cultural resources may be present within the project site and recommended consultation with local tribal representatives. To this end, the NAHC included a list of eight tribal representatives available for consultation. To ensure the protection of potential tribal cultural resources and address potential concerns about the project, a letter containing project information and a request for any additional information was sent to all eight tribal representatives on February 12, 2018. No response has been received to date.

As noted under Impact 5e, no prehistoric cultural resources were identified within the project site as a whole, but undiscovered cultural resources may exist within the project site boundaries. Implementation of Mitigation Measure CUL-1 would reduce impacts on undiscovered cultural

resources, including those of value to Tribes. In addition, implementation of Mitigation Measure CUL-3 would mitigate impacts on human remains that could be uncovered during project construction, including remains that may be Native American in origin. Implementation of these mitigation measures would reduce impacts to a less than significant level.

Mitigation Measures

MM CUL-1 In the event that buried cultural resources are discovered during construction, operations shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. Any previously undiscovered resources found during construction on the project site shall be recorded on appropriate California Department of Parks and Recreation forms and evaluated for significance in terms of CEQA criteria.

The qualified archeologist shall make recommendations to the Lead Agency on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section15064.5 of the CEQA Guidelines. If the resources are determined to be unique historic resources as defined under Section 15064.5 of the CEQA Guidelines, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any archaeological artifacts recovered as a result of mitigation shall be donated to a qualified scientific institution approved by the Lead Agency where they would be afforded long-term preservation to allow future scientific study.

MM CUL-2 Given the high potential of encountering Pleistocene vertebrates anywhere within the confines of the project site, a qualified paleontological monitor shall be present during the initial phase of ground disturbance (i.e., grading and other site preparation) in order to check for the inadvertent exposure of paleontological resources. This may be followed by regular periodic or "spot-check" archaeological monitoring during ground disturbance as needed. Should any vertebrate remains be encountered, all construction-related activities shall be diverted from the find until a professional paleontologist has properly recorded and evaluated and, if deemed appropriate, salvaged them in a timely manner. Recovered fossils shall be deposited in an appropriate repository, such as the University of California Museum of Paleontology, where they will be properly curated and available for scientific research and education.

MM CUL-3 In the event of the accidental discovery or recognition of any human remains, California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98 shall be followed. If during the course of project development

there is accidental discovery or recognition of any human remains, the following steps shall be taken:

1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the "most likely descendant" of the deceased Native American. The most likely descendant may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98, or
2. Where the following conditions occur:
   - The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being notified by the commission;
   - The descendant identified fails to make a recommendation; or
   - The landowner or his authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.

   Then the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the MLD or on the project site in a location not subject to further subsurface disturbance.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
6. Geology and Soils *Would the project:*				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

Environmental Evaluation

The analysis in this section is based in part on a Geotechnical Investigation Report prepared by Kleinfelder, Inc. in 2004[3]. This report is provided in Appendix D of this IS/MND.

[3] The project site conditions have not materially changed since the preparation of the report.

Would the project:

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

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than significant impact. Review of geologic maps of the site and vicinity do not indicate the presence of active faults at the project site. The nearest active fault zone is the Healdsburg/Rogers Creek Fault, located approximately 1.8 miles northeast of the project site. Strong shaking can be expected from other faults in the region such as the Maacama fault, located approximately 6.2 northeast of the site. The project site is not located within a state-mandated Earthquake Fault Zone as defined by the California Geological Survey (CSG), in accordance with the Alquist-Priolo Earthquake Fault Zone Act. There is a little risk of fault-related ground rupture at the site during earthquakes; therefore, rupture impacts are considered less than significant.

ii) Strong seismic ground shaking?

Less than significant impact with mitigation incorporated. All of California, including the project site, is subject to earthquake risks. The project site area is situated within Northern California, a region characterized by a number of active faults and fault zones, and moderate to high seismic activity. The future seismic events in this region can be expected to produce strong seismic ground shaking at this site.

Geotechnical and seismic design criteria must conform to engineering recommendations in accordance with the seismic requirements of Zone 4 of the Uniform Building Code (UBC) and California Building Code (Title 24) additions. An Ordinance of the Town of Windsor adopted the use of Title 24, which provides regulation to ensure performance of a building in earthquake scenarios. The project would be required to comply with all applicable building code regulations and standards to address potential geologic impacts associated with proposed redevelopment of the site including ground shaking. Conformance with regulations and standards would reduce seismic ground shaking impacts to less than significant levels. Furthermore, implementation of Mitigation Measure GEO-1, which requires the project applicant follow the Geotechnical Investigation Report's recommendations, would reduce the impact of seismic shaking to less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less than significant impact with mitigation incorporated. Liquefaction can occur in loose, cohesionless silt and sand where groundwater is shallow. Data from borings indicate that the site is predominantly underlain by stiff clays and weathered Glen Ellen bedrock deposits. Therefore, liquefaction potential at the project site is considered low. It is possible that there may be isolated, thin zones of loose, cohesionless silt or land within the near-surface and possible within the bedrock deposits that were not detected. However, silt/clay content of most of the natural surface and

subsurface soils and surface confinement, provided by the implementation of Mitigation Measure GEO-1 would reduce the impact of seismic-related ground failure, including liquefaction, to less than significant.

iv) Landslides?

No impact. The project site is a relatively flat parcel of land with little difference in elevation. The site is surrounded by land that is similarly level. No landslide risk or impact would occur.

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

Less than significant impact. Project construction would include clearing, grading, excavation, and other earthmoving activities. These activities would expose surface soils to wind and precipitation, which could lead to soil erosion.

The Windsor Municipal Code contains requirements for new development and redevelopment projects to minimize pollutants in stormwater runoff. These requirements include BMPs—such as erosion control, revegetation, stream setbacks, and parking lot cleaning—that are detailed in the Town's Phase II NPDES [National Pollutant Discharge Elimination System] Storm Water Management Plan. The Town of Windsor Municipal Code Title IX, Chapter 4 includes stormwater discharge requirements designed to achieve compliance with the North Coast RWQCB's NPDES permit and Waste Discharge Requirements for MS4 Discharges (Order No. R1-2015-0030; NPDES No. CA0025054). Discharges to the Town's stormwater 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 North Coast RWQCB.

Additionally, projects that disturb 1 or more acres of soil are required to obtain the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit), issued by the State Water Resources Control Board (SWRCB). The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must list BMPs the project will implement to control erosion and prevent the conveyance of sediments off-site. Implementation of the conditions of the Construction General Permit would reduce erosion impacts resulting from project construction to less than significant levels.

Once construction work is completed, the impervious surfaces and landscaping would minimize potential erosion risks.

Overall, compliance with the applicable provisions of the Construction General Permit, the Town of Windsor's Municipal Code would ensure that impacts would be less than significant.

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

Less than significant impact with mitigation incorporated. The United States Department of Agriculture—Natural Resources Conservation Service identifies the project site as consisting of

approximately 66 percent Huichica loam with zero to two percent slopes (HtA), 23.2 percent Huichica loam shallow with zero to nine percent slopes (HvC) and 1.5 percent Riverwash soil (RnA). The site is underlain by undifferentiated alluvium consisting of sand, gravel, silt, and clay (Kleinfelder, 2004).

Mitigation Measure GEO-1 includes suitable support of foundations, concrete-on-grade and pavements, along with related grading and site preparation. With the implementation of Mitigation Measure GEO-1 and adherence to the UBC and California Building Code, the impacts of related to unstable soils would be rendered less than significant.

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

Less than significant impact with mitigation incorporated. Soils that are considered expansive contain significant amount of clay materials. Expansive soils are characterized by their ability to undergo significant volume change because of variations in moisture content. Clayey soils should be properly moisture-conditioned and compacted to reduce the shrink-swell behavior, coupled with appropriate foundation design. Soils can be replaced with low-expansion select fill and can be placed beneath the structures, concrete slabs-on-grade, and pavements.

Clayey, near-surface soils are located across the site and are moderately expansive. The surface and near surface soils have a moderate potential for expansion. With the implementation of Mitigation Measure GEO-1 and adherence to the UBC and California Building Code, the impacts of the project related to expansive soils would be less than significant.

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

No impact. The project proposes connection to the sanitary sewer system for disposal of wastewater. It would not rely upon septic tanks, leach fields, or alternative wastewater disposal systems. The project would have no impact related to soils capability to support wastewater disposal.

Mitigation Measures

MM GEO-1 Prior to the issuance of a grading or building permit and during the foundation phases of construction, the project applicant shall demonstrate to the Town of Windsor that all applicable recommendations from a design-level geotechnical report have been incorporated into the project plans.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
7. Greenhouse Gas Emissions *Would the project:*				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Environmental Evaluation

The following analysis of greenhouse gas (GHG) emissions is based in part on CalEEMod modeling conducted by FCS. The modeling is included in Appendix A of this IS/MND.

Would the project:

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

Less than significant Impact. The project is located in the Town of Windsor, in the portion of Sonoma County regulated by the BAAQMD. BAAQMD's project-level significance threshold for operational GHG generation was deemed appropriate to use when determining the project's potential GHG impacts. The thresholds suggested by BAAQMD for project-level operational GHG generation are as follows:

- Compliance with a qualified GHG Reduction Strategy, or
- 1,100 metric tons carbon dioxide equivalent per year (MT CO_2e/year), or
- 4.6 metric tons CO_2e/service population (residents + employees)/year.

The estimated annual emissions for the project were compared with the 4.6 MT CO_2e/service population/year threshold to determine significance for this criterion.

Project Construction

The project would generate GHG emissions during construction activities such as site grading, on-site heavy-duty construction vehicle use, vehicles hauling materials to and from the project site, and construction worker trips. Construction of the project was assumed to begin in April 2019 and conclude in November 2020. Construction assumptions are consistent with those used to estimate air pollutant emissions, as described under Impact 3b. The detailed construction schedule and other modeling assumptions can be reviewed in the modeling results included in Appendix A of this report. These emissions are considered temporary or short-term.

The BAAQMD does not have a recommended screening level or a threshold of significance for construction-related GHG emissions; however, the BAAQMD does recommend that lead agencies quantify and disclose construction-related GHG emissions. Therefore, additional analysis quantifying and disclosing construction-related GHG emissions was completed.

GHGs would be emitted from construction equipment, and worker and vendor vehicle trips associated with the development of the proposed project. Total GHG emissions generated during all phases of construction were estimated using CalEEMod version 2016.3.2 and are presented below in Table 16. If the construction dates move out to later years, emissions are expected to decrease because of turnover for newer cleaner off-road construction equipment changes in emission factors used to calculate emissions of off-road equipment. As shown in Table 16, construction activities are estimated to generate 1,634 MT CO_2e from 2019 to 2020. Total construction GHG emissions were amortized based on the life of the development (residential—30 years) to be included in the total assessment of annual GHG emissions. The annual amortized construction GHG emissions associated with construction of the proposed project would be approximately 54.5 MT CO_2e each year.

Table 16: Construction GHG Emissions (2019–2020)

Construction Phase	On-site	Off-site	Total MT CO_2e
2019			
Site Preparation	17.2	0.7	17.9
Grading	84.2	87.0	171.2
Paving	20.6	1.1	21.8
Building Construction	162.0	427.4	589.4
2020			
Building Construction	224.9	590.8	815.7
Architectural Coating	5.1	12.9	18.0
Total Construction Emissions			**1,634**
Construction Emissions Amortized Over 30 Years			**54.5**

Notes:
Due to rounding, total MT CO_2e may be marginally different from CalEEMod output.
MT CO_2e = metric tons of carbon dioxide equivalents
Source: CalEEMod output (Appendix A).

Project Operations

Operational or long-term emissions occur over the life of the project. Sources for operational emissions include:

- **Motor Vehicles:** These emissions refer to GHG emissions contained in the exhaust from the cars and trucks that would travel to and from the project site.

- **Natural Gas:** These emissions refer to the GHG emissions that occur when natural gas is burned on the project site. Natural gas uses include heating water, space heating, dryers, stoves, or other uses.
- **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the project.
- **Water Transport:** These emissions refer to those generated by the electricity required to transport and treat the water to be used on the project site.
- **Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the project.

Operational GHG emissions by source are shown in Table 17. Detailed calculations and complete assumptions are contained in the CalEEMod output, available in Appendix A of this IS/MND. Total annual emissions for one year of operations were estimated at 3,236 MT CO_2e. The project is estimated to accommodate 1,080 residents and 5 employees, resulting in a service population of 1,085 at full buildout. As shown in Table 17, the project would generate approximately 3.0 MT CO_2e per service person at year 2020. Therefore, the project would not exceed the BAAQMD's 2017 threshold of 4.6 MT CO_2e/service population/year for GHGs, and thus would not have a significant generation of GHGs.

Table 17: Operational GHG Emissions

Emission Source	Total MT CO_2e per year
Area	11.2
Energy	654.7
Mobile (Vehicles)	2,365.6
Waste	104.4
Water	45.3
Amortized Construction	54.5
Total Annual Emissions	**3,236**
Service Population (Employees + Residents)	**1,085**
Project Emission Generation (MT CO_2e/service population/year)	**3.0**
BAAQMD 2017 Threshold (MT CO_2e/service population/year)	**4.6**
Does project exceed threshold?	**No**
Note: MT CO_2e = metric tons of carbon dioxide equivalent. Source: CalEEMod output (Appendix A).	

As shown in Table 17, the project's long-term total operational GHG emissions would not exceed the BAAQMD's threshold of significance. Therefore, the project's generation of GHG emissions would not have a significant impact on the environment.

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

Less than significant impact. In July 2016, the Regional Climate Protection Agency adopted the Sonoma County Regional Climate Action Plan, also known as Climate Action 2020 and Beyond, which applied to the County, including the Town of Windsor. However, the EIR for the Climate Action Plan was invalidated in 2017, and the Town of Windsor subsequently decided not to implement any of the policies in the plan. No other local GHG plans have been adopted by, or are applicable to, the Town. Since no other local or regional Climate Action Plan is in place, the project is assessed for its consistency with the California Air Resources Board's adopted Scoping Plan (California Air Resources Board 2008). This would be achieved with an assessment of the project's compliance with Scoping Plan measures.

The Scoping Plan contains a variety of strategies to reduce the State's emissions. As shown in Table 18, the project is consistent with most of the strategies, while others are not applicable to the project.

Table 18: Scoping Plan Reduction Measures Consistency Analysis

Scoping Plan Reduction Measure	Consistency/Applicability Determination
1. California Cap-and-Trade Program Linked to Western Climate Initiative. Implement a broad-based California Cap-and-Trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.	**Not applicable.** Although the cap-and-trade system has begun, products or services (such as electricity) would be covered and the cost of the cap-and-trade system would be transferred to the consumers.
2. California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Consistent.** This is a statewide measure that cannot be implemented by a project applicant or lead agency. However, the standards would be applicable to the light-duty vehicles that would access the project site.
3. Energy Efficiency. Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent.** This is a measure for the State to increase its energy efficiency standards in new buildings. The project is required to build to the latest standards and would increase its energy efficiency through compliance.

Table 18 (cont.): Scoping Plan Reduction Measures Consistency Analysis

Scoping Plan Reduction Measure	Consistency/Applicability Determination
4. Renewable Portfolio Standard. Achieve 33 percent renewable energy mix statewide. Renewable energy sources include (but are not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas.	**Consistent.** This is a statewide measure that cannot be implemented by a project applicant or lead agency. Pacific Gas and Electric obtains 19 percent of its power supply from renewable sources such as solar and geothermal. It is required to increase this percentage to 33 percent by the year 2020 pursuant to various regulations. Future residents within the project would purchase power that is composed of a greater amount of renewable sources and could install renewable solar power systems that will assist the utility in achieving the mandate.
5. Low Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	**Consistent.** This is a statewide measure that cannot be implemented by a project applicant or lead agency. When this measure is initiated, the standard would be applicable to the fuel used by vehicles that would access the project site.
6. Regional Transportation-Related Greenhouse Gas Targets. Develop regional greenhouse gas emissions reduction targets for passenger vehicles. This measure refers to SB 375.	**Consistent.** The project is not related to developing GHG emission reduction targets.
7. Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	**Consistent.** The standards would be applicable to the light-duty vehicles that would access the project site.
8. Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not applicable.** The project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation.
9. Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Consistent.** This measure is to increase solar throughout California, which is being done by various electricity providers and existing solar programs. The project would comply with Title 24, which requires new buildings to be "solar ready." The project would not preclude the implementation of this strategy.
10. Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	**Not applicable.** This is a statewide measure that cannot be implemented by a project applicant or lead agency. The standards phase-in over model years 2014 through 2018. Vehicles that access the project site are subject to the regulation.
11. Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.	**Not applicable.** This measure would apply to the direct GHG emissions at major industrial facilities. The project is not an industrial land use.

Table 18 (cont.): Scoping Plan Reduction Measures Consistency Analysis

Scoping Plan Reduction Measure	Consistency/Applicability Determination
12. High Speed Rail. Support implementation of a high-speed rail system.	**Not applicable.** This is a statewide measure that cannot be implemented by a project applicant or lead agency.
13. Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The project would comply with the California Energy Code, and thus incorporate applicable energy efficiency features designed to reduce project energy consumption.
14. High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	**Not applicable.** This measure is applicable to the high global warming potential gases that would be used by sources with large equipment (such as in air conditioning and commercial refrigerators) that are not part of this residential project.
15. Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent**. The project would not contain a landfill. The State is to help increase waste diversion. The project would reduce waste with implementation of state mandated recycling and reuse mandates.
16. Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not applicable.** The project site is not forested; therefore, this measure is not applicable.
17. Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent.** This is a measure for State and local agencies. However, with adherence to California Green Building Standards Code regulations, the project will consume energy and water in an efficient manner.
18. Agriculture. In the near-term, encourage investment in manure digesters and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not applicable.** The project site is not designated for agriculture purposes. No dairy or, feedlot that would generate manure are proposed to be implemented by the project.
Source of Scoping Plan Reduction Measures: California Air Resources Board 2008. Source of Project Consistency or Applicability: FCS.	

As discussed in Table 18, the project would comply with regulations aimed to reduce GHG emissions. The project would comply with the California Green Building Standards Code, including requirements to increase recycling, reduce waste, reduce water use, increase bicycle use, and other measures that will reduce GHG emissions. Motor vehicle emissions associated with the project would be reduced through compliance with mandatory state regulations on fuel efficiency and fuel carbon content. Emissions related to project electricity consumption would be reduced because the electric utility, Pacific Gas and Electric, is required to comply with the Renewable Portfolio Standard, which requires utilities to increase its mix of renewable energy sources to 33 percent by 2020.

Considering this information and the fact that annual operational GHG emissions would not exceed BAAQMD's threshold of 4.6 MT CO_2e/service population/year for GHGs (see Table 17), the project would not conflict with regulations adopted by the State of California to reduce GHG emissions. The impact would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
8. Hazards and Hazardous Materials *Would the project:*				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) 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?	☐	☐	☒	☐

Environmental Evaluation

Hazards analyzed in this section include hazardous materials, wildfires, and hazards based on proximity to airport and airstrip operations. Hazardous materials, as defined by the California Code

of Regulations, are substances with certain physical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Hazardous materials are grouped into the following four categories, based on their properties:

- Toxic—causes human health effects
- Ignitable—has the ability to burn
- Corrosive—causes severe burns or damage to materials
- Reactive—causes explosions or generates toxic gases

A hazardous waste is any hazardous material that is discarded, abandoned, or slated to be recycled. The criteria that define a material as hazardous also define a waste as hazardous. If improperly handled, hazardous materials and hazardous waste can result in public health hazards if released into the soil or groundwater or through airborne releases in vapors, fumes, or dust. Soil and groundwater having concentrations of hazardous constituents higher than specific regulatory levels must be handled and disposed of as hazardous waste when excavated or pumped from an aquifer. The California Code of Regulations, Title 22, Sections 66261.20-24 contain technical descriptions of toxic characteristics that could cause soil or groundwater to be classified as hazardous waste.

Would the project:

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

Less than significant impact. Residential developments typically do not involve the regular use, storage, transport, or disposal of significant amounts of hazardous materials. Project construction and operations would involve the minor routine transport and handling of minimal quantities of hazardous substances such as diesel fuels, lubricants, solvents, asphalt, pesticides, and fertilizers. Handling and transportation of these materials could result in the exposure of workers or residents to hazardous materials. However, the project would not create a significant hazard to the public or the environment, because project construction and operations would comply with applicable federal, state, and local laws pertaining to the safe handling and transport of hazardous materials. Impacts would be less than significant.

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

Less than significant impact. As described in Impact 8a, the proposed project would involve the minor use of hazardous materials typically required during construction, such as diesel fuel and other motor lubricants. Contractors would comply with applicable federal, state, and local laws pertaining to the safe handling and transport of hazardous materials, which would minimize potential spill occurrences. Spills that may occur during construction activities would likely be minimal and potential adverse effects would be localized. Plans and specifications typically require contractors to clean up immediately any spills of hazardous materials.

The project site contains undeveloped, disturbed land with unpaved roads. As a result, there is no potential hazards related to asbestos-containing materials or lead-based paint, because there are no existing structures that would need to be demolished. Impacts related to the potential release of hazardous materials would be less than significant.

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

No impact. Windsor Creek Elementary School is located approximately 300 feet east of the project site. As described under Impact 8a, project operations would involve minor routine use of hazardous substances such as diesel fuels, lubricants, pesticides, and fertilizers. The use of these substances would be confined to the project site and be of such limited quantity that no significant impact to the school would occur.

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

Less than significant impact. A significant impact would occur if the project site would be located on a hazardous site compiled in the State's Cortese list in accordance with Government Code Section 65962.5. FCS staff conducted a search of the Cortese list and found no record of hazardous materials sites. The two closest Cortese list sites are located approximately 1.4 miles to the south, at 930 Shiloh Road in Windsor, California.

FCS staff accessed the GeoTracker database to determine if the project site contains sites that require cleanup, such as Leaking Underground Storage Tanks (LUSTs) or Cleanup Program Sites. According to GeoTracker, there is a cleanup program site located on the project site that was completed as of March 3, 2014 and no further action is needed. Impacts related to hazardous material sites would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No impact. The nearest public airport to the project site is the Charles M. Schulz Sonoma County Airport, approximately 1.8 miles south of the project site. The project site is within the Airport Influence Area but is not within any of the safety zones set forth in the Sonoma County Comprehensive Airport Land Use Plan. Thus, the project is subject only to the Airport Land Use Plan provisions that pertain to prohibition of flashing lights, sources of glare that can distract pilots, bird attractants, and electrical interference. The proposed project does not have any characteristics that involve any of these prohibited items; therefore, it is consistent with the safety requirements of the Sonoma County Comprehensive Airport Land Use Plan. This distance precludes the possibility of the project creating a safety hazard for persons residing or working in the project site. No impacts would occur.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No impacts. The closest private airstrip to the project site is the Allan Ranch Flight Park, approximately 1.7 miles to the northeast. The airstrip serves ultralight aircraft but does not serve heavier aircraft that would be used for activities such as agriculture chemical applications or passenger flights. Given this and the distance from the project site, the project would not create safety hazards for persons residing or working in the project site. No impacts would occur.

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

No impact. The project would not modify any existing roadways in a way that would impede emergency access or evacuation. Furthermore, the project proposes to connect Bell Road where it terminates after Johnson Street to the intersection of Bell Road and Grayson Way such that it would facilitate emergency vehicle access to the project site. The location of the project at the end of Bell Road indicates that the project would not physically interfere with emergency evacuations, which would likely occur on roads such as US 101 and Windsor River Road. The project would not impair emergency response or evacuation. No impact would occur.

h) 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?

Less than significant impact. The project is located in an urban area and is surrounded by urban development and infrastructure. These land use types typically are not associated with wildland fires and usually preclude the possibility of exposure to such threats. Impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
9. Hydrology and Water Quality *Would the project:*				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) 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 which would not support existing land uses or planned uses for which permits have been granted?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☒	☐	☐
d) 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 which would result in flooding on- or off-site?	☐	☒	☐	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☒	☐	☐
f) Otherwise substantially degrade water quality?	☐	☒	☐	☐
g) 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?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☒	☐	☐
i) 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?	☐	☒	☐	☐
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

a) Violate any water quality standards or waste discharge requirements?

Less than significant impact. The project site is adjacent to Windsor Creek. Windsor Creek flows from the eastern foothills in a southwesterly direction through the town. No other surface waters are located on the project site.

The Windsor Municipal Code contains requirements for new development and redevelopment projects to minimize pollutants in stormwater runoff. These requirements include BMPs such as erosion control, revegetation, stream setbacks, and parking lot cleaning that are detailed in the Town's Phase II NPDES [National Pollutant Discharge Elimination System] Storm Water Management Plan. The Town of Windsor Municipal Code Title IX, Chapter 4 includes stormwater discharge requirements designed to achieve compliance with the North Coast RWQCB's NPDES permit and Waste Discharge Requirements for MS4 Discharges (Order No. R1-2015-0030; NPDES No. CA0025054). Discharges to the Town's stormwater 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 North Coast RWQCB.

The project would connect to the Town's sewer system. As described in Section 17, Utilities and Service Systems, the Town has adequate capacity in its wastewater treatment system to accommodate wastewater from the project. As such, the project would not be expected to result in a violation of waste discharge requirements associated with the Town's wastewater treatment system and impacts would be less than significant.

b) 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 which would not support existing land uses or planned uses for which permits have been granted?

Less than significant impact. The project proposes to connect to the Town's water system. No wells would be drilled to supply water for the project; therefore, the project would not affect local aquifers.

The proposed project would develop 360 dwelling units on the project site, along with recreational facilities and parking areas. The increase in impervious surfaces would reduce the available recharge area for local groundwater aquifers. However, the project would maintain open space area along Windsor Creek. In addition, street trees would be planted along all streets, and trees and other landscaping would be installed throughout the project site. The project would maintain significant open space areas and landscaping that would continue to allow for recharge. As such, the impact on groundwater would be less than significant.

c) Substantially alter the existing drainage pattern of area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less than significant impact with mitigation incorporated. As previously stated in Impact 9b, the proposed development would increase the impervious surfaces on the project site. The proposed project would likely alter the existing drainage pattern of the area. However, the project proposes to maintain significant open space areas and landscaping. In addition to the applicable North Coast RWQCB regulations, the project would be required to comply with existing General Plan policies, Low Impact Development (LID) and BMPs as mitigation. The Initial Storm Water LID Submittal for the project suggests BMPs that could control impacts of siltation and erosion to levels that are less than substantial.

The Town of Windsor will condition the project to demonstrate that there would be no net increase in surface elevation adjacent to or at any point downstream or upstream of the project site between pre-development conditions and post-development conditions for any storm event with a recurrence interval of 100 years or less. To assist in meeting this requirement, the condition also requires that the project provide adequate underground storm drain capacity across the project site to accommodate 10-year flows under conditions of full development of the project site and all upstream areas draining to the project site in accordance with the most recent adoption of the Town of Windsor General Plan. The condition further requires that the project provide adequate underground and overland flow capacity across the project site to accommodate 100-year flows under conditions of full development of the project site and all upstream areas draining to the project site in accordance with the most recent adoption of the Town of Windsor General Plan, without flooding of structures or unacceptable flooding or damage to other facilities, as determined by the Town Engineer. All design, analyses, and calculations would be subject to review and approval by the Town Engineer to ensure that the project design is in compliance with these requirements. This condition is reflected in Mitigation Measure HYD-1. Therefore, the project would not worsen the existing condition, and project impacts would be less than significant.

d) 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 which would result in flooding on- or off-site?

Less than significant impact with mitigation incorporated. The project proposes development of 360 dwelling units, 665 parking spaces, and new vehicular access from extensions of Bell Road and Bill Beedie Way. The amount of impervious surface would increase on the project site. However, the project's storm drainage would be designed to be consistent with the Town's storm drainage system, which is designed to capture, direct, and convey peak storm event flows away from buildings, thereby protecting life and public property from flood hazards associated with events that have a less than or equal to 1 percent chance of occurrence. The Station Area/Downtown Specific Plan states that significant impacts to major and secondary waterways (not already identified in the Windsor Cumulative Drainage Impact Mitigation Program Update during peak events) are unlikely and associated infrastructure improvements are not anticipated.

The Town of Windsor will condition the project to demonstrate that there would be no net increase in surface elevation adjacent to or at any point downstream or upstream of the project site between pre-development conditions and post-development conditions for any storm event with a recurrence interval of 100 years or less. To assist in meeting this requirement, the condition also requires that the project provide adequate underground storm drain capacity across the project site to accommodate 10-year flows under conditions of full development of the project site and all upstream areas draining to the project site in accordance with the most recent adoption of the Town of Windsor General Plan. The condition further requires that the project provide adequate underground and overland flow capacity across the project site to accommodate 100-year flows under conditions of full development of the project site and all upstream areas draining to the project site in accordance with the most recent adoption of the Town of Windsor General Plan, without flooding of structures or unacceptable flooding or damage to other facilities, as determined by the Town Engineer. All design, analyses, and calculations would be subject to review and approval by the Town Engineer to ensure that the project design is in compliance with these requirements. This condition is reflected in Mitigation Measure HYD-1. Therefore, the project would not worsen the existing condition, and project impacts would be less than significant.

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than significant impact with mitigation incorporated. As described in Impact 9d, no significant impacts are anticipated to waterways as a result of development under the Station Area/Downtown Specific Area, which includes the project site. As described in Impact 9a, the Town has requirements for new development and redevelopment projects to minimize pollutants in stormwater runoff to achieve compliance with the North Coast RWQCB's NPDES permit and Waste Discharge Requirements for MS4 Discharges.

The Town of Windsor will condition the project to demonstrate that there would be no net increase in surface elevation adjacent to or at any point downstream or upstream of the project site between pre-development conditions and post-development conditions for any storm event with a recurrence interval of 100 years or less. To assist in meeting this requirement, the condition also requires that the project provide adequate underground storm drain capacity across the project site to accommodate 10-year flows under conditions of full development of the project site and all upstream areas draining to the project site in accordance with the most recent adoption of the Town of Windsor General Plan. The condition further requires that the project provide adequate underground and overland flow capacity across the project site to accommodate 100-year flows under conditions of full development of the project site and all upstream areas draining to the project site in accordance with the most recent adoption of the Town of Windsor General Plan, without flooding of structures or unacceptable flooding or damage to other facilities, as determined by the Town Engineer. All design, analyses, and calculations would be subject to review and approval by the Town Engineer to ensure that the project design is in compliance with these requirements. This condition is reflected in Mitigation Measure HYD-1. Therefore, the project would not worsen the existing condition, and project impacts would be less than significant.

f) Otherwise substantially degrade water quality?

Less than significant impact with mitigation incorporated. The Specific Plan includes proposed improvements to the street network, including an extension of Bell Road through the project site with the bridge over Windsor Creek. The proposed project would include a pedestrian bridge proposed over Windsor Creek and a creekside trail along Windsor Creek. Construction activities associated with these bridges have the potential to increase sedimentation in the creek. Work within the creek would be subject to the Clean Water Act Section 404 and Section 401 permitting processes, as required by Mitigation Measure BIO-3, which is described in Section 4, Biological Resources. These permits typically have conditions designed to minimize impacts on the water quality of affected streams. Compliance with Section 404 and 401 permit conditions would reduce the impacts of bridge construction on water quality in Windsor Creek to a level that would be less than significant.

g) 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?

Less than significant impact with mitigation incorporated. Although the project site is not within a 100-year flood hazard zone as delineated by the Federal Emergency Management Agency, the project site is susceptible to inundation during a 100-year storm event because of an existing downstream constraint associated by a Northwestern Pacific Railroad trestle over Windsor Creek. The trestle would obstruct flows during a 100-year storm event causing the southern portion of the project site to be flooded. The Town is working with SMART on correcting the deficiencies associated with the trestle. Mitigation Measure HYD-2 requires the applicant to prepare and submit plans demonstrating that the finished floor elevation of all project structures be at least 1 foot above the 100-year flood elevation.

Additionally, the proposed Bell Road bridge over Windsor Creek has the potential to worsen this existing condition. Accordingly, Mitigation Measure HYD-3 is proposed requiring the new Bell Ridge bridge to avoid worsening the drainage problem.

Lastly, Mitigation Measure HYD-1 would ensure that the proposed project does not worsen this preexisting problem. With the implementation of these mitigation measures, impacts would be less than significant.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Less than significant impact with mitigation incorporated. Although the project site is not within a 100-year flood hazard zone as delineated by the Federal Emergency Management Agency, the project site is susceptible to inundation during a 100-year storm event because of an existing downstream constraint associated by a Northwestern Pacific Railroad trestle over Windsor Creek. The trestle would obstruct flows during a 100-year storm event causing the southern portion of the project site to be flooded. The Town is working with SMART on correcting the deficiencies associated with the trestle. Mitigation Measure HYD-2 requires the applicant to prepare and submit

plans demonstrating that the finished floor elevation of all project structures be at least 1 foot above the 100-year flood elevation.

Additionally, the proposed Bell Road bridge over Windsor Creek has the potential to worsen this existing condition. Accordingly, Mitigation Measure HYD-3 is proposed requiring the new Bell Ridge bridge to avoid worsening the drainage problem.

Lastly, Mitigation Measure HYD-1 would ensure that the proposed project does not worsen this preexisting problem. With the implementation of these mitigation measures, impacts would be less than significant.

Impacts would be less than significant.

i) 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?

Less than significant impact. There are no levees identified within the vicinity. The Station Area/Downtown Specific Plan notes that failure of the Warm Springs Dam, approximately 12 miles west of Healdsburg, could inundate the entire Specific Plan area except the higher ground above 100 feet in elevation. Floodwaters would reach Windsor within 1 to 2 hours following the dam failure event. As indicated in the Station Area/Downtown Specific Plan EIR and according to the Sonoma County Dam Failure Evaluation Plan, this would allow sufficient time for emergency evacuation of the Town. Based on adherence to the Evacuation Plan, and the fact that dam failure is an unlikely event, impacts related to dam or levee failure are considered less than significant.

j) Inundation by seiche, tsunami, or mudflow?

No impact. A seiche is a seismically or wind-induced wave on an enclosed body of water, such as a lake or reservoir. There are no lakes or reservoirs in the vicinity, so there would be no seiche hazard. The project site is more than 18 miles from the Pacific Ocean with mountain ranges in between the site and the ocean, so tsunami inundation is unlikely. The project site is located in a relatively flat area, so mudflows are unlikely to occur. In summary, the project would have no impact related or seiches, tsunamis, or mudflows.

Mitigation Measures

Implement Mitigation Measure BIO-3 and:

MM HYD-1 Prior to issuance of building permits, the project applicant shall prepare and submit drainage improvement plans to the Town of Windsor that demonstrate that there would be no net increase in surface elevation adjacent to or at any point downstream or upstream of the project site between pre-development conditions and post-development conditions for any storm event with a recurrence interval of 100 years or less. The project shall provide an adequate underground storm drain capacity across the project site to accommodate 10-year flows under conditions of full development of the project site and all upstream areas draining to the project

site in accordance with the most recent adoption of the Town of Windsor General Plan. The project shall provide adequate underground and overland flow capacity across the project site to accommodate 100-year flows under conditions of full development of the project site and all upstream areas draining to the project site in accordance with the most recent adoption of the Town of Windsor General Plan, without flooding of structures or unacceptable flooding or damage to other facilities, as determined by the Town Engineer. All design, analyses, and calculations shall be subject to review and approval by the Town Engineer to ensure that the project design is in compliance with these requirements.

MM HYD-2 Prior to issuance of grading permits for the proposed project, the project applicant shall prepare and submit plans to the Town of Windsor demonstrating that all structures are at least 1 foot above the 100-year flood elevation.

MM HYD-3 Prior to issuance of permits for the new Bell Road bridge, the project applicant shall prepare and submit plans to the Town of Windsor demonstrating that the proposed bridge does not exacerbate the existing drainage conditions within Windsor Creek.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
10. Land Use and Planning *Would the project:*				
a) Physically divide an established community?	☐	☐	☐	☒
b) 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?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?	☐	☒	☐	☐

Environmental Evaluation

Would the project:

a) Physically divide an established community?

No impact. The physical division of an established community would occur if construction of a large linear feature such as a railroad or interstate highway separated an existing community or if a feature that connects a community is removed, such as a bridge. The project proposes to develop 360 dwelling units on a 20.2-acre site that is currently undeveloped. Currently, Bell Road provides the only access to the project site. This road currently does not provide a vital linkage or access route to areas other than to the project site. In fact, the project would improve connectivity by connecting the two segments of Bell Road. Project access would be from the connected Bell Road and an extended Bill Beedie Way, as well as a pedestrian bridge that would cross Windsor Creek and connect the project to Windsor Creek Elementary School. As a result, the project would not physically divide an established community, and no impacts would occur.

b) 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?

Less than significant impact. The Windsor General Plan currently designates the project site High Density Residential (16 to 32 units per acre), Medium Density Residential (8 to 16 units per acre), and Low Density Residential (5 to 8 units per acre). In addition, the project site is within the Station Area/Downtown Specific Plan (Specific Plan) and is designated a mixture of Village Residential (5–8 units/acre), Medium Density Residential (8–16 units/acre), and Compact Residential (12–24 units/acre), with a Potential New Park designated in the area but with no specific location.

The project site is located within the Specific Plan area. The Station Plan was developed to be consistent with the General Plan, and updates to the General Plan 2040 consistent with the Specific Plan. Therefore, should there be any inconsistencies between the two, the Specific Plan would be the applicable regulatory document. The Specific Plan also states that where an inconsistency between the Specific Plan and Zoning Ordinance exists, the Specific Plan would supersede.

The project proposes to develop 360 dwelling units on a 20.2-acre site, which would result in a density of 17.8 units/acre. Therefore, the project's density will be consistent with the density in each respective land use designation. As a result, the project would be consistent with the General Plan, the Specific Plan, and the Town Zoning Ordinance.

The project also would be consistent with the Specific Plan's goal to establish a 30-foot buffer from creek edges and promote public access to creeks. The project site plan shows the 30-foot buffer is maintained from Windsor Creek and the proposed trail and a pedestrian bridge would connect public access to the creek. As a result, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that was adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?

Less than significant impact with mitigation incorporated. As discussed in Section 4, Biological Resources, the project site is located within the SRPCS, a conservation program put in place to mitigate adverse effects on listed species from development on the Santa Rosa Plain. Four listed plant species have the potential to occur on the project site. For this reason, implementation of Mitigation Measure BIO-1 requires implementation of compensatory mitigation, as approved by USFWS, for protection of potential existing listed plants. As such, the proposed project would not conflict with the provisions of the SRPCS, and impacts would be less than significant with mitigation.

Mitigation Measures

Implement Mitigation Measure BIO-1.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
11. Mineral Resources *Would the project:*				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No impact. The project site does not support any mineral extraction activities, nor do any known mineral deposits exist on-site. Therefore, implementation of the project would no result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. No impact would occur.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No impact. The project site does not support any mineral extraction activities, nor do any known mineral deposits exist on-site. Therefore, implementation of this project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. No impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
12. Noise *Would the project result in:*				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Environmental Evaluation

Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than significant impact with mitigation incorporated. A significant impact would occur if the project resulted in the exposure of persons to or generation of noise levels that exceed the standards established in the Town of Windsor General Plan and noise ordinance.

Existing Noise Levels

The existing noise levels on the project site were documented through short-term ambient noise measurements taken on the project site. The noise monitoring locations were selected in order to document existing long-term ambient noise levels on the project site and to determine compatibility

of the proposed residential land use development with the Town's land use compatibility standards. The noise measurements were taken on Friday February 9, 2018 between 12:30 p.m. and 1:15 p.m. A summary of the results of the noise level measurements is provided in Table 19. The noise measurement data sheets are provided in Appendix E of this document.

Table 19: Noise Monitoring Summary

Site Location*	Location Description—Primary Noise Sources	dBA L_{eq}	dBA L_{max}	dBA L_{min}
ST-1	Eastern portion of site, 400 feet West of Windsor Creek Elementary School—Car traffic, construction, airplane flyovers, and birds	46.9	71.4	36.4
ST-2	Southern portion of site, 450 feet west of Old Oak Road near railroad tracks—dogs, airplane flyovers, and birds	42.3	51.9	37.9
ST-3	Northern portion of site, 275 feet south of Johnson Street near railroad tracks—Car traffic, construction, people conversing	46.0	55.3	38.4
Source: FirstCarbon Solutions, 2018.				

Short-term Construction Noise Impacts to Off-site Receptors

Two types of short-term noise impacts could occur during project construction. First, construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the project site (vehicle engine noise, the sound of vehicle doors shutting, etc.). Although there would be a relatively high single event noise exposure potential causing intermittent noise nuisance, the effect on longer-term (hourly or daily) ambient noise levels would be small. Therefore, short-term, construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related to noise generated during construction activities on the project site. Construction noise levels are rarely steady in nature and often fluctuate, depending on the type and number of equipment being used at any given time. In addition, there could be times where large equipment is not operating and noise would be at or near normal ambient levels. Construction is completed in discrete steps, each of which has its own mix of equipment and its own noise characteristics. These various sequential phases would change the character of the noise generated on the site, and therefore the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

Table 20 shows typical noise levels of construction equipment, measured at a distance of 50 feet from the operating equipment. Because the noisiest construction equipment is earthmoving equipment, the site preparation phase is expected to be the loudest phase of construction. The site preparation phase is expected to require the use of many types of construction equipment, such as

front-end loaders, compactors, hydraulic backhoes, and haul trucks. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation, followed by 3 or 4 minutes at lower power settings. Note that impact equipment such as pile drivers is not expected to be used during construction of this project

Table 20: Typical Construction Equipment Maximum Noise Levels, L_{max}

Type of Equipment	Specification Maximum Sound Levels for Analysis (dBA at 50 feet)
Auger Drill Rig	85
Vibratory Pile Driver	95
Jackhammers	85
Pneumatic Tools	85
Pumps	77
Scrapers	85
Cranes	85
Portable Generators	82
Rollers	85
Dozers	85
Tractors	84
Front-End Loaders	80
Backhoe	80
Excavators	85
Graders	85
Air Compressors	80
Dump Truck	84
Concrete Mixer Truck	85
Pickup Truck	55
Source: FHWA 2006. Highway Construction Noise Handbook. August.	

A characteristic of noise is that each doubling of the sound sources with equal strength increases the noise level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, the worst-case combined noise level during the site preparation phase of construction would be a maximum hourly construction noise level of 90 dBA L_{max}, with reasonable worst-case hourly noise levels ranging up to 86 dBA L_{eq} at 50 feet. The closest sensitive receptors are single-family residences located north and northeast of the project site. The nearest off-site residences would be located approximately 50 feet from the center of construction activity where multiple pieces of heavy machinery could be operating. At this distance, if multiple pieces of

heavy construction equipment operated simultaneously at the nearest construction footprint, the reasonable worst-case hourly average construction noise levels would range up to 86 dBA L_{eq}.

While the Town does not set a specific quantifiable noise level limit for construction, the Town does regulate construction noise by limiting construction activity to the least intrusive periods. Therefore, to ensure that the project would not result in excessive noise levels that could result in sleep disturbance of nearest off-site sensitive receptors, the project shall implement the best management noise reduction techniques and practices, as well as compliance with the stated permissible hours of noise-producing construction activities, included in Mitigation Measure NOI-1. Implementation of this measure would reduce construction noise impacts to off-site sensitive receptors to less than significant.

Long-term Operational Impacts

Transportation Noise Impacts to On-site Receptors

A significant impact would occur if the project would be exposed to noise levels in excess of the Town's normally acceptable standard of 65 dBA L_{dn} for new multi-family residential land use development.

Existing Noise Conditions

FCS conducted three short-term ambient noise measurements on February 9, 2018 to document the existing ambient noise environment of the project site. Existing ambient noise conditions were then compared for compliance with the Town's land use noise compatibility criteria for new residential land use development. The primary transportation noise source in the project vicinity is traffic noise levels along Windsor River Road. Measured average daytime ambient noise levels at the project site ranged from 42.3 dBA to 46.9 dBA L_{eq}, with documented maximum levels ranging from 51.9 dBA to 71.4 dBA L_{max}, as measured near the project's boundaries. The documented existing ambient noise environment is within the Town's "normally acceptable" range of below 65 dBA CNEL for this new multi-family residential land use development.

Traffic Noise Impacts

The FHWA highway traffic noise prediction model (FHWA RD-77-108) was used to predict future traffic-noise levels along roadway segments in the project vicinity. Traffic data used in the model were obtained from the traffic analysis prepared by TJKM Transportation Consultants for the project. The resultant noise levels were weighed and summed over a 24-hour period in order to determine the CNEL values. The traffic noise modeling input and output files are included in Appendix E. The traffic noise modeling results for existing and cumulative conditions, without and with the project, are summarized in Table 21.

Table 21: Existing and Future Modeled Roadway Noise Levels

Roadway Segment	CNEL (dBA) 50 feet from Centerline of Outermost Lane					
	Existing No Project	Existing + Project	Increase over Existing No Project (dBA)	Cumulative No Project	Cumulative + Project	Increase over Cumulative No Project (dBA)
Windsor River Road—Road 2 (Johnson Street) to Bell Road	63.0	63.0	0.0	63.9	63.9	0.0
Windsor River Road—Bell Road to Conde Lane	63.2	63.7	0.5	63.8	64.2	0.4
Bell Road—Windsor River Road to Johnson Street	53.0	56.4	3.4	56.2	58.3	2.1
Bell Road—Johnson Street to End of Bell Road (project access)	48.1	55.1	7.0	56.6	58.5	1.9
Johnson Street—Road 2 (Johnson Street) to Bell Road	42.8	45.4	2.6	44.7	46.5	1.8
Johnson Street—Bell Road to Conde Lane	49.7	50.6	0.9	49.8	50.8	1.0
Source: FCS, 2018.						

Based on the traffic noise modeling results shown in Table 21, the project site would be exposed to traffic noise levels ranging from 46.5 dBA to 58.5 dBA CNEL at 50 feet from the centerline of the nearest travel lane of the adjacent roadway segments of Johnson Street and Bell Road, under Cumulative plus Project conditions. These traffic noise levels are below the Town's normally acceptable threshold of 65 dBA L_{dn} for new multi-family residential land use development. Therefore, the project would not expose on-site residents to traffic noise levels in excess of the Town's standards.

Railroad Noise Impacts

Other noise sources of concern in the project vicinity that could affect the proposed noise-sensitive land uses is the potential future activity on the NWPRR line located directly east of the project site. The NWPRR tracks adjacent to the project site are owned by Sonoma-Marin Area Rail Transit (SMART). SMART offers regional passenger and commuter rail service in Sonoma and Marin counties. Section 16, Transportation/Traffic, describes SMART in more detail.

According to the Town's General Plan EIR, the North Coast Railroad Authority re-established freight service through Windsor in 2011. The freight service includes two freight trains one to two times per week. The freight trains include one train with up to 60 cars providing service between Willits and Lombard, one 25-car train with service between Lombard and Redwood Valley, and one 60-car solid waste transport train. According to the March 2008 Draft Supplemental EIR for the SMART Project, with implementation of the SMART project, this rail line could see up to 12 daily roundtrips for commuter trains and up to 6 daily pass-bys from freight trains. This level of train activity would

generate noise levels averaging up to 68 dBA CNEL, assuming a direct line of sight, at approximately 100 feet from the centerline of the railroad. When trains sound their horns as they approach an at-grade crossing, maximum noise levels could reach up to 97 dBA L_{max} at approximately 100 feet from the nearest at-grade railroad crossing.

The nearest proposed façade of the project would be located approximately 125 feet from the centerline of the rail line and approximately 700 feet from the nearest at-grade railroad crossing. At these distances, the nearest proposed multi-family residential structures could be exposed to noise levels of up to 66 dBA CNEL and 82 dBA L_{max} from future railroad activity. These noise levels would be in the City's "conditionally acceptable" range of between 60 dBA and 70 dBA CNEL for new multi-family residential development. According to the City's policies, new development may occur under these conditions provided needed noise insulation features are included in the design to maintain normally acceptable interior noise levels, typically defined to be 45 dBA CNEL for areas where sleeping would occur.

Based on the EPA's Protective Noise Levels (EPA 550/9-79-100, November 1978), with a combination of walls, doors, and windows, standard construction for northern California residential buildings would provide approximately 25 dBA in exterior-to-interior noise reduction with windows closed, and approximately 15 dBA with windows open. With windows open, interior spaces for the proposed residential units would not meet the interior noise standard of 45 dBA CNEL (66 dBA–15 dBA = 51 dBA). However, with windows closed, the interior noise level standard of 45 CNEL would be met (66 dBA–25 dBA = 41 dBA). All residential units of the proposed project would include an alternative ventilation system in compliance with the UBC requirements, such as a mechanical ventilation system, to ensure that windows can remain closed for a prolonged time period. This noise reduction feature would reduce railroad noise to meet the interior noise level standard of 45 dBA CNEL.

Maximum noise levels from trains sounding their warning horns as they approach the at-grade crossing at Windsor River Road could result in sleep disturbance of residents on the project site. The nearest proposed multi-family residential structures could be exposed to noise levels of up to 82 dBA L_{max} when trains sound their warning horns as they approach the at-grade intersection. Studies show that limiting maximum noise levels to 55 dBA within bedrooms limits the probability of disturbing the sleep of persons with normal sensitivity. All impacted units on the project site would be multi-family residential units located within 300 feet of the rail line that have a line of sight to the rail line. At distances beyond 300 feet, train horn noise levels would attenuate to below 72 dBA L_{max}, which with standard construction and windows closed would reduce train horn noise levels to below 55 dBA L_{max}. For all units within 300 feet of the rail line, in order to achieve sufficient exterior to interior noise reduction for rooms designed for sleeping, upgraded window assemblies would be required. Standard dual pane windows have a Sound Transmission Class (STC) rating of 26, and standard exterior walls with stucco siding have an STC rating of 46. Therefore, window assemblies must be upgraded to meet a minimum STC rating of 30 for the façades of impacted units would reduce maximum railroad noise levels to below the 55 dBA L_{max} threshold for sleep disturbance impacts with an adequate margin for safety (82 dBA–30 dBA = 52 dBA). Mitigation Measure NOI-2 would require the installation of these project design features. Implementation of Mitigation Measure NOI-2 would reduce potential railroad noise impacts to a level that would be less than significant.

Stationary-Source Noise Impacts to Off-site Receptors

A significant impact would occur if the project would result in noise levels that would create ambient noise levels in excess of the maximum allowable exterior noise levels of 50 dBA and 55 dBA for nighttime (10:00 p.m. to 7:00 a.m.) and daytime (7:00 p.m. to 10:00 a.m.) hours respectively, as measured at any receiving residential property. Residential air conditioning and heating systems must comply with these standards.

At the time of preparation of this analysis, details were not available pertaining to proposed residential mechanical ventilation systems for the project; therefore, a reference noise level for typical residential mechanical ventilation systems was used for analytical purposes. Noise levels from typical residential mechanical ventilation equipment range up to approximately 60 dBA L_{eq} at a distance of 25 feet. Residential mechanical ventilation systems could be located as close as 50 feet of the nearest off-site residential receptor located north of the project site. All rooftop mechanical equipment will be "sunken" and enclosed on all sides. The nearest homes have a solid 6-foot-high wooden fence that would provide a minimum of 5 dBA in noise reduction shielding. Therefore, noise generated by proposed mechanical ventilation equipment would be attenuated to approximately 49 dBA L_{eq} at the nearest off-site residential receptor. Mechanical ventilation equipment operational noise levels would not exceed the City's nighttime noise performance standard of 50 dBA L_{eq}. The impact of mechanical ventilation equipment operational noise levels on sensitive off-site receptors would be less than significant.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact with mitigation incorporated. A significant impact would occur if the project would result in groundborne vibration levels that could result in damage to existing structures or that could expose future residents to vibration levels in excess of Federal Transit Administration (FTA) thresholds.

Groundborne vibrations consist of rapidly fluctuating motions within the ground that have an average motion of zero. Vibrating objects in contact with the ground radiate vibration waves through various soil and rock strata to the foundations of nearby buildings. When assessing annoyance from groundborne noise, vibration is typically expressed as root mean square velocity in units of decibels of 1 micro-inch per second. To distinguish vibration levels from noise levels, the unit is written as "VdB." Human perception to vibration starts at levels as low as 67 VdB and sometimes lower. Annoyance due to vibration in residential settings starts at approximately 70 VdB. Common sources of groundborne vibration include construction activities such as blasting, pile driving, and operating heavy earthmoving equipment. Construction vibration impacts on building structures are generally assessed in terms of peak particle velocity (PPV).

Construction Vibration Impacts

The most substantial vibration sources associated with implementation of the proposed project would be the construction equipment used during grading and preparation of the project site. The effect of construction vibration would depend upon the vibration level, the distance between construction activities, and the nearest vibration-sensitive receptor.

Of the variety of equipment that would be used during construction, large vibratory rollers would produce the greatest groundborne vibration levels. Impact equipment such as pile drivers is not expected to be used during construction of this project. Large vibratory rollers produce groundborne vibration levels ranging up to 0.210 inch per second (in/sec) PPV at 25 feet from the operating equipment. The nearest off-site receptor to the proposed construction footprint are the single-family residential uses to the north of the project site. These receptors are located approximately 30 feet from the nearest construction area where large vibratory rollers would potentially operate. At this distance, groundborne vibration levels could range up to 0.15 in/sec PPV from operation of a large vibratory roller. This is below the industry standard vibration damage criterion of 0.2 in/sec PPV for residential non-engineered timber and masonry buildings. Therefore, construction-related groundborne vibration impacts would be considered less than significant.

Operational Vibration Impacts

The project does not include any permanent noise sources that would expose persons to excessive groundborne vibration or noise levels. However, existing sources of groundborne vibration in the project vicinity include vibration from railroad activity along the NWPRR rail line adjacent to the project site.

The Town of Windsor has not identified quantifiable vibration limits that can be used to evaluate the compatibility of land uses with the expected vibration environment. Therefore, for purposes of this analysis, the FTA vibration impact criteria has been used to evaluate the land use compatibility along railroad lines. The FTA vibration impact criteria has been developed to assess vibration impacts associated with rapid transit projects based on maximum overall levels for a single event. The FTA considers fewer than 30 vibration events per day to be "infrequent events" that would be subject to an 80 Vdb threshold. Rail operations along this portion are not expected to exceed 30 operations per day. Therefore, the applicable impact threshold is 80 VdB.

Based on data in the March 2008 Draft Supplemental EIR for the SMART Project, the ground vibration at 115 feet from the rail track centerline could be 79 VdB because of freight rail pass-bys and would be below 71 VdB because of SMART commuter rail operations. The nearest residential façade on the project site would be located approximately 125 feet from the centerline of the rail tracks. Thus, projected vibration levels from freight rail pass-bys would be expected to attenuate to below 70 VdB at the nearest façade. Railroad vibration levels would not exceed FTA's applicable impact threshold of 80 VdB as measured at the nearest proposed residential structure façade. Railroad vibration impacts to the proposed project would be less than significant.

Upon completion of construction, the project would not include any features or operations that would produce groundborne vibrations. As such, implementation of the proposed project would not result in any permanent vibration sources that would expose persons within the project vicinity to excessive groundborne vibration levels. Therefore, project-related groundborne vibration impacts would be considered less than significant.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than significant impact. Significant noise impacts to off-site receptors would occur if the project would result in a substantial increase in ambient noise levels compared with noise levels existing without the project. A change of 3 dB is the lowest change that can be perceptible to the human ear in outdoor environments, while a change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments. In addition, according to the policies of the Noise Element of the General Plan, the Town requires the inclusion of design modifications and techniques if new transportation-related noise sources cause the ambient noise levels to rise by more than 5 dBA. Therefore, for purposes of this analysis, a substantial permanent increase in ambient noise levels is considered 5 dBA or greater above levels existing without the project.

The highest traffic noise level increase with implementation of the project would occur along Bell Road from Johnson Street to the end of Bell Road (project access) under both Existing plus Project and Cumulative plus Project conditions. This roadway segment would experience an increase of 7 dBA under Existing plus Project conditions compared with existing conditions without the project. This is the only roadway segment that would experience a substantial increase in traffic noise levels (greater than 5 dBA). However, it should be noted that, even with this increase, the resulting traffic noise levels along this roadway segment would range up to 56.6 dBA CNEL under Existing plus Project conditions, and up to 58.5 dBA CNEL under Cumulative plus Project conditions. These noise levels are below the City's land use compatibility threshold of 60 dBA CNEL from transportation noise sources for residential land uses.

As shown in the railroad noise discussion under Impact 12a, train activity would generate noise levels averaging up to 68 dBA CNEL, assuming a direct line of sight, at approximately 100 feet from the centerline of the railroad. The existing residential properties along Bell Road are located within 350 feet of the rail line. At this distance, these residential land uses would be exposed to railroad noise levels of up to 57 dBA CNEL under future conditions without the project. Therefore, project-related traffic noise levels, which would range up to 58.5 dBA CNEL along this segment under Cumulative plus Project conditions, would not result in a substantial increase in ambient noise levels at the existing residential land uses along Bell Road, compared with conditions existing without the project. Implementation of the project would not result in a substantial permanent increase in ambient noise levels compared to noise levels that would exist without the project, and this impact would be less than significant.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than significant impact with mitigation incorporated. As described under Impact 12a, noise impacts could occur during ground clearing, excavation, and foundation construction activities on the project site. The nearest off-site residences could experience worst-case construction noise levels of up to 86 dBA L_{eq} if multiple pieces of heavy construction equipment operated simultaneously at the nearest construction footprint. Although there would be a relatively high single-event noise exposure potential causing intermittent noise nuisance, the effect on longer-term

(daily) ambient noise levels would be small. In addition, compliance with the City's permissible hours of construction as well as implementation of best management noise reduction techniques and practices outlined in Mitigation Measure NOI-1 would reduce construction noise impacts on sensitive receptors in the project vicinity to a level of less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No impact. The Charles M. Shultz Sonoma County Airport is located approximately 1.8 miles to the south of the project site. The project site is outside of the 55-dBA CNEL noise contour established for the airport. Therefore, people residing or working on the project site would not be exposed to excessive noise levels associated with public airport operations. No impact would occur.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No impact. The closest private airstrip to the project site is the Allan Ranch Flight Park, which is approximately 1.7 miles to the northeast. The airstrip serves ultralight aircraft but does not serve heavier aircraft that would be used for activities such as agriculture chemical applications or passenger flights. Given this and the distance from the project site, the project would not expose people residing or working on the project site to excessive noise levels from private airstrip operations. No impact would occur.

Mitigation Measures

MM NOI-1 To reduce potential construction noise impacts, the following measures shall be implemented:

- The construction contractor shall ensure that all construction equipment has appropriate sound muffling devices that are properly maintained and that are used at all times when such equipment is in operation.
- The construction contractor shall ensure that all internal combustion engine equipment is equipped with mufflers that are in good operating condition and appropriate for the equipment.
- The construction contractor shall ensure that "quiet" models of air compressors and other stationary construction equipment are utilized where such technology exists.
- The construction contractor shall locate, to the maximum extent practical, on-site equipment staging areas to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the project site.
- The construction contractor shall prohibit idling of internal combustion engines in excess of 5 minutes.

- All noise-producing construction activities, including deliveries of materials and warmup of equipment, shall be limited to the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday and between the hours of 8:00 a.m. and 7:00 p.m. on Saturday. These noise-producing construction activities shall be prohibited at any time on Sundays.

MM NOI-2 In order to reduce the potential for sleep disturbance related to noise from railroad activity along the Northwestern Pacific Railroad/Sonoma-Marin Area Rail Transit railroad line, the project shall incorporate the following design features or their equivalent:

- For the proposed multi-family residential uses, all façades of rooms designed for sleeping that have a line of sight to the railroad line and are located within 300 feet of the railroad track centerline shall be designed and built to combined minimum Sound Transmission Class (STC) 30 standards. This can be achieved through the use of 2-inch x 4-inch or 2-inch x 6-inch wood studs, fiberglass insulation, a single layer of gypsum board attached to the inside of the studs, and a 7/8-inch exterior cement plaster (Stucco) or fiber cement siding (HardiPlank) finish. All windows on these façades must be STC 30 rated windows. The combined window and wall assemblies must be designed and constructed so that there are no gaps around windows, with all protrusions or openings properly sealed.
- Prior to issuance of final building permits, wall design specifications showing the exterior-to-interior noise to achieve the interior maximum noise exposure standard shall be submitted to the City.
- All dwelling units shall be equipped with forced-air mechanical ventilation in compliance with the Uniform Building Code requirements, to ensure that windows can remain closed for a prolonged time period.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
13. Population and Housing *Would the project:*				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than significant impact. Direct population growth occurs when a project creates housing units that would be used as permanent housing. The project would develop a total of 360 dwelling units on a 20.2-acre site. Based on the Town of Windsor's average household size of 2.92, as provided by the California Department of Finance, the project could directly increase the population by as much as 1,051 persons. This represents an increase of 3.8 percent relative to the Town's 2017 estimated population of 27,371.

The implementation of the project would be consistent with the Town of Windsor General Plan to create more high-density residential areas and incorporate trails and creeks. The project site is surrounded by urban uses that are served by urban services and utilities (roadways, potable water, sewer, electricity, natural gas, etc.). In addition, the project is consistent with the Specific Plan land use designation and would result in high-density housing that is anticipated in the Specific Plan. Moreover, the Specific Plan anticipates 1,230 new housing units will be added in the Plan area by 2035. This project represents 29 percent of anticipated housing units by 2035.

Indirect population growth occurs when a project creates substantial employment opportunities and/or removes barriers to growth. For example, a project could create thousands of jobs and attract a substantial amount of people to the area. The proposed project is within the Town's limits and proposed urban growth boundary, and substantial development has occurred around the

project site. Additionally, the site is well served by existing transportation facilities because it is located near large thoroughfares such as Windsor River Road and Highway 101. Furthermore, the project is located in an area with existing utility infrastructure to which it would be able to connect. Therefore, the project would not introduce any infrastructure that would induce development beyond site boundaries.

In addition, the project would draw construction workers from the local labor pool because it is relatively small (360 dwelling units) and would not result in long-term population growth or permanent relocation of construction workers. Although the project would introduce new residents to the project area, the implementation of the project would not induce substantial unanticipated population growth within the Town. Impacts would be less than significant.

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

No impact. There is no existing on-site development or structures. This project would develop 360 housing units on a vacant lot that previously supported a mill, resulting in a net increase of 360 housing units. This project would be consistent with the Town's General Plan and Specific Plan, as discussed previously. Therefore, the project would not displace substantial numbers of existing housing. No impact would occur.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No impact. There is no existing development on the project site. No residences would be displaced and this project would result in a net increase of 360 housing units. Therefore, this project would not displace substantial numbers of people, necessitating the construction of replacement of housing elsewhere. No impact would occur.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
14. Public Services *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

Environmental Evaluation

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?

Less than significant impact. Fire protection services are provided to the project site and the Town of Windsor by the Windsor Fire Protection District. The Fire Protection District serves 30,000 people in a 30.75-square-mile area comprising 5 square miles of the Town of Windsor and 25 square miles of surrounding unincorporated area. The closest fire station to the project site is Windsor Fire Protection District Station #2 located approximately 1,200 feet to the southwest at 8600 Windsor Road.

The project site is located in an urban area surrounded by urban land uses and would have three points of road access. As required by the California Fire Code, the project would be required to include site-specific design features such as ensuring appropriate emergency access, and requiring structures to be built with approved building materials. Conformance with this code reduces the risks associated with fire hazards. Therefore, impacts to fire protection services would be less than significant.

b) Police protection?

Less than significant impact. Police protection services are provided to the project to and the Town of Windsor by the Windsor Police Department. The Windsor Police Department is staffed by the Sonoma County Sheriff Department through a contract negotiated between the County and Town of Windsor (Town of Windsor website 2018). The closest police station to the project site is located at 9291 Old Redwood Highway approximately 1,100 feet to the north. Law enforcement services

include but are not limited to patrol duties, traffic enforcement, school resource officer, special event security, group/committee participation, investigations, and a K9 Unit. FCS consulted with the Windsor Police Department in order to determine the project's potential impacts to police protection services. The Department has an established response time standard of 6 to 8 minutes; as of 2016, the average response time is 5 minutes and 40 seconds.

This project would be expected to result in an increased demand for police protection, as it would result in more residents and calls for police service compared with existing conditions. However, the project is consistent with Specific Plan's land use designations and the project's expected population increase is anticipated in the General Plan and Specific Plan. As a result, it is expected that because this project is consistent with the General Plan and Specific Plan that any potential impacts to police protection from this project site and others in the Town would have been evaluated during the preparation of these documents. In addition, according to e-mail correspondence with the Chief of Police the project would not result in a significant adverse effect on response time standards and the need for new or expanded facilities. Therefore, impacts to police protection services would be less than significant.

c) Schools?

Less than significant impact. Windsor Unified School District provides public education for those students in kindergarten through 12th grade who reside in the Town of Windsor. Using the Windsor Unified School District's Facilities Utilization Master Plan student generation rate of 0.46 students per single family unit[4], this project would generate an estimated 165 new students. According to the Master Plan, the District is at or near capacity at almost all schools. Furthermore, the School District is planning to develop new classrooms at Brooks Elementary School, Windsor Oaks Academy, Windsor Middle School, and Windsor High School.

This project would conservatively result in 165 new students. However, this is a worst-case scenario, and even under this scenario, the students would be added over several phases of project construction, allowing the District time to implement strategies to accommodate increased enrollment. As a residential project, the project would be required to pay school impact fees at the time building permits are approved. Pursuant to Government Code Section 65995, payment of school impact fees would be considered full mitigation for school impacts; therefore, project impacts related to schools are considered less than significant.

d) Parks?

Less than significant impact. Implementation of the project may result in increased use of existing parks and recreational facilities that is due to an increase in population. Section 3.15, Recreation, describes town parks and recreational facilities in more detail.

As detailed in the Town of Windsor's Fee Schedule, residential development fees are charged for park and recreation facilities, which are based upon the number of dwelling units and dwelling unit

[4] The Master Plan only identifies student generation for single-family dwelling units; thus, actual student generation by the project would be expected to be lower.

type. In accordance with the General Plan, the project will either contribute land or pay in-lieu park fees. The Specific Plan details that the plan area currently provides 11.14 acres of park land per 1,000 persons, which is well above the 5-acre ratio requirement in the General Plan (see Section 15, Recreation). In addition, it is projected that by 2035, with full buildout of the plan area, the Specific Plan will provide 6.44 acres per 1,000 persons. Furthermore, the project includes a recreation center, pool, and trails along Windsor Creek. As a result, the project site would be well served by recreational facilities. Therefore, impacts would be less than significant.

e) Other public facilities?

Less than significant impact. The Windsor Regional Library serves the communities of Windsor, Larkfield, Wikiup, and Fulton. The library is located at 9291 Old Redwood Highway, approximately 0.4 mile east of the project site. The Sonoma County Library Facilities Master Plan states that at 7,600 square feet, the Windsor Regional Library is significantly smaller than needed for its current population.

The added population from the project would place an additional demand on library services. However, project implementation is not anticipated to generate a demand for new or expanded facilities associated with library services that would result in substantial adverse physical impacts. In addition, the Civic Center Visioning Plan identified the relocation of the Library into a new building as a key component. As a result, there is already a plan to relocate the current library in order to accommodate future population growth. Therefore, project impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
15. Recreation				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Environmental Evaluation

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less than significant impact. The Town of Windsor Parks and Recreation Department maintains 145.8 acres of parkland composed of five community parks totaling 67.5 acres, 14 neighborhood parks totaling 42.5 acres, and 35.8 acres of joint use school site parkland. Regional parks are provided by the Sonoma County Regional Parks District. Regional parks near Windsor include Foothill, Shiloh, and Riverfront Regional Parks, totaling 1,356 acres. The park nearest to the project site is the Windsor Town Green, located approximately 800 feet to the north of the project site. The 4.5-acre Windsor Town Green consists of a play area, a stage, and hosts special events, including a weekly Farmers' Market.

Policy E.3.3 of the General Plan indicates Windsor should provide 5 acres of neighborhood and community parks and special recreation facilities per 1,000 residents. The Town currently meets this goal by providing 5.3 acres per 1,000 residents. This project would result in an increase in the use of parks because it would create an increase in housing units and approximately 1,052 new residents, which could lead to accelerated deterioration of recreational facilities. However, the project is consistent with the Specific Plan land use designation, and, therefore, all impacts to recreation would be accounted for in the Specific Plan. In addition, the project would create more recreational amenities because it proposes a trail along Windsor Creek, a recreation center, and pool. These on-site amenities would reduce the demand for and use of existing public park and recreational facilities.

Therefore, impacts would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Less than significant impact. This project would develop a recreation center, pool, and a trail along Windsor Creek. As a condition of approval, this project will be subject to the Town of Windsor Municipal Code Article 6, Dedications and Reservation, which requires developers to improve all streets, alleys, creek setback areas, trails, and other public easements. Compliance with the Windsor Municipal Code Articles 6 and 8 would ensure that the project's creekside trails and other recreation or park amenities do not have an adverse physical effect on the environment.

As discussed above, this project would not result in a substantial increase in demand for recreational facilities because it would not create a significant population increase. Therefore, this project would not require the expansion or construction of additional recreational facilities. As a result, impacts would be less than significant.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
16. Transportation/Traffic *Would the project:*				
a) 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?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

Environmental Evaluation

The transportation analysis in this section is based on a Transportation Impact Study prepared by TJKM Transportation Consultants, dated September 2018 and provided in Appendix F.

Would the project:

a) 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?

Existing plus Project Conditions

Less than significant impact. Table 22 summarizes the results of the intersection LOS analysis under Existing plus Project conditions, and provides a comparison with Existing Conditions. The results indicate all study intersections would continue to operate acceptably at LOS D or better, while the project would have a negligible effect on average vehicle delay. At all study intersections, the project impact on LOS would be less than significant, based on the Town's LOS threshold of D or better.

Table 22: Intersection LOS—Existing plus Project Conditions

Intersection	Peak Hour	Existing Conditions		Existing Plus Project Conditions	
		LOS[1]	Average Delay[1]	LOS[1]	Average Delay[2]
Starr Rd/Windsor River Rd	AM	C	22.7	C	23.3
	PM	B	10.8	B	10.4
Oak Park St/Windsor River Rd	AM	C	21.9	C	22.2
	PM	C	15.0	C	15.2
Windsor Rd/Windsor River Rd	AM	C	24.3	C	25.2
	PM	B	19.0	C	19.6
Johnson St/Windsor River Rd	AM	D	27.9	D	28.8
	PM	C	20.8	C	21.6
Bell Rd/Windsor River Rd	AM	A	5.9	A	6.3
	PM	A	5.9	A	5.9
Windsor River Rd-Old Redwood Hwy/Conde Ln	AM	C	33.7	C	34.8
	PM	C	30.7	C	30.6
Old Redwood Hwy/US 101 SB Off & On Ramps	AM	C	20.6	C	20.8
	PM	C	20.3	C	20.8
Old Redwood Hwy/US 101 NB Off-Ramp-Lakewood Dr	AM	C	27.4	C	27.5
	PM	D	38.1	D	38.1
Conde Ln/Johnson St	AM	B	13.3	B	13.6
	PM	B	10.0	B	10.0
Bell Rd/Johnson St	AM	B	10.0	B	11.1
	PM	A	9.3	B	10.2

Table 22 (cont.): Intersection LOS—Existing plus Project Conditions

Intersection	Peak Hour	Existing Conditions		Existing Plus Project Conditions	
		LOS[1]	Average Delay[1]	LOS[1]	Average Delay[2]
Bell Rd/Conde Ln	AM	B	12.0	B	12.0
	PM	B	11.3	B	12.1
Windsor Rd/Old Redwood Hwy	AM	A	5.5	A	7.3
	PM	A	6.5	A	6.6
Market St/Old Redwood Hwy	AM	A	6.3	A	6.4
	PM	A	7.5	A	7.5

Notes:
[1] LOS = Level of Service
[2] Average intersection delay expressed in seconds per vehicle.
Source: TJKM 2018.

The project's contribution to left-turn queues is negligible. In cases where existing 95th percentiles queues are accommodated within the available storage capacity, the project's contribution does not cause the queue to exceed the storage capacity. In cases where the existing 95th percentiles queues exceed available storage capacity, the project increases the queue by 10 feet, which is below the 25-foot threshold of significance. At all study intersections, the project contribution to left-turn queues would be less than significant.

Cumulative (Year 2040) plus Project Conditions

This scenario evaluates total traffic volumes and roadway conditions based on Year 2040 conditions. Cumulative traffic volumes were derived from the Town of Windsor 2040 General Plan EIR. The General Plan forecasts of traffic volumes in Year 2040, under the 2040 General Plan, are based on anticipated development, including the proposed project. Therefore, the General Plan forecast was utilized to determine the Cumulative with Project traffic volumes, with turning movement adjustments at intersections closest to the project site. The Cumulative No Project traffic volumes were determined by subtracting the project trips, based on the project trip assignment described in the transportation impact study (see Appendix F).

In addition, the Cumulative with Project traffic forecasts presume pass-through traffic on Bell Road, through the project site, primarily in the northbound direction given the left-turn restriction from Conde Lane to Johnson Street. Therefore, under the Cumulative No Project scenario, the pass-through traffic on Bell Road would travel via Conde Lane to make a left-turn on to westbound Windsor River Road.

Table 23 summarizes the results of the intersection LOS analysis under Cumulative (Year 2040) Conditions, with and without the proposed project. The LOS analysis includes the following planned intersection improvements under both cumulative scenarios:

- Installation of an eastbound left-turn lane on Windsor River Road approaching the intersection with Bell Road and Market Street

The results indicate all study intersections would continue to operate acceptably at LOS D or better under Cumulative (Year 2040) Conditions, with or without the proposed project. The project would have a negligible effect on average vehicle delay. At all study intersections, the project impact on LOS would be less than significant based on the Town's LOS threshold of D or better under Cumulative (Year 2040) Conditions.

Table 23: Cumulative Conditions—Intersection Level of Service Comparison

Intersection	Peak Hour	Cumulative No Project Conditions		Cumulative with Project Conditions	
		LOS[1]	Average Delay[2]	LOS1	Average Delay[2]
Starr Rd/Windsor River Rd	AM	C	17.9	C	18.4
	PM	C	21.5	C	21.8
Oak Park St/Windsor River Rd	AM	C	23.8	C	24.2
	PM	D	30.8	D	31.2
Windsor Rd/Windsor River Rd	AM	C	27.4	C	27.9
	PM	C	22.1	C	22.4
Johnson St/Windsor River Rd	AM	C	24.7	C	25.1
	PM	D	29.3	D	30.1
Bell Rd—Market St/ Windsor River Rd	AM	C	24.3	C[3]	22.6
	PM	C	22.8	C	22.9
Windsor River Rd-Old Redwood Hwy/Conde Ln	AM	C	34.6	C	34.9
	PM	C	33.7	C[3]	33.2
Old Redwood Hwy/US 101 SB Off & On Ramps	AM	C	30.1	C	30.9
	PM	C	25.0	C	25.4
Old Redwood Hwy/ US 101 NB Off-Ramp-Lakewood Dr	AM	C	22.5	C	22.9
	PM	D	42.1	D	47.4
Conde Ln/Johnson St	AM	B	12.7	B[3]	10.9
	PM	B	11.7	B[3]	10.9
Bell Rd/Johnson St	AM	B	11.6	B	11.6
	PM	B	10.3	B	11.8
Bell Rd/Conde Ln	AM	B	11.1	B	11.3
	PM	B	12.2	B	13.0
Windsor Rd/Old Redwood Hwy	AM	A	13.6	A	13.7
	PM	A	9.9	B	10.1

Table 23 (cont.): Cumulative Conditions—Intersection Level of Service Comparison

Intersection	Peak Hour	Cumulative No Project Conditions		Cumulative with Project Conditions	
		LOS[1]	Average Delay[2]	LOS1	Average Delay[2]
Market St/Old Redwood Hwy	AM	B	8.2	A	8.2
	PM	B	10.9	B	10.9

Notes:
[1] LOS = Level of Service
[2] Average intersection delay expressed in seconds per vehicle.
[3] Minor reduction in delay with project reflects traffic reduction at some intersections resulting from the use of Bell Road for through-trips passing through the project site, and/or a reduction in through movements on Windsor River Road at Bell Road-Market Street intersection.
Source: TJKM 2018.

The project's contribution to left-turn queues is negligible. In cases where existing 95th percentiles queues are accommodated within the available storage capacity, the project's contribution does not cause the queue to exceed the storage capacity. In cases where the existing 95th percentiles queues exceed available storage capacity, the project increases the queue by 5 feet, which is below the 25-foot threshold of significance. At all study intersections, the project contribution to left-turn queues would be less than significant.

b) 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?

Less than significant impact. The Sonoma County Transportation Authority (SCTA) is the congestion management agency for Sonoma County. Congestion management is a part of SCTA's Comprehensive Transportation Plan, adopted in 2016, which identifies congested areas and measures to deal with congestion. As described in Impact 16a, the project would have no significant impact on LOS at the study intersections. Therefore, the project would have no impact on congestion management as outlined in the SCTA Comprehensive Transportation Plan.

c) 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?

Less than significant impact. The nearest airport to the project site is the Charles M. Schulz Sonoma County Airport, approximately 1.8 miles to the south. The project site is not located within any of the safety zones established by the Sonoma County Comprehensive Airport Land Use Plan; thus, it is sufficiently far enough away from the airport such that it is not subject to any restrictions on building height. Accordingly, the proposed project would not have the potential to alter air traffic patterns. Impacts would be less than significant.

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

Less than significant impact. The project does not contain any features that would have the potential to increase hazards to vehicles. As described under Impact 16a, the project would have no significant impact on left-turn queues at the study intersections. The project would provide adequate access to the project site, and roads would not have any features, such as sharp curves, that would pose a potential safety hazard. No farms, industrial activities, or other land uses incompatible with the proposed residential development are in the vicinity. Project impacts would be less than significant.

e) Result in inadequate emergency access?

No impact. As described in Section 8, Hazards and Hazardous Materials, the project proposes to connect Bell Road where it terminates after Johnson Street to the intersection of Bell Road and Grayson Way, which would facilitate emergency vehicle access to the project site. Adequate access would be provided to the residential from driveways off Bell Road and Bill Beedie Way. The project would have no impact on emergency access.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less than significant impact. As previously described, the project site is located within 1,500 feet of two bus stops along Route 60, which would provide access to other connections as well as to the future SMART station proposed for Windsor. The project proposes to develop a creekside trail that would be consistent with the proposed Windsor Creek Class II bikeway in the Town's Bicycle and Pedestrian Plan. The project also would provide one pedestrian bridge proposed in the Bicycle and Pedestrian Plan, as well as the Downtown Specific Plan. The project would have no adverse impact on adopted policies, plans, or programs regarding alternative modes of transportation to motor vehicles.

Mitigation Measures

None.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
17. Utilities and Service Systems *Would the project:*				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) 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?	☐	☒	☐	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

Environmental Evaluation

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than significant impact. The project is located within the jurisdiction of the North Coast RWQCB (Region 1). The current average daily dry weather flow treated at the Town's Wastewater Treatment Plan (WWTP) is 1.4 million gallons per day (mgd), while the permitted capacity is 1.6 mgd, leaving excess capacity of 0.2 mgd. Based on a Water Master Plan Update prepared in 2010, average household water use in the Town of Windsor is estimated to be 319 gallons per day per dwelling unit (RMC Water and Environment 2011). Based on this amount, the estimated water usage of the 360 residential units proposed by the project would be 114,840 gallons per day, or approximately 128.6

acre-feet per year (afy). This amount is likely conservative and would be a worst-case scenario because the proposed residences consist mainly of smaller one- and two-bedroom apartments, which would generate less wastewater than the average household. If the project were to produce wastewater equivalent to the potable water daily demand, the project would comprise only approximately 47 percent of the available average daily dry weather capacity. As a result of the project, there would still remain 0.1 mgd in capacity for average daily dry weather flow. However, the Master Trunk Sewer Plan (April 2000) details sewer capacity improvements to serve the Town of Windsor at full buildout. These capacity improvements would accommodate the project and any future projects in the Town of Windsor.

In addition, this project is consistent with the 2040 General Plan and Station Area/Downtown Specific Plan, and all project-generated wastewater would be anticipated in future WWTP improvement projects. Furthermore, the Town's Sanitary Sewer Master Plan includes capacity enhancement measures that would identify and plan for the needed short and long-term capital improvements. These improvements would increase capacity of the sanitary sewer system through specific design measures. Therefore, the project would not exceed wastewater treatment requirements of the applicable RWQCB and impacts would be less than significant.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than significant impact. Implementation of the project would result in the demand for water and the generation of wastewater. As noted under Impact 17a, excess capacity exists in the Town's wastewater treatment plant to accommodate project wastewater. The project proposes to extend water and sewer lines onto the project site along the extended Bell Road and Bill Beedie Way. The project would connect to existing water and sewer lines beneath Bell Road and Bill Beedie Way to the north. Connections also would be made to water and sewer lines south of Windsor Creek via the proposed vehicular bridge. The existing well on APN 164-020-007 would be abandoned in accordance with County regulations once the project applicant acquires ownership of the parcel from the Windsor Water District.

As discussed under Impact 17d below, the Town of Windsor would have adequate water supplies to service the project and the Town until 2040. Additionally, a connection fee would be charged to the new development to aid in funding the costs of expansion of the water and wastewater systems. Therefore, implementation of the project would not result in the need for new water or wastewater treatment facilities or expansion of existing water and wastewater treatment facilities. As a result, impacts would be less than significant.

c) 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?

Less than significant impact with mitigation incorporated. The Town of Windsor does not operate a separate drainage system that treats stormwater. Instead, the Town relies on implementing policies in the General Plan. Included in the General Plan policies, the Town shall maintain and implement a Storm Water Management Plan and provide requirements for Low Impact Development techniques

in order to reduce the release of pollutants into stormwater from development and construction. In addition, an Initial Storm Water LID Submittal was prepared for this project to detail the permanent stormwater BMPs that would be included with development as required by the Low Impact Development Technical Design Manual.

Currently, stormwater on the project site either percolates into the soil or drains into Windsor Creek. Development of the project would result in more impervious surfaces compared to existing conditions and as a result would increase stormwater. However, the project proposes to integrate a series of bioretention areas and permeable pavements that capture site runoff in accordance with the LID Technical Design Manual. In addition, stormwater for large storm events would be routed to a detention basin with an outlet that would limit the 100-year post development peak stormwater flow rate to the pre-development condition.

The Town of Windsor will condition the project to demonstrate that there would be no net increase in surface elevation adjacent to or at any point downstream or upstream of the project site between pre-development conditions and post-development conditions for any storm event with a recurrence interval of 100 years or less. To assist in meeting this requirement, the condition also requires that the project provide adequate underground storm drain capacity across the project site to accommodate 10-year flows under conditions of full development of the project site and all upstream areas draining to the project site in accordance with the most recent adoption of the Town of Windsor General Plan. The condition further requires that the project provide adequate underground and overland flow capacity across the project site to accommodate 100-year flows under conditions of full development of the project site and all upstream areas draining to the project site in accordance with the most recent adoption of the Town of Windsor General Plan, without flooding of structures or unacceptable flooding or damage to other facilities, as determined by the Town Engineer. All design, analyses, and calculations would be subject to review and approval by the Town Engineer to ensure that the project design is in compliance with these requirements. This condition is reflected in Mitigation Measure HYD-1. Therefore, the project would not worsen the existing condition, and project impacts would be less than significant.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than significant impact. The Town has access to 5,625 afy of water under average annual conditions. Projected water use in 2040 is 4,809 afy, while future water storage is predicted to be 6,427 afy. Based on these projections in the 2015 Town of Windsor Urban Water Management Plan, there are sufficient water supplies to serve the Town through the year 2040. The Urban Water Management Plan includes consideration of 2040 General Plan build out, such as the development of the project site. In addition, the Town of Windsor 2040 General Plan goals and policies require new development to have water supply and infrastructure in place in order to be approved. Therefore, the Town would have adequate water supplies to accommodate the project without the need for new or expanded entitlements. Project impacts would be less than significant.

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

Less than significant impact. As described under Impact 17a, the WWTP would have adequate capacity to accommodate the anticipated wastewater that would be generated by the project and the Town. Impacts would be less than significant.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than significant impact. The proposed project would be expected to increase demand for solid waste services. Using the Cal Recycle solid waste generation rate of 4 pounds per dwelling unit per day for multi-family residential use, with 360 dwelling units the project would generate approximately 1,440 pounds per day, or 262.8 tons per year. The Town of Windsor generates 10,575 tons of solid waste per year, or 29 tons per day. As a result, this project would increase the Town of Windsor's solid waste generation by approximately 2.4 percent compared to the existing daily and yearly tonnage. This is an insignificant amount of solid waste generation, because the Town of Windsor as whole represents 1 percent of the Central Disposal Site's daily tonnage received. In addition, the Central Disposal Site has a permitted daily capacity of 2,500 tons of solid waste and is currently receiving 1,250 tons per day from all its contracted municipalities.

As stated above, the Central Disposal Site has a remaining capacity of 9.07 million cubic yards, which is adequate to provide service to Windsor for the remaining duration of the 2040 General Plan. Furthermore, the 2040 General Plan goals and policies would promote waste diversion and ensure sufficient landfill capacity is available to accommodate the estimated increase in solid waste generation. Therefore, this project would be served by a landfill with sufficient permitted capacity and impacts would be less than significant.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

No impact. Solid waste disposal would follow the requirements of the franchised waste hauler, Sonoma County Resource Recovery, which must adhere to federal, state, and local statutes and regulations related to the collection of solid waste. The project would comply with all state and local waste diversion requirements including Town of Windsor Zoning Ordinance Section 27.20.080 regarding Solid Waste and Recyclable Materials Storage and the California Solid Waste Reuse and Recycling Access Act (Public Resources Code Sections 42900 through 42911). Because solid waste disposal would be compliance with federal, state, and local statutes and regulations, no impact would occur.

Mitigation Measures

Implement Mitigation Measure HYD-1.

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

Environmental Evaluation

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

Less than significant impact with mitigation incorporated. The proposed project may result in impacts associated with biological and cultural resources that would be significant if left unmitigated. Implementation of mitigation measures as outlined in the biological resources and cultural resources sections of this IS/MND would fully mitigate all potential impacts on these resources to levels that are less than significant.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than significant impact with mitigation incorporated. Implementation of mitigation as outlined in this IS/MND would reduce all potentially significant impacts to less than significant. Given the project's size and impacts with associated mitigation measures, the incremental effects of this project are not considerable relative to the effects of past, current, and probable future projects. Therefore, the proposed project would not result in cumulatively considerable impacts, and impacts would be less than significant.

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

Less than significant impact with mitigation incorporated. As described throughout the preceding checklist portion of this IS/MND, the project would not have any substantial environmental effects on human beings, either directly or indirectly. All impacts identified throughout this document either do not require mitigation or would be mitigated to levels that are less than significant. The proposed mitigation measures, once implemented, would ensure that no substantial adverse effects on human beings would result from the project. Therefore, impacts would be less than significant with mitigation.

Mitigation Measures

Implement Mitigation Measures AIR-1, AIR-2, BIO-1, BIO-2, BIO-3, BIO-4, CUL-1, CUL-2, CUL-3, CUL-4, GEO-1, NOI-1, and NOI-2.

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