

Initial Study North Entry Area Plan City of Healdsburg, Sonoma County, California



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ACRONYMS AND ABBREVIATIONS

µg/m ³	micrograms per cubic meter
°F	degrees Fahrenheit
°C	degrees Celsius (Centigrade)
ALUP	Airport Land Use Commission
Cal OES	California Governor’s Office of Emergency Services
CALUP	comprehensive airport land use plan
CARB	California Air Resources Board
Caltrans	California Department of Transportation
CDFW	California Department of Fish and Game
CEQA	California Environmental Quality Act
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
EIR	Environmental impact report
FEMA	Federal Emergency Management Agency
FRA	Federal Railroad Administration
GHG	greenhouse gas
IS	Initial Study
mph	miles per hour
MU	Mixed-Use
NAHC	Native American Heritage Commission
NCRA	North Coast Railroad Authority
MND	mitigated negative declaration
NCRA	North Coast Railroad Authority
NOAM	Naturally Occurring Asbestos Minerals
NSAPCD	North Sonoma County Air Pollution Control District
PM	particulate matter
RWQCB	Regional Water Quality Control Board
SHPO	State Historic Office of Preservation
SMART	Sonoma-Marin Area Rail Transit District
SUSWMP	Standard Urban Storm Water Mitigation Plan
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
USACE	United States Army Corps of Engineers
VOC	volatile organic compounds

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SECTION 1: INTRODUCTION

1.1 - Overview and Purpose

The Healdsburg 2030 General Plan identifies a total of five areas within the City that warrant further study beyond the elements contained in the General Plan (at the time of its adoption in 2009). These special study areas were selected based on unique locations or functions in the City. One of these five study areas is the North Entry Study Area, which encompasses the vacant 32.17-acre property (a 30.16-acre portion currently owned by Comstock Healdsburg LLC, referred to as the “Comstock property”) on the west side of Healdsburg Avenue, Healdsburg Avenue from the northern City boundary south to Foss Creek, and approximately 256 acres of land immediately to the east of identified portion of Healdsburg Avenue.

The City is preparing the North Entry Area Plan (referred herein as the “proposed plan”), as an amendment to the General Plan land use element and policies, to establish more specific guiding principles and a design framework for development of the 30.16-acre Comstock property within the proposed plan study area, located on the west side of Healdsburg Avenue. The primary purpose is to create a long-term vision for development that will realize the property’s potential consistent with the Healdsburg 2030 General Plan. The proposed plan is considered an “area plan,” in that it does not meet the content requirement of a Specific Plan under California state planning law. It is a regulatory document that amends the general plan and does provide clear guidance to City decision-makers and members of the public when considering future site-specific development projects in the plan area.

The privately-owned 30.16-acre Comstock property is located within the plan area. The property consists of four vacant lots within the proposed plan area boundary. The plan area also encompasses an existing railroad right-of-way, state owned lands, and public streets (referred to herein as “the plan area”). Following adoption of the proposed North Entry Area Plan, Comstock Healdsburg LLC intends to develop its property with mixed use development. The plan area is an important locational gateway that provides land use transition from Alexander Valley agricultural uses to Healdsburg town uses. It is anticipated that the proposed plan will also be relied upon by the City when considering a specific proposal by Comstock Healdsburg LLC to develop the plan area in phases with senior residential, family residential, hotel, restaurant, commercial office, and public plaza uses.

The purpose of this Initial Study (IS) is to identify potential environmental impacts from implementation of the proposed plan within the City of Healdsburg, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Healdsburg (City), which has discretionary authority over the proposed plan, is the Lead Agency in the preparation of this IS and additional environmental review documentation required for the proposed plan. This document is used to determine the level of environmental analysis required within the pending Environmental Impact Report (EIR) 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 plan area location and the characteristics of the proposed plan. Section 2 includes an environmental checklist giving an overview of the list of potential impacts that may result from plan implementation.

The remainder of this section provides a brief description of the plan area location and the characteristics of the proposed plan. Section 2 includes an environmental checklist giving an overview of the list of potential impacts that may result from project implementation.

1.2 - Plan Area Location and Properties Ownership

The plan area primarily encompasses 32.17 acres located at 16977 Healdsburg Avenue in the City of Healdsburg, Sonoma County, California (Exhibit 1). The plan area is located within the northern Healdsburg city limit between U.S. Highway 101 and Healdsburg Avenue. The plan area consists of the following:

- Three continuous parcels owned by Comstock Healdsburg LLC, totaling 30.16 acres (APN 091-060-022, 091-060-019, 091-060-009) located between U.S. Highway 101 and Healdsburg Avenue. These parcels are referred to as the “Quaker Hill site” and “Quaker Hill property” in the City’s General Plan because these parcels were owned by Quaker Hill Associates at the time the General Plan was adopted. The parcels were purchased by Comstock Healdsburg, LLC in 2016. For the purposes of this initial study, these parcels are referred to as the “Comstock property” to accurately reflect the change in the property’s ownership.
- A portion of the North Coast Rail Authority (NCRA) right-of-way (APN 091-060-033), which includes a freight rail line and alignment for future Sonoma-Marin Rail Transit (SMART) rail service.
- Property between the NCRA railway right-of-way and Healdsburg Avenue that includes a 2.17-acre parcel of the Comstock Healdsburg, LLC parcel (APN 091-060-025) and 0.15-acre parcel owned by the State of California (APN 091-060-026). The Comstock Healdsburg, LLC parcel extends the majority length of the plan area between the railway right-of-way and Healdsburg Avenue. An existing pipeline easement also runs along the State-owned parcel as well as a portion of the central portion of the plan area. The State of California parcel is located adjacent to and north of the Comstock property.
- A portion of Healdsburg Avenue, given that the State-owned parcel is located adjacent to and north of the Comstock property and extends to the centerline of Healdsburg Avenue along the frontage of the Comstock property.

The proposed plan area is located on the Healdsburg, California, United States Geological Survey 7.5-minute topographic quadrangle map, Township 9 North, Range 9 West, Section 8 (Latitude 38°61’04” North; Longitude 122°86’91” West).

1.2.1 - Surrounding Land Uses

Immediate surrounding land uses to the plan area include U.S. Highway 101 to the west, Healdsburg Avenue to the east, a hillside parcel privately owned by Lytton Rancheria of California to the north,

and Foss Creek and a vacant parcel owned by SIMI Winery to the south (Exhibit 2). Farther west and east of the plan area are agricultural areas, and farther south of the plan area are residential uses.

1.2.2 - General Plan Land Use Designation and Zoning

The City's General Plan designates the plan area as mixed-use development (MU 10-16 units per acre) land use. The Zoning Code establishes the plan area as Mixed Use (MU) zone district.

1.3 - Plan Area Background

In 2004, the vacant 30.16-acre Comstock property within the plan area was improved for potential development. Improvements consisted of demolition of a former lumber mill facility buildings, contaminated soil remediation, grading, drainage updates, and wetland mitigation. The property was mass graded to establish positive sheet flow drainage toward Healdsburg Avenue, and included an on-site collection, retention, and a discharge drainage system was constructed to improve the overall quality of stormwater runoff. The ditch along the western side of the proposed plan area was realigned to a location closer to the toe of U.S. Highway 101 embankment slope. The flat portion of the property was enlarged to the north, and the ditches along this toe of the hill to the north were realigned, creating approximately 18 acres of level land area. Realigned ditches along the toes of the western and northern slopes of the property were planted with native vegetation to mitigate impacts from previous grading activities performed within the plan area.

A ditch along the eastern side of the Comstock property and parallel to the railroad line was re-sloped to reduce bank erosion. Drainage now sheet flows southeastward towards the drainage ditch, which then flows into a 0.7-acre stormwater detention basin at the southern end of the Comstock property and plan area. The basin was sized to handle smaller storm events and used to filter sediments and contaminants, thus improving the quality of runoff from the plan area into Foss Creek. The City of Healdsburg Planning and Building Division issued a permit for the site demolition and regrading work which was completed and inspected in January 2005.

Concurrently, the North Coast Railroad Authority (NCRA) approved an increase in the width of the proposed plan area's existing private road-railroad crossing easement from 20 feet to 70 feet in order to consolidate access for vehicular, pedestrians, and utilities to the plan area at one location and to accommodate future improvements for the roadway. The Public Utilities Commission Resolution TRD-258 grants an extension to October 23, 2018 of its Decision 10-09-034 (dated September 23, 2010) to permit conversion of the private at-grade crossing to a public crossing (CPUC Crossing No. 005-70.85, US DOT No. 968011 N). The City of Healdsburg has entered into an agreement to accept the crossing once the property owner completes installation of approved crossing improvements.

1.4 - Existing Plan Area Characteristics

The City considers the proposed plan area to be a transition area between the rural character of the Alexander Valley wine region to the north and the urban character of downtown Healdsburg two miles to the south. The plan area is located within the low hills that define the western edge of Alexander Valley, generally flanked by northwest-trending mountain ranges. The plan area is located

near the Parkland Farms residential neighborhood to the southeast and the proposed Saggio Hills (now known as “Montage Healdsburg”) development immediately east of Healdsburg Avenue. Local water bodies include Lytton Lake to the northwest and Foss Creek to the south of the plan area.

The irregularly-shaped plan area is largely vacant land and contains the railroad right of way, drainage improvements, and a portion of Healdsburg Avenue. The majority of the plan area is located on relatively flat, grass-covered land that was previously graded. The northern and southwestern edges of the plan area consist of sloping hillsides with woodland vegetation. Existing drainage on-site includes swales at the perimeter of the regraded land within the Comstock property, and a water quality basin in the southeast. There are two active faults within the plan area that were identified in the environmental review conducted in 2004 for the site remediation work associated with a former lumber mill on the Comstock property. Both faults run diagonally from northwest to southeast, one on the northern portion of the plan area and the other on the southern portion of the plan area.

The Northwestern Pacific Railroad line traverses the proposed plan area from north to south along an 80-foot wide right-of-way. The right-of-way is located along the eastern portion of the plan area and roughly parallel to Healdsburg Avenue. The Northwestern Pacific Railroad line was constructed in 1889 when it was extended northward from Healdsburg to Ukiah. The Sonoma-Marin Area Rail Transit (SMART) District, created by the State Legislature in 2003, obtained a perpetual passenger service easement over the railroad line. Passenger rail services are planned along this line through the plan area in the future.

1.5 - Proposed Plan Description

1.5.1 - Land Uses

The proposed plan contemplates the future construction and operation of a mixed-use community that would include residential and nonresidential land uses. Table 1 summarizes the proposed plan.

Table 1: Proposed Plan Area Land Use Type and Buildout Assumptions

Land Use Type	Buildout Assumption
Residential ¹	290 units ³
Nonresidential (Retail/Services/Restaurant) ²	200,000 gross square feet (gsf) ⁴
<p>Notes:</p> <p>¹ Includes residential mixed use, multi-family housing (including families, singles, workforce and seniors), and residential care facilities.</p> <p>² Includes grocery market or specialty food sales (e.g., 3,500 gsf or less), other retail (clothing, art, home décor, flowers, books, etc.), personal services (daycare, dry cleaning, fitness, massage, pet grooming, etc.), business support services and offices, instructional services, medical services and visitor lodging, restaurant and café, and similar uses, and does not include large-box retail stores or regional retailer shopping centers.</p> <p>³ Roughly equivalent to 16 units per acre based on 18 acres of developable land.</p> <p>⁴ Roughly equivalent to 0.25 FAR based on 18 acres of developable land.</p>	



Source: Census 2000 Data, The CaSIL

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Exhibit 1 Regional Location Map

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Source: bing Aerial Imagery.

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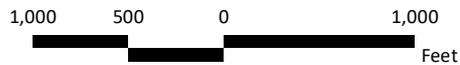


Exhibit 2
Local Vicinity Map
Aerial Base

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An average of 1,500 gross square feet is assumed for the proposed residential units to account for a range of unit sizes. Thus, total planned building area of up to 435,000 gross square feet of residential and 200,000 gross square feet of nonresidential would constitute the anticipated 635,000-gross-square-foot development envelope. Development would be located on approximately 18 acres of the Comstock property and would include multi-story buildings up to 50 feet in height. Buildings near the rail right-of-way and Healdsburg Avenue frontage are anticipated to maintain lower heights of not more than 35 feet, with taller heights increasing toward the hillside portions of the plan area. The overall development footprint would allow for approximately 12 acres of open and undeveloped land to remain within the developable property.

The proposed plan land uses are consistent with the land use types established for the Mixed-Use zoning district.

Circulation and Access

Vehicle

Public vehicle access to the private mixed-use property within the plan area would be from Healdsburg Avenue via a single entry point just southwest of Passalacqua Road. The entry point would cross a railroad grade crossing that enables access to Healdsburg Avenue. In 2010, the City entered into an agreement with the property owners and the California Public Utilities Commission granted authority to convert the existing private crossing into a public crossing with improvements. The agreement is valid through October 23, 2018. If construction is not completed prior to the agreement's expiration, the property owner would need to secure a new crossing agreement. Surface parking would be required to be provide on-site to serve future development in the plan area. The plan will include recommendations for development of an internal street circulation system to serve development within the plan area. A secondary emergency vehicle access will be required to be obtained by the developer in order to achieve full buildout anticipated under the plan.

Rail

The plan area would not be serviced by rail.

Bicycle and Pedestrian

The proposed plan would promote the City's efforts to maximize bicycle and pedestrian connections to the existing bicycle and pedestrian system. Complementary to the City's Complete Streets program, the proposed plan would incorporate connections to the Foss Creek Pathway, Foss Creek Trail, and the City's sidewalk system.

Infrastructure

Water and Wastewater

The City of Healdsburg owns and operates sewage collection, treatment, and disposal facilities that would serve the plan area. The City's wastewater treatment plant (WWTP) is located approximately one mile southwest of the city limits, on Foreman Lane just south of the confluence of Dry Creek and the Russian River. The City of Healdsburg's water system is supplied from three well fields: one on Dry Creek with three operational wells and two on the Russian River with eight operational wells. The plan

area is located within the City’s water and wastewater service areas. Future proposed land use development projects would connect to existing infrastructure located beneath Healdsburg Avenue.

Stormwater

The plan area would have a private on-site drainage system. The drainage system would be a combination of an existing drainage swale around the perimeter of the plan area and a storm drain system that would collect stormwater from paved surfaces on-site. The system will be a combination of the existing system and other methods to meet State Water Quality standards.

Electricity

Existing electric utility poles along the west side of Healdsburg Avenue would be undergrounded as development occurs. The City will provide electric service by connecting to existing facilities within Healdsburg Avenue and coordinated with Saggio Hills Joint Trench Plan prepared by Nor-Coast Utility Design. Utility lines within the plan area would be installed underground. Existing services would be upgraded and replaced as part of the proposed development and coordinated with the Montage Healdsburg development public improvement plans.

Natural Gas

The plan area currently has public utility services including gas service provided by Pacific Gas & Electric. Future development would connect to an existing gas line beneath Healdsburg Avenue. Existing services would be upgraded and replaced as part of the proposed development and coordinated with the Montage Healdsburg development public improvement plan.

Landscaping, Signage, and Lighting

Landscaping

Landscaping elements would be compatible with the design, scale, and placement of buildings as well as the surrounding area, based upon the historic agricultural and rural character of the north entry area. The plan area would also include a 35-foot landscaping easement along Healdsburg Avenue that is consistent or compliments the proposed landscaping along the east side of Healdsburg Avenue associated with the Saggio Hills Area Plan.

Signage

Site signage throughout the plan area would be provided in compliance with City ordinances and design guidelines in the proposed plan.

Lighting

Exterior site lighting throughout the plan area would provide for safety and security to residents, visitors, and employees. Lighting will comply with City ordinances and night sky requirements.

Phasing and Construction

Construction of future land use development projects is expected to occur over an estimated 12-month period. Construction activities would include typical phases such as site preparation and grading, building construction, paving and architectural coating. For the purposes of this Initial Study, construction is conservatively assumed to begin in January 2020 and be completed in January 2021.

1.6 - Cumulative Projects

Buildout of the 2030 General Plan (adopted 2009) identified a citywide potential for construction of up to 872 additional residential units, including approximately 578 single-family units, 241 multi-family units, industrial development of 995,975 square feet, 339 hotel rooms, and 52 mixed use units.¹ Based on the General Plan, population would increase from 12,200 (2005) to 14,468 at buildout, assuming all 872 residential units are constructed and occupied. The General Plan buildout also includes commercial, retail, mixed use, and office space (507,508 square feet, 551,683 square feet, 15,000 square feet, and 20,000 square feet, respectively, or 1,014,111 square feet total).

1.7 - Required Approvals

The following discretionary actions are required by the Healdsburg City Council for approval of the proposed North Entry Area Plan:

- EIR Certification
- Adoption (by resolution) of North Entry Area Plan General Plan Amendment
- Approval of Zoning Code amendments (if any) necessary to conform to the General Plan Amendment

Subsequent development of the Comstock property would be required to comply with the proposed plan. Development of this property would include the following additional discretionary actions:

- Approval of Design Review and Conditional Use Permit entitlements from the City of Healdsburg.
- Approval of encroachment permits from the City of Healdsburg for utility infrastructure and public improvements.
- Installation of approved at-grade crossing improvements to provide public access for the property. An extension of time for installation of the crossing improvements may be required to be obtained from the CPUC and NCRA.
- Approval of a new emergency vehicle at-grade crossing from the CPUC and NCRA across the railroad, between Healdsburg Avenue and developable portion of the Comstock property.

1.8 - Intended Uses of this Document

This Initial Study has been prepared to determine the appropriate scope and level of detail required for completing the environmental review analysis of the proposed plan's EIR. This document will also serve as a basis for soliciting comments and input from members of the public and public agencies regarding the proposed plan. The City will circulate the Initial Study for a minimum of 30 days and hold a public scoping meeting on June 28, 2018. During the public period, comments concerning the analysis contained in the Initial Study should be sent to:

¹ City of Healdsburg General Plan Environmental Impact Report (SCH 2007082030), Section IV.J: Land Use and Planning, Table IV.J.3.

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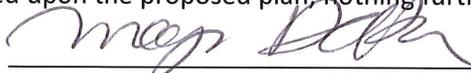
SECTION 2: ENVIRONMENTAL CHECKLIST AND ENVIRONMENTAL EVALUATION

Environmental Factors Potentially Affected			
The environmental factors checked below would be potentially affected by the proposed plan, involving at least one impact that is a “Potentially Significant Impact” and not also already identified as mitigable as indicated by the checklist on the following pages.			
<input checked="" type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forestry Resources	<input checked="" type="checkbox"/> Air Quality	
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Geology and Soils	
<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards and Hazardous Materials	<input type="checkbox"/> Hydrology and Water Quality	
<input type="checkbox"/> Land Use and Planning	<input type="checkbox"/> Mineral Resources	<input checked="" type="checkbox"/> Noise	
<input type="checkbox"/> Population and Housing	<input type="checkbox"/> Public Services	<input type="checkbox"/> Recreation	
<input checked="" type="checkbox"/> Transportation/Traffic	<input type="checkbox"/> Utilities and Services Systems	<input type="checkbox"/> Mandatory Findings of Significance	

Environmental Determination

On the basis of this initial evaluation:

- I find that the proposed plan COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed plan 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 plan MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed plan 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 plan 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 plan, nothing further is required.

Date: 6/21/18 Signed: 

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

Existing Conditions

Primary scenic vistas within the City area consist of wooded ridges, hillsides, and the Russian River². The City has designated several ridgelines in the General Plan as scenic resources. Specifically, Fitch Mountain, to the east of the plan area, is a scenic resource. Another scenic resource, the Russian River, is primarily visible from bridges and parks that front the river, and river views are relatively limited within the City. The City and Sonoma County have designated the portion of U.S. Highway 101 in the surrounding area, located approximately 140 feet west of the plan area, as a scenic corridor³. The City has also designated Healdsburg Avenue as scenic corridor.⁴

In the CEQA context, light is nighttime illumination that stimulates sight and makes things visible, and glare is difficulty seeing in the presence of bright light such as direct or reflected sunlight. The primary sources of nighttime light in the surrounding area are from vehicle headlights traveling along U.S. Highway 101, Healdsburg Avenue, and other surrounding roadways. There are minimal streetlights along these proximate roadway corridors and few buildings with outdoor security lighting in the surrounding area. In addition, there are no large reflective surfaces associated with buildings in the surrounding area that contribute daytime glare within the plan area.

² City of Healdsburg General Plan 2030, IV.B-1.

³ City of Healdsburg General Plan 2030. NR-C-7.

⁴ *Ibid.*

Environmental Evaluation

Would the project:

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

Potentially significant impact. The plan area is composed of mainly flat areas rising slightly to the northwest. The plan area is located near Healdsburg scenic resources (two major scenic ridgelines located to the east of the plan area) and bordered by two scenic roadways U.S. Highway 101 on the west and Healdsburg Avenue on the east. In addition, a portion of Healdsburg Avenue is located within the plan area. The proposed plan would include a range of new land uses with varying building heights. Implementation of the proposed plan would alter the character of existing scenic vistas available from publicly accessible locations.

General Plan goals and policies related to scenic vistas provide direction on how future development should account for the City's scenic resources. The proposed plan would provide guidance for development of the plan area in accordance with the applicable land use policies and standards. Policy NR-C-7 provides that viewsheds along scenic highways, roads, and streets shall be protected and enhanced. In addition, Policies LU-A-6, LU-C-1, T-A-14, PS-H-7, NR-B-2, and NR-C-1 through NR-C-6 apply to ensure that land use respects natural constraints and conditions, future development projects are aesthetically pleasing, open space and natural settings are protected and enhanced, and scenic resources are protected from obstruction from development by requiring a visibility analysis for new development. This would include new development along the following roadway segments, declared as scenic roads by Policy NR-C-7, for purposes of General Plan and City land use regulations:

- U.S. Highway 101—entire length within the plan area
- Healdsburg Avenue—North of Grove Street

Buildout under the proposed plan could obscure important sightlines from scenic roads (U.S. Highway 101 and Healdsburg Avenue) to scenic resources (Fitch Mountain as well as other hillsides and wooded ridges) by adding new buildings, landscaping, and signs adjacent to these scenic roads. This is a potentially significant scenic vistas impact and, thus, will be further evaluated in the EIR.

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

No impact. According to the California Department of Transportation (Caltrans) Scenic Highway Mapping System,⁵ there are no officially State-designated or eligible scenic highways within the City limits. Therefore, no impact would occur with regard to scenic resources within a State scenic highway, and such impacts will not be addressed further in the EIR.

⁵ California Department of Transportation (Caltrans). 2018. California Scenic Highway Mapping System. Website: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm. Accessed: March 29.

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

Potentially significant impact. The plan area is visible from U.S. Highway 101, a City- and County-designated scenic corridor. Looking towards the plan area from U.S. Highway 101, the existing area provides northbound drivers with a clear view down to the plan area and surrounding areas. The plan area is located along Healdsburg Avenue and has a sense of enclosure on three sides because of a steep grassland/woodland hillside to the north, an approximate 45-foot-high embankment to the west, and moderately sloped hillsides to the south.

The General Plan EIR examined the potential for allowable development to degrade the City’s visual character. General Plan policies and the City’s zoning ordinance would apply to new development in order to reduce impacts. Policies T-A-2, PS-H-7, NR-B-2, NR-B-6, and NR-C-1 through NR-C-8 will protect the City’s open space, natural and scenic resources, viewsheds from City-designated scenic roadways, and mature trees from development and encroachment, and require new development to plant large-scale trees to match the surrounding landscape. In addition, General Plan policies LU-A-1 and LU-C-1 ensure that developments respect natural constraints and conditions within the city limit/Urban Growth Boundary. Article 26 of the City’s Zoning Ordinance not only promotes the maintenance of the City’s natural resources through design review of proposed developments, but also requires that developments adhere to all applicable policies and standards found in the City’s General Plan and Zoning Ordinance.

The plan area is currently undeveloped and the developable area is comprised largely of a flat graded area. The proposed plan includes multistory building components between U.S. Highway 101 and Healdsburg Avenue. The existing visual character of the plan area would change, altering the visual experience of travelers along these scenic corridors in northern Healdsburg. This is a potentially significant visual character impact and thus will be further evaluated in the EIR.

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

Potentially significant impact. The plan area is located in an undeveloped portion of the City. Residential and commercial development in accordance with the proposed plan would potentially result in significant new sources of light and glare affecting daytime and nighttime views. The plan area is located within an area (the “North Entry Study Area”⁶) for which the City General Plan requires development of a further plan. The General Plan requires that such a plan identify street improvements along the northern portion of Healdsburg Avenue, including lighting.

The proposed plan contemplates the construction of new buildings, and, as such, new sources of lighting would be created. Redevelopment of the plan area with large and tall buildings would also introduce new sources of glare in the form of reflective glass and metal elements. Additional light and glare could also result from increased automobile headlights generated by increased roadway traffic. Consequently, the effect of new sources of lighting and glare is a potentially significant impact and thus will be further evaluated in the EIR.

⁶ City of Healdsburg General Plan 2030. 2 Land Use page: 2-11.

Mitigation Measures

No mitigation measures have been identified at this time. Impacts associated with this topic will be further evaluated and, if necessary, mitigated in the EIR.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. As such, implementation of the aforementioned identified cumulative projects in combination with the proposed plan could result in significant impacts on a scenic vista, existing visual character, and light and glare. Adherence to General Plan goals and policies related to scenic vistas as well as implementation of project-specific design recommendations in the proposed plan would reduce potential aesthetics impacts, however, this cumulative topic will be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>2. Agriculture and Forestry Resources <i>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:</i></p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>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))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>d) Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Conditions

The plan area is adjacent to U.S. Highway 101 and residential development to the south and east. The area surrounding the plan area is mapped by the California Department of Conservation Farmland Mapping and Monitoring Program as largely “Other Land” or “Grazing Land.” A small area immediately to the northeast of the plan area (across Healdsburg Avenue) is mapped “Farmland of Statewide Importance” and “Unique Farmland” as well as an area to the west (across Highway 101) mapped as “Unique Farmland.”

The plan area is not in agricultural use and is mapped by the California Department of Conservation Farmland Mapping and Monitoring Program as “Urban and Built-Up Land.” In addition, the plan area does not contain forested land and is designated “Mixed Use” by the Healdsburg General Plan.

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 California Department of Conservation Farmland Mapping and Monitoring Program mapped the plan area as “Urban and Built-Up Land,” which is a non-agricultural land use designation. Thus, future development within the proposed plan area would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur. This topic will not be further addressed in the EIR.

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

No impact. The plan area consists of parcels that are designated Mixed Use land use by the General Plan, which is a non-agricultural zoning designation and considered not suitable or appropriate for primary agricultural activities. Additionally, the land within the plan area is not in agricultural use and, therefore, not encumbered by a Williamson Act contract. These conditions preclude the possibility of conflicts with agricultural zoning or a Williamson Act contract. No impact would occur. This topic will not be further addressed in the EIR.

- 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 plan area is designated Mixed Use, which is a non-forest zoning designation. Additionally, the plan area does not contain forest or timberland. These conditions preclude the possibility of conflicts with forest or timberland zoning. No impact would occur. This topic will not be further addressed in the EIR.

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

No Impact. The proposed plan area does not contain any forestland. This precludes the possibility of the loss of forestland. No impact would occur. This topic will not be further addressed in the EIR.

- 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?**

Less than significant impact. As discussed above, the plan area does not contain, nor is located adjacent to, forested land. Even though the plan area is adjacent to various farmlands, the proposed

plan would not result in conversion of farmland to non-agricultural use or conversion of forestland to non-forest use. Impacts would be less than significant. This topic will not be further addressed in the EIR.

Mitigation Measures

No mitigation measures are required.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. Implementation of the aforementioned cumulative development in combination with the proposed plan would not result in development on “Farmland of Statewide Importance,” “Unique Farmland,” “Unique Farmland,” or within forested areas. Thus, the cumulative agriculture and forestry resources impact would be less than significant. This cumulative topic will not be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
3. Air Quality <i>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.</i> <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Conditions

The plan area is located within the North Coast Air Basin, where air quality is regulated by the North Sonoma County Air Pollution Control District (NSAPCD). Given that the proposed plan area is currently vacant, no stationary air pollutant emission sources exist within the plan area. However, vehicles traveling along Healdsburg Avenue represent mobile air pollutant sources.

Environmental Evaluation

Would the project:

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

No impact. The plan area is located in the North Coast Air Basin, where air quality is regulated by the NSAPCD. The Air Basin is in attainment for all federal and State ambient air quality standards, except for the State 24-hour particulate (PM₁₀) standard, which is only in violation within Humboldt County and regulated by the North Coast Unified Air Quality Management District. Therefore, the NSAPCD is not required to prepare or implement an air quality plan. No impact would occur. This topic will not be further evaluated in the EIR.

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

Potentially significant impact. This impact relates to localized criteria pollutant impacts. Potential localized impacts would be exceedances of State and federal ambient air quality standards. The plan area consists of vacant land, and the proposed plan would redevelop the plan area with a mix of residential and commercial uses. Based on the proposed plan components and related traffic generation, the proposed plan would generate air pollutants that could exceed air quality standards for short-term construction and long-term operational activities. Guidance provided by NSAPCD suggests that lead agencies use thresholds prepared by the Bay Area Air Quality Management District (BAAQMD). Buildout associated with implementation of the proposed plan could generate criteria pollutant emissions that exceed BAAQMD significance thresholds. This is a potentially significant impact and thus will be further evaluated in the EIR.

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)?

Potentially significant impact. For the reasons noted above in impact 3b), implementation of the proposed plan would generate criteria pollutant emissions that could exceed BAAQMD significance thresholds. This is a potentially significant impact and thus will be further evaluated in the EIR.

d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially significant impact. The proposed plan would redevelop a vacant site with residential and commercial uses. Development of the plan area with urban uses could create toxic air contaminant (TAC) emissions from a variety of stationary (non-vehicular) sources such as evaporative emissions from paints, cleaning products, emergency back-up generators, etc. In addition, proposed land uses could create new TAC emissions from construction activities and construction- and operational-related vehicular trips. This is a potentially significant impact and thus will be further evaluated in the EIR.

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

Less than significant impact. Odors can cause a variety of responses. The impact of an odor often results from interacting factors such as frequency (how often), intensity (strength), duration (time), offensiveness (unpleasantness), location, and sensory perception.

The proposed plan would redevelop a vacant site with residential and commercial uses. Diesel exhaust and volatile organic compounds (VOCs) would be emitted during construction of the proposed plan resulting from heavy-duty construction equipment and asphalt paving activities, both of which could be objectionable odors to some populations. However, emissions would disperse rapidly from the site and construction activities would be relatively low in intensity as well as short-term in nature. Therefore, it is not anticipated that construction-related activities would create objectionable odors affecting a substantial number of people. As such, construction odor impacts would be less than significant.

Land uses typically associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The proposed plan's residential and commercial uses are not land uses typically associated with the emission of objectionable odors. During operation of proposed plan land uses, odors could be emitted from vehicles traveling to and from the site; however, these occurrences would not produce a substantial amount of odors and related emissions would be dispersed among the local roadway network. The two potential odor sources known to exist within the City, the Healdsburg Landfill and the Healdsburg Transfer Station, are both located well beyond the one-mile screening distance for potential odor impacts. Therefore, the proposed plan would not place sensitive receptors near a location of substantial objectionable odor, and operational odor impacts would be less than significant. This topic will not be further evaluated in the EIR.

Mitigation Measures

No mitigation measures have been identified at this time. Impacts associated with this topic will be further evaluated and, if necessary, mitigated in the EIR.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. As such, implementation of identified cumulative projects in combination with buildout under the proposed plan would result in cumulative emissions of criteria pollutants and toxic air contaminants, which could in turn result in significant cumulative air pollution and exposure of persons to such pollution and emissions. This is a potentially significant cumulative air quality impact and, thus, will be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
4. Biological Resources <i>Would the project:</i>				
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Conditions

The proposed plan area contains native annual grassland, typical of roadside areas in Sonoma County. The majority of the plan area currently consists of engineered fill and is devoid of significant vegetation; however, the plan area does contain trees. The plan area does not include any heritage trees with a diameter of 30 inches or more measured 2 feet above ground level or any types of habitat identified as biologically unique and of limited distribution, such as serpentine chaparral, serpentine grassland or native grassland. In addition, the plan area does not include native resident or migratory wildlife corridors or native wildlife nursery sites.

The proposed plan area contains limited riparian habitat. Seasonal drainage ditches extend across the western portion of the plan area as well as between the railroad tracks and Healdsburg Avenue. Drainage ditches and marginal areas provide some habitat for native and non-native plants. Some reaches of the main drainage ditch along the western side of the area have emergent vegetation dominated by cattails and other areas have woody vegetation dominated by willows, cottonwood, and coast live oak. Annual grassland habitat is present along the smaller ditches, dominated by ryegrass and tall flat sedge. Much of the seasonal wetland habitat occurs along the lower banks of the ditches. The plan area includes two existing 48-inch- and 36-inch-diameter culverts that convey stormwater in drainage ditches along each side of the railroad tracks. Other areas with seasonal wetland habitat include the southwest corner of the site and a sliver of land between the railroad tracks and Healdsburg Avenue.

The General Plan EIR identified four special-status fish species that are known to occur within the Healdsburg area within the Russian River. This includes: Coho salmon—Central California Coast ESU (*Oncorhynchus kisutch*), Navarro roach (*Lavinia symmetricus navarroensis*), and Russian River tule perch (*Hysteroecarpus traski pomu*). The General Plan EIR notes that Foss Creek may also support California freshwater shrimp (*Syncares pacifica*), a federal- and State-listed endangered species.

Information in this section is based upon results of CDFW's California Natural Diversity Database (CNDDDB), California Native Plant Society (CNPS) inventory of rare and endangered plants, and the United States Fish and Wildlife Service (USFWS) database searches (included in Appendix A).

FirstCarbon Solutions (FCS) completed a review of the original environmental documentation from 2004 and prior, focusing on potential onsite biological resources that were identified and if proposed mitigation measures appropriately reduce potential impacts pursuant to CEQA (see Appendix A5). Prior to conducting a field survey for the purpose of the review, FCS biologists reviewed aerial photos, topographic maps, and previous documentation. A literature and database review was conducted which included the California Department of Fish and Wildlife's (CDFW's) California Natural Diversity Database (CNDDDB) (CDFW 2018; the California Native Plant Society's (CNPS's) Inventory of Rare and Endangered Plants (CNPS 2018); the Healdsburg USGS 7.5-minute quadrangle map (1980); and other technical databases and resource agency reports, in order to assess the current distribution of special-status species and habitats in the vicinity of the plan area.

An FCS biologist visited the site in late spring 2018 to verify the validity of the existing documentation and identify any potentially occurring species or habitats. Specifically, the purpose of this reconnaissance-level field survey was to obtain an overview of the existing habitat conditions within the plan area and the potential of supporting special-status wildlife and plant species, wetlands, critical habitat, wildlife movement, and other potentially jurisdictional features to provide a basis for the CEQA analysis.

Environmental Evaluation

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 developable land in the plan area underwent mass grading in preparation for redevelopment in 2004. This area currently consists of engineered fill. The area does contain non-native annual grassland, typical of roadside areas in Sonoma County.

Special-species plant and wildlife species typically occur in undeveloped areas. Although less likely, it is also possible for them to occur within developed areas. The plan area, in part, has characteristics of land that has been developed or disturbed, including disturbed soils and the presence of invasive and non-native plant species on-site.

Implementation of federal, State, and local regulations and the proposed General Plan policies and implementation measures designed to protect plants and animals and their habitats would reduce impacts related to candidate, sensitive, or special-status species. General Plan policies LU-C-1, LUC-2, and NR-B-3 encourage the clustering of development in more urban areas to avoid impacts to habitat, Policy NR-B-5 (PS-H-7) seeks to protect and preserve areas of habitat by designating those areas as permanent open space. Chapter 20.24, Article III, Section 20.24.085 et. seq., of the City's Zoning Ordinance includes riparian setback requirements for new development. Policy NR-B-1 requires that "Channel improvements to, and tree and brush clearance activities along Foss Creek shall not unnecessarily disturb riparian vegetation." Policy NR-2 requires the proposed plan continue to enforce the riparian setback requirements of the Zoning Ordinance. In addition, Policy NR-B-2 requires the protection of large, mature trees that contribute to the visual quality of the environment or provide important wildlife habitat.

A special-status wildlife habitat assessment report was prepared for the plan area in support of the 2004 regrading Initial Study. The report confirmed that several special-status vertebrate species inhabit the region or historically occurred in the area. The report determined that most of these species are not expected in the plan area because of extensive habitat modification and fragmentation in the area, high levels of human activity, and a lack of recent local recorded sightings.

However, intact wildlife habitats exist to the north and south of the site. The habitats may support special-status species and may occur on-site on an infrequent basis (migration or dispersal). In order to ensure potential impacts will be reduced to less than significant levels, and as recommended in the assessment, Mitigation Measure (MM) BIO-1 shall be incorporated in the plan to reduce impacts to less than significant. This topic will not be further addressed in the EIR.

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. The Comstock property was cleared of all structures and regraded to provide a level area for development, with sloped hillsides remaining along the western and northern boundaries. The City prepared an Initial Study for the plan area regrading and demolition plan which is dated January 6, 2004.⁷ The Initial Study included an arborist report, streambed alteration agreement, wetland mitigation plan, and cultural resources survey. Site regrading resulted in loss of 0.17 acre of waters of the United States and 0.19 acre of seasonal wetland. A revegetation program for wetland mitigation was completed in 2009.⁸ The program included creation of 0.43 acre of waters of the United States excavated on upland property and establishment of 0.20 acre of seasonal wetland within a constructed drainage channel.

The plans for regrading included drainage designed to sheet flow in a southeasterly direction towards a drainage ditch along the eastern side of the plan area parallel to the NCRA train track. The wetland mitigation plan also included details for planting and grading to reduce bank erosion. Currently, drainage flows into a 0.7-acre stormwater detention basin at the southern end of the plan area, which filters out sediments and contaminants to improve water quality runoff into Foss Creek. All work was completed in compliance with local and state permitting requirements.

As discussed above, the plan area contains seasonal drainage ditches across the western portion of the site as well as between the railroad tracks and Healdsburg Avenue. According to an Initial Study/Mitigated Negative Declaration (IS/MND) prepared in 2004 for the regrading of the site and reconstruction of on-site drainage, the areas are federally regulated under Section 404 of the Clean Water Act. As required by the 2004 IS/MND, and a permit issued by the United States Army Corps of Engineers (USACE), mitigation planting for the plan area regrading impacts to wetland and riparian habitat was implemented in four drainage areas. The wetland and riparian habitat mitigation within areas of the proposed plan included annual and on-going monitoring to ensure success. The proposed area plan would ensure that development activities within the plan area would be located in the developable portions for the site only, avoid impacts on these mitigation plantings, and ensure their on-going functions and values.

Implementation of federal, State, and local regulations and General Plan policies that are designed to protect riparian (Policy PS-D-2; Policy NR-B-1; Policy NR-B-3; and Policy NR-C-6), oak woodland (Policy LU-C-2; Policy NR-B-2; Policy NR-B-3; Policy NR-C-6; and Policy CD-A-7), wetlands (Policy NR-C-6), and other sensitive habitats (Policy LU-C-2; Policy NR-B-1; Policy NR-B-3; Policy NR-B-5; Policy NR-C-4; and Policy NR-C-6) would ensure that impacts related to these habitats or other sensitive communities are less than significant. Future development would be subject to Design Review, which includes a review for compliance with the area plan and the General Plan policies referenced above. The area plan would include an implementation section discussing compliance with the applicable policies and required entitlements. This topic will not be further addressed in the EIR.

⁷ Initial Study Regrading and Demolition Plan for 32-Acre Site Located at 16977 Healdsburg Avenue, January 6, 2004.

⁸ Quaker Hill-32 Revegetation Program for Final Wetland Mitigation Plan 2009 Final Monitoring Report.

- 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 plan area contains drainage ditches and areas of seasonal wetlands. As identified in the Initial Study/Mitigated Negative Declaration (IS/MND) prepared in 2004 for the regrading of the plan area and reconstruction of on-site drainage, the on-site drainage ditch areas that may contain seasonal wetlands areas are federally regulated under Section 404 of the Clean Water Act. As required by the 2004 IS/MND, and a permit issued by the USACE, mitigation planting for the plan area regrading impacts to wetland and riparian habitat was implemented in four drainage areas. The wetland and riparian habitat mitigation for the plan area grading project included annual and ongoing monitoring to ensure success. Consistent with the proposed plan, the City would conduct design review to ensure that future development is not sited in sensitive areas and construction activities would avoid impacting protected wetlands.

Construction activities have the potential to degrade water quality through the exposure of surface runoff as well as runoff from construction equipment. Construction activities typically include the refueling of construction equipment on location. As a result, minor fuel and oil spills may occur with a risk of larger releases. Without rapid containment and cleanup, these materials could be potentially toxic, depending on the location of the spill in proximity to water features. Accidental spills within the plan area work sites and into the on-site drainage ditches could result in adverse impacts to aquatic environments. Applicants for land use entitlements within a wetland area shall be required to submit a formal wetland jurisdictional delineation conducted by a qualified wetlands expert familiar with the requirements of the USACE. Development within this proposed plan shall comply with USACE requirements pursuant to Section 404 of the Clean Water Act and would potentially result in a substantial adverse effect on federal- and State-protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means. This is a potentially significant impact. However, implementation of MM BIO-2 would reduce impacts to Section 404-protected wetlands to less than significant. This topic will not be further addressed in the EIR.

- 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. The plan area previously supported a lumberyard and mill operations on the Comstock property. In 2004, the plan area underwent mass grading in preparation for redevelopment. The plan area does not include native resident or migratory wildlife corridors or native wildlife nursery sites. The plan area does not contain spawning habitat and unlikely to support a juvenile fish population. The plan area contains poor and seasonal rearing habitat, and access to the site for juvenile fish precluded by a 4-foot drop from the culvert under the railroad tracks.

The regrading and drainage improvements conducted in 2004 were anticipated to improve habitat quality in downstream anadromous salmonid habitat. Given the plan area's proximity to Foss Creek, a tributary of the Russian River, a salmonid habitat suitability assessment was conducted in 2003

and incorporated into the IS/MND for the proposed regrading project. Based on that assessment, the 2004 IS/MND concluded that Foss Creek has very limited steelhead resources and that the plan area does not support salmonids. Aquatic habitat within the slough are similarly unsuitable for salmonid rearing habitat even if access was possible. Furthermore, seasonal surface flow and aquatic habitat is characterized as marsh with standing water and emergent vegetation.

Changes in water quality relative to downstream habitat from the plan area are anticipated to be beneficial to steelhead habitat. Construction would relocate and improve site drainage and capture runoff to avoid water quality impacts. In addition, the proposed plan would improve sloping and anticipated to improve water quality of runoff from the plan area. Therefore, the previous site-regrading and drainage improvements are anticipated to improve stormwater quality runoff and habitat quality in downstream anadromous salmonid habitat.

Suitable freshwater habitat is identified in areas downstream of sub-area A. However, the plan area is located in the northern section of the City, in sub-area D, and thus is not likely to impact habitat. In addition, the City would ensure compliance with the federal and State regulations related to the protection of migratory fish and wildlife species along with confirmation of compliance with the General Plan policies that protect biological resources (Policy PS-D-2; Policy NR-2; Policy S-C-3) at the time of formal entitlement review. This would reduce impacts to less than significant. This topic will not be further addressed in the EIR.

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

No impact. The City protects “heritage trees,” defined in Article 18, Section 18105 of the City’s Zoning Ordinance, as any tree with a diameter of 30 inches measured 2 feet above ground level. The plan area consists of flat ground and is largely devoid of vegetation. Mass grading activities occurred to prepare the area for redevelopment in 2003. The plan area does not include any heritage trees or any types of habitat identified as biologically unique and of limited distribution, such as serpentine chaparral, serpentine grassland, or native grassland.

Pursuant to Title 20 of the Healdsburg Land Use Code, Chapter 20.24 (“Environmental and Historic Resources Protection”), future land use development contemplated by the proposed plan would be required to comply with various regulations and policies aimed at protecting and preserving biological resources. The City would ensure compliance with General Plan policies and Land Use Code requirements for environmental resource protections during the entitlement phase of future development projects. While the proposed plan does not propose to remove trees, all tree removal would be required to comply with the applicable provisions of the Municipal Code. Title 20, Chapter 20.24.085, et. seq., of the City’s Zoning Ordinance includes riparian setback requirements for new development. Setbacks apply to any structure or other form of development located on property adjacent to or near Foss Creek, or other stream or creek, except as provided in the zoning ordinance. The requirements of this ordinance do not apply to public streets or utilities, flood control facilities, erosion control structures or creek bank stabilization improvements that have been approved as required by governmental agencies having jurisdiction over them. General Plan Policy NR-2 also requires that the City “Continue to enforce the riparian setback requirements of the Zoning

Ordinance.” As discussed above, future development pursuant to the proposed plan would be required to comply with General Plan policies and Land use Code requirements aimed at protecting and preserving biological resources. Therefore, associated impacts are less than significant. This topic will not be further addressed in the EIR.

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?

No impact. The plan area is not located in an area covered by an adopted habitat conservation plan. As discussed above, future development pursuant to the proposed plan would be required to comply with General Plan policies aimed at protecting and preserving biological resources. Therefore, no impact would occur. This topic will not be further addressed in the EIR.

Mitigation Measures

MM BIO-1 Migratory Birds and Nesting Raptors

The following requirement shall be imposed as a condition of approval on all development within the proposed plan area: A pre-construction survey of the site shall be required in order to ensure that nesting raptors, loggerhead shrikes, and other nesting special-status birds are not nesting during project construction. Specifically, these measures shall include:

- If construction is proposed during the breeding/nesting season for local avian species (typically February 15 through August 31), a focused survey for active nests of migratory birds within and in the vicinity of the project plan shall be conducted by a qualified biologist. Two surveys will be conducted, at least one (1) week apart, with the second survey occurring no more than two (2) days prior to tree removal. If no active nests are found, tree removal or construction activities may proceed.
- If an active nest is located during pre-construction surveys, the United States Fish and Wildlife Service (USFWS) and/or the California Department of Fish and Wildlife (CDFW), 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-2 Federally Protected Wetlands

Prior to any specific project development approval or grading that may fill or otherwise encroach into potentially jurisdictional waters of the U.S., the project proponent shall conduct a delineation of waters of the U.S. to determine the extent of USACE, RWQCB, and CDFW potentially jurisdictional features that would be potentially impacted on-site. Any encroachment or fill in these USACE, RWQCB

and/or CDFW jurisdictional areas shall not occur unless a Section 404/Section 401 permit or Waste Discharge Requirement and/or Streambed Alteration Agreement, respectively, are acquired and the project proponent replaces the lost value of the jurisdictional area to the satisfaction of the resources agencies issuing the permits to ensure a no-net loss. If proposed development will encroach upon or fill any jurisdictional wetland areas, the applicant shall do the following:

- Apply for a Section 404 permit from the USACE concurrently or after verification of the wetland delineation by the USACE. Any wetlands that would be lost or disturbed shall be replaced or rehabilitated on a “no net loss” basis in accordance with the USACE mitigation guidelines. On-site creation of wetland habitat may be preferred to off-site mitigation. Habitat restoration, rehabilitation, and/or replacement shall be at a location and by methods agreeable to the USACE;
- Obtain a Section 401 water quality waiver of certification from the Regional Water Quality Control Board (RWQCB); and
- Obtain a Streambed Alteration Agreement with the CDFW.

If encroachment upon or fill of wetlands is proposed, as a condition of approval for all future development within the plan area, a mitigation plan shall be implemented that includes at least one of the following:

- Completion of an on-site Mitigation and Monitoring Plan that includes on-site creation/preservation of the wetlands and/or;
- Credits may be obtained at an approved mitigation bank.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. As such, implementation of the aforementioned identified cumulative projects in combination with buildout pursuant to the proposed plan could result in cumulative adverse effects, either directly or through habitat modifications, to species identified as a candidate, sensitive, or special-status species or habitats identified as communities of special concern. However, with adherence to California Department of Fish and Game, U.S. Fish and Wildlife Service, and USACE regulations as well as project-specific biological study recommendations (i.e., mitigation measures) identified as cumulative projects and the proposed plan, the cumulative biological resources impact would be less than significant. This cumulative topic will not be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
5. Cultural Resources				
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>				
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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Conditions

A lumberyard and mill operated within the proposed plan area at least as far back as the 1950s until 2000. The 2004 IS/MND considered the demolition and removal of all structures, foundations, and concrete surface areas within the plan area. The mill equipment and previous developments were removed in 2004, and improvements have since been completed within the plan area. Improvements included activities to remediate contaminated soils as well as to modify and improve existing site drainage features. No known historical, archeological, paleontological, or tribal resources exist within the plan area. In addition, no known burial sites exist within the plan area.

Information in this section is based upon results of the NWIC historical, archeological, and tribal resources database search and the UCMP paleontological resources database search (included in Appendix B).

Environmental Evaluation

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 with mitigation incorporated. A cultural resources survey was conducted for the plan area in 2002. The survey consisted of archival research and a pedestrian survey of the site, neither of which identified any cultural resources within the plan area. An updated records search was requested from NWIC on April 4, 2018. The records search identified eight recorded cultural resources within 0.5 mile of the plan area, all of which are historic in nature, and all of which are located outside the plan area. The plan area is currently a vacant undeveloped lot and has been previously graded in preparation for redevelopment. As such, the likelihood of encountering undiscovered historic resources is considered low.

While unlikely, subsurface construction activities always have the potential to damage or destroy previously undiscovered cultural resources. Historic resources can include wood, stone, foundations, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, and other refuse. Accordingly, this would be a potentially significant impact. However, implementation of MM CUL-1 would reduce potential impacts to historic resources to a less than significant level. This topic will not be further addressed in the EIR.

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

Less than significant impact with mitigation incorporated. Mass earthwork grading is not anticipated given the plan area previously underwent site grading and drainage improvements. The majority of the plan area is covered with engineered fill that was placed during remedial grading operations in 2004. As discussed above, a cultural resources survey was conducted for the plan area in 2002. The survey consisted of archival research and a pedestrian survey of the plan area, both of which failed to identify any cultural resources within the plan area. An updated records search was requested from NWIC on April 4, 2018. The records search identified eight recorded cultural resources within 0.5 mile of the plan area boundaries, none of which are prehistoric in nature, and all of which are located outside the plan area. As such, the likelihood of encountering undiscovered prehistoric archaeological resources is considered low.

Development activities always have the potential to encounter undiscovered archaeological resources, however. Such resources could consist of but are not limited to stone, bone, wood, or shell artifacts or features, including hearths and structural elements. Accordingly, this would be a potentially significant impact. However, implementation of MM CUL-1 would reduce this potential impact to a less than significant. This topic will not be further evaluated in the EIR.

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

Less than significant impact with mitigation incorporated. On April 2, 2018, FCS consulting Paleontologist Kenneth Finger conducted a UCMP database search for potential paleontological resources within the plan area. The plan area, located on the geological map of Blake et al. (2002),⁹ consists of Quaternary alluvium (Qal) and sedimentary rock of the Great Valley Complex (KJgvs), both of which are potentially fossiliferous. The UCMP database lists 27 vertebrate fossil localities in Sonoma County. Of these, ten are late Pleistocene, five are Pliocene, 10 are Miocene, one is Holocene, and one is not assigned an age. No vertebrate fossils have been found within 10 miles of the plan area.

Mass earthwork grading is not anticipated given the plan area previously underwent site grading and drainage improvements. The majority of the plan area is covered with engineered fill that was placed during remedial grading operations in 2004 on the site. As such, the likelihood of encountering undiscovered paleontological resources during plan implementation is considered low.

While unlikely, there is always the possibility that ground-disturbing activities during construction may uncover previously unknown paleontological resources. Accordingly, this would be a potentially significant impact. However, implementation of MM CUL-2 would reduce this potential impact to a less than significant. This topic will not be further evaluated in the EIR.

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 plan area. However, there is always the possibility that subsurface construction activities associated with the proposed plan, such as trenching and grading, could potentially damage or destroy previously undiscovered human remains. Accordingly, this is 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; Public Resources Code Section 5097.94 and Section 5097.98 must be followed. In the unlikely event human remains are discovered, implementation of MM CUL-3 would reduce this potentially significant impact to less than significant. This topic will not be further evaluated in the EIR.

⁹ Blake, M.C., Graymer, R.W., and Stamski, R.E., 2002, Geologic map and map database of western Sonoma, northernmost Marin, and southernmost Mendocino counties. U.S. Geological Survey, Miscellaneous Field Studies Map MF-2402, scale 1:100,000.

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. A review of the California Register of Historical Resources, local registers of historic resources, and a records search conducted at the NWIC failed to identify any listed Tribal Cultural Resources (TCRs) that may be adversely affected by the proposed plan. On February 12, 2018, representatives from the City of Healdsburg reached out to four tribal representatives identified by the NAHC as having possible interest in consulting on the project pursuant to AB-52. No responses were received within the 30-day consultation period.

On April 10, 2018, a letter was sent to NAHC in an effort to determine whether any sacred sites are listed on its Sacred Lands File within the plan area. A response from the NAHC was received on April 16, 2018 indicating that the Sacred Lands File search indicated the presence of Native American cultural resources in the immediate project area, and that tribal representatives should be contacted for additional information. The NAHC included a list of four local tribal representatives available for consultation. To ensure that all Native American knowledge and potential prehistoric concerns about the project are addressed, a letter containing project information and requesting any additional information was sent to each tribal representative on April 19, 2018. No responses have been received to date, and no TCRs have been identified as having the potential to be adversely affected by the project. However, as a conservative analysis, this would be a potentially significant impact. Should undiscovered TCRs such as Native American artifacts or burials be encountered during project construction, implementation of MM CUL-1 and MM CUL-3 would ensure related impacts are reduced to less than significant. This topic will not be further evaluated in the EIR.

- 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.**

No impact. Tribal consultation efforts conducted by the City of Healdsburg in its capacity as lead agency pursuant to AB-52 failed to identify significant TCRs meeting the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. As such, no significant TCRs would be adversely affected by the proposed plan. This topic will not be further evaluated in the EIR.

Mitigation Measures

- MM CUL-1** The following requirement shall be imposed as a condition of approval on all future development within the plan area: In the event a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid

altering the materials until a qualified archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology has evaluated the situation. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Any previously undiscovered resources found during construction activities shall be recorded on appropriate Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by a qualified archaeologist. Potentially significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. If the resource is determined to be significant under CEQA, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant in accordance with Section 15064.5 of the CEQA Guidelines. The archaeologist shall also perform appropriate technical analyses, prepare a comprehensive report complete with methods, results, and recommendations, and provide for the permanent curation or repatriation of the recovered resources in cooperation with the designated Most Likely Descendant (MLD) as needed. The report shall be submitted to the City of Healdsburg, the Northwest Information Center, and the State Historic Preservation Office (SHPO), if required. The plan shall be approved by the City of Healdsburg for review and approval prior to implementation, and the applicant shall adhere to the recommendations in the plan.

MM CUL-2

The following requirement shall be imposed as a condition of approval on all future development within the plan area: In the event that fossils or fossil-bearing deposits are discovered during construction activities, excavations within a 100-foot radius of the find shall be temporarily halted or diverted. The construction contractor shall notify a qualified paleontologist to examine the discovery. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find. If the applicant determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The plan shall be submitted to the City of Healdsburg for review and approval prior to implementation, and the applicant shall adhere to the recommendations in the plan.

MM CUL-3

The following requirement shall be imposed as a condition of approval on all future development within the plan area: 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; Public Resources Code Section 5097.94 and Section

5097.98 must 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 within 100 feet of the 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 Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the most likely descendant (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work within 48 hours, 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.
2. Where the following conditions occur, the landowner or his or 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 most likely descendant or within the plan area in a location not subject to further subsurface disturbance:
 - 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.
 - 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.

Additionally, California Public Resources Code Section 15064.5 requires the following relative to Native American Remains:

- When an initial study identifies the existence of, or the probable likelihood of, Native American remains within a project, a lead agency shall work with the appropriate Native Americans as identified by the Native American Heritage Commission as provided in Public Resources Code Section 5097.98. The applicant may develop a plan for treating or disposing of, with appropriate dignity, the human remains and any items associated with Native American Burials with the appropriate Native Americans as identified by the Native American Heritage Commission.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of

commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. As such, implementation of the aforementioned identified cumulative projects in combination with the proposed plan could result in adverse impacts to historic, prehistoric, paleontological, or tribal cultural resources. These projects, however, would be required to mitigate for impacts through compliance with applicable federal and state laws governing cultural resources. Given the low probability of significant cultural resources within the plan area and the comprehensiveness of mitigation measures that would apply to the proposed plan and identified cumulative projects in the vicinity, the cumulative cultural resources impact would be less than significant. This cumulative topic will not be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
6. Geology and Soils				
<i>Would the project:</i>				
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Conditions

The plan area lies within a seismically active region that includes major active fault systems. A geotechnical report prepared for the plan area identified two previously unidentified strike-slip faults (predominant movement side-to-side with minor vertical displacement).¹⁰ The two faults are associated with the Healdsburg fault, which cross the northern and southern portions of the plan

¹⁰ Kleinfelder 2017. Geotechnical Investigation, Quaker Hills Property, Healdsburg, CA, September.

area. The major fault systems are capable of producing a maximum earthquake event of 6.9 (Richter Magnitude).

Soil liquefaction is a condition where saturated, granular soils undergo a substantial loss of strength and deformation due to pore pressure increase resulting from cyclic stress application induced by an earthquake. According to the General Plan EIR Liquefaction Hazard Locations Map, Figure IV.G-3, the central portion of the plan area may contain susceptible soils prone to liquefaction during or immediately following a seismic event. In addition, the plan area consists of flat ground with relatively gentle topography.

Information in this section is based upon results of the geotechnical report prepared specifically for the plan area (included in Appendix C).

Environmental Evaluation

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. Based on the plan area geotechnical report findings, the potential for ground surface rupture within the plan area is high along the two identified Healdsburg fault traces and moderate within a 50-foot zone on either side of the fault traces. The potential for ground rupture elsewhere on in the plan area is considered low. Future horizontal displacements in these areas could range from a few inches to possibly two feet during a moderate to major event centered in the area. However, since the proposed plan would not construct habitable structures within 200 feet of the faults, in compliance with the Alquist-Priolo Act, and would not expose people or structures to substantial adverse effects associated with fault rupture, this impact would be less than significant. This topic will not be further evaluated in the EIR.

- ii) **Strong seismic ground shaking?**

Less than significant impact. According to the plan area geotechnical report, major earthquakes generated by active faults can be expected to cause strong ground shaking. Strong ground shaking can also be expected from moderate to major earthquakes generated on other faults in the region, such as the Healdsburg/Rodgers Creek fault, (located 5.5 miles northeast of the site) and the San Andreas fault (located 20 miles southwest of the site). The intensity of future shaking will depend on the distance from the plan area to the earthquake focus, magnitude of the earthquake and the response of the underlying soil and bedrock. The proposed plan includes residential and nonresidential components that would be constructed to the most recent California Building Code standards. As such, buildout under the proposed plan would not expose people or structures to

substantial adverse effects associated with seismic ground shaking, and this impact would be less than significant. This topic will not be further evaluated in the EIR.

iii) Seismic-related ground failure, including liquefaction?

Less than significant impact. The plan area geotechnical report identified relatively shallow bedrock underlain with cohesive soils near the surface. The susceptibility to liquefaction within the plan area is, thus, considered to be low. The plan area geotechnical report further determined that the potential for other secondary seismic effects related to liquefaction, such as lateral spreading or lurching, is considered low. Therefore, impacts from seismic-related ground failure would be less than significant. This topic will not be further evaluated in the EIR.

iv) Landslides?

Less than significant impact. The plan area previously underwent site grading and drainage improvements, resulting in engineered fill placed during remedial grading operations in 2004 across the plan area. The plan area is bounded on three sides by a steep grassland/woodland hillside to the north, an approximate 45-foot-high embankment to the west, and moderately sloped hillsides to the south.

The General Plan identified sub-areas to accommodate potential new development throughout the City. The General Plan EIR examined those areas that coincide with the possible risk of landslides. The General Plan EIR those identified sub-areas, Figure IV.G-5, that experienced or prone to landslides. The plan area is located within sub-area D. The plan area has not experienced a landslide, and sub-area D is not located within an area highly prone to landslides.

The plan area geotechnical report evaluated the potential for landslides. As discussed above, the plan area largely consists of flat ground. The report determined that the potential for seismically induced slope failures is considered low within or immediately adjacent to the plan area. However, the report did identify a moderate potential for seismically induced slope failure in the southwest corner of the plan area. The report identified three relatively small landslides exist near that area of the plan areas. The slides area shallow (less than 10 feet thick) and limited in extent, the report notes that the slides do not pose a significant hazard to development. The landslides can be removed, if construction is proposed within 30 feet of the area, during future grading and/or reconstruction.

Consistent with General Plan policies LU-A-6, LU-C-1, LU-C-2, T-A-8, T-A-12, S-A-1, S-A-2, SA-3, S-B-1, and S-B-2 and local building code requirements, the City would ensure that future development projects would be constructed in accordance with geological limitations (Appendix C) and will be required to employ structurally sound building practices. Therefore, this is considered a less than significant impact. This topic will not be further evaluated in the EIR.

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

Less than significant impact. In 2003, a portion of the plan area was improved for redevelopment. Improvements consisted of cleanup of contaminated soil, grading, drainage, and wetland mitigation. The plan area was mass graded to establish positive sheet flow drainage toward Healdsburg Avenue,

and an on-site collection, retention, and a discharge drainage system was constructed to minimize soil erosion and improve water quality. The plan area geotechnical report identified the plan area as containing relatively shallow bedrock underlain and cohesive soils near the surface.

To minimize the potential risk of soil erosion during construction, the plan area would be subject to mandatory compliance with all California Building Code requirements. The plan area is relatively flat and prior grading activities would help to ensure no portions of the plan area would experience significant erosion or sediment transport through standard control practices. Therefore, less than significant impacts from erosion would result from buildout under the proposed plan. This topic will not be further evaluated in the EIR.

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. Mass grading was previously completed in 2004 and grading associated with the proposed plan would be minimal, consisting of mainly minor cuts and fills necessary for road improvements, parking areas, and building pads as well as site drainage.

The plan area's geotechnical report determined that the plan area is located on a relatively stable geologic unit. The plan area is covered by cohesive soils and underlain by relatively shallow bedrock. Construction activities associated with the proposed plan would include removal of vegetation, excavation, and grading. To minimize the potential risk of soil erosion during construction, construction activities would be subject to mandatory compliance with all California Building Code requirements. Given the plan area is relatively level, the geotechnical report did not identify areas experiencing significant erosion or sediment transports. In addition, any future development would be required to apply for a grading permit with the City as well as submit a Stormwater Pollution Prevention Plan (SWPPP) that would further address potential erosion risk. Therefore, impacts would be considered less than significant. This topic will not be further evaluated in the EIR.

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. According to the plan area geotechnical report, the principal geotechnical factors that may affect future development in the plan area are the presence of non-engineered fill, expansive soils, and bedrock, and local shallow (perched) groundwater. Based on the geotechnical report, the plan area contains upper native in-place alluvial soils, colluvial soils, and engineered fill soils. In general, these soil types are considered to have a moderately to high expansive potential. In addition, the report identified highly weathered serpentinite and areas of severely weathered shale, also considered to have a highly expansive potential.

In 2017, intermittent soil and rock samples were collected from the plan area and tested. The results indicate plasticity indices ranging from 20 to 33, and liquid limits ranging from 37 to 65. Based on the plasticity index results, the plan area has a medium to high expansion potential. The liquid limit results indicate that the plan area has a medium to very high expansion potential.

However, the findings of the geotechnical report included recommendations for proposed development within the plan area, which will be implemented by the applicant prior to constructing building foundations and undertaking earthwork. The City would review future development applications for consistency prior to issuance of building permits. This includes structural designs and other techniques to overcome shrink-swell effects. As such, the proposed plan would not expose people or structures to substantial adverse effects associated with expansive soils, and this impact would be less than significant. This topic will not be further evaluated in the EIR.

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. Proposed development within the plan area would be connected to a public sanitary sewer system and maintained by the Municipal Utility Department, which services all of the City of Healdsburg. An existing 10-inch public sewer would be extended to the plan area from Healdsburg Avenue; no septic systems are proposed within the plan area. No impact would occur. This topic will not be further evaluated in the EIR.

Mitigation Measures

No mitigation measures are required.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. As such, implementation of the aforementioned identified cumulative projects in combination with the proposed plan could result in cumulative placement of persons and structures on or proximate to earthquake faults and unstable soils, which could in turn result in cumulative exposure of persons or structures to seismic-related geotechnical hazards and soil erosion/failure. However, with adherence to California Building Code requirements and the Alquist-Priolo Act (preventing placement of habitable structures within 200 feet of an earthquake fault) as well as project-specific geotechnical study recommendations (i.e., mitigation measures) by project proponents for the identified cumulative projects and the proposed plan, the cumulative geology/soils impact would be less than significant. This cumulative topic will not be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
7. Greenhouse Gas Emissions <i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Encourage activities that result in the use of large amounts of energy, or use of energy in a wasteful manner? ¹¹	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Existing Conditions

The plan area is located within the NSAPCD. Given that the plan area is currently vacant, no greenhouse gas (GHG) emissions are currently generated and no energy (renewable or non-renewable) is currently consumed within the plan area.

Environmental Evaluation

Would the project:

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

Potentially significant impact. The NSAPCD has not adopted standards of significance for construction and operational activities and instead recommends the use of the BAAQMD’s thresholds and mitigation measures. The thresholds established by BAAQMD for project-level operational greenhouse gas generation are as follows:

- Compliance with a qualified Greenhouse Gas Reduction Strategy, or
- 1,100 MT CO₂e/year, or
- 4.6 metric tons of CO₂ equivalent per service population (employees plus residents).

The estimated annual emissions for the project will be compared with the 1,100 MT CO₂e/year bright line threshold to determine significance for this criterion. Buildout under the proposed plan would create new GHG emissions from construction and operational activities. This is a potentially significant impact and thus will be further evaluated in the EIR.

¹¹ This environmental issue question is included for purposes of addressing CEQA Guidelines Appendix F.

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

Potentially significant impact. For the reasons noted in impact 7a), above, buildout under the proposed plan would contribute to GHG emissions that could exceed BAAQMD significance thresholds. In addition, implementation of the project must be analyzed to ensure that the project would comply with all mandatory GHG emission reduction measures that apply to the project. This is a potentially significant impact and thus will be further evaluated in the EIR.

c) Encourage activities that result in the use of large amounts of energy, or use of energy in a wasteful manner?

Potentially significant impact. Buildout under the proposed plan would result in an irreversible and irretrievable commitment of resources and energy during construction and operation, as described below. Development under the proposed plan would require the use of nonrenewable construction materials, such as concrete, metals, and plastics, construction equipment fuel, and electricity for construction staging lighting. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation, and construction of the signs. Operation of the land uses within the plan area would consume energy for lighting and other electronics and natural gas for heating. Energy, in the form of fossil fuels, would also be used to fuel vehicles travelling to and from the residential and nonresidential land uses on the project plan during plan operation. Development under the proposed plan would consume non-renewable energy during both construction and operational activities and, thus, would not only use energy but could also result in the use of energy in a wasteful manner. This is a potentially significant impact and thus will be further evaluated in the EIR.

Mitigation Measures

No mitigation measures have been identified at this time. Impacts associated with this topic will be further evaluated and, if necessary, mitigated in the EIR.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. As such, implementation of identified cumulative projects in combination with the proposed plan would result in cumulative emissions of greenhouse gases and cumulative consumption of energy. This is a potentially significant cumulative greenhouse gas emissions impact and, thus, will be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
8. Hazards and Hazardous Materials				
<i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Existing Conditions

RJW Lumber Company previously operated a lumber in the plan area. The plan area has since been graded and it is now a vacant, undeveloped lot covered in vegetation. The plan area contains a LUST

Cleanup Site that was completed on April 8, 1996 according to the California State website GeoTracker¹². The Regional Water Board confirmed that no further action was needed related to petroleum releases at the LUST Cleanup site.¹³ No other existing hazardous materials are associated with the plan area.

The plan area is considered at moderate risk of wildland fire hazards. High fire zones are located approximately 0.25 mile to the south/southeast of the plan area. The plan area is undeveloped and contains mostly grassland with sloping hillsides and woodland vegetation to the north and southwest.

Environmental Evaluation

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. The residential and commercial land uses contemplated by the proposed plan do not typically involve the regular use, storage, transport, or disposal of significant amounts of hazardous materials. Construction and operation of development under the proposed plan would involve the minor routine transport and handling 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 to hazardous materials.

However, the proposed plan would not create a significant hazard to the public or the environment. Construction and operation would comply with applicable federal, State, and local laws pertaining to the safe handling and transport of hazardous materials. The use of acutely hazardous materials of any quantity that have the potential to result in releases that could potentially expose substantial numbers of people or the environment to harm is not anticipated given the proposed plan components.

Household hazardous materials can be disposed of in two ways. Residents can dispose of hazardous materials at the Household Waste Collection Facility at the Central Landfill and through local collection events held by the Sonoma County Waste Management Agency program. Commercial uses may generate hazardous materials but federal and State laws regulate transport, use, and disposal. At the federal level, CERCLA, SRA, RCRA, FIFRA, and NESHRA acts serve to track materials, apply standards for cleanup and remediation, and require certifications for handlers and adherence to guidelines tailored to specific hazardous materials. The State of California has developed Certified Unified Program Agencies, administered locally by the Healdsburg Fire Department, that ensure registration of hazardous waste generators, permitting of storage tanks, compliance with the Uniform Fire Code, implementation of emergency response procedures, employee training for facilities handling hazardous materials, implementation of hazardous materials release response plan, and mitigation of potential accidental release. The Governor's Office of Emergency Services (Cal OES) also requires that

¹² GeoTracker. Website: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Healdsburg%2C+CA>.

¹³ California Regional Water Quality Control Board, North Coast Region. RJW Lumber Company. April 8, 1996.

specific businesses prepare an inventory of hazardous materials in order to implement proper emergency response plans.

Furthermore, the General Plan addresses the potential for hazardous materials to impact the public or the environment. Policies S-H-1 and S-H-2 regulate the production and use, storage, and transport of hazardous materials within the City by ensuring new developments provide for reasonable controls and protect current and new development from existing hazardous waste. Impacts would be less than significant. This topic will not be further evaluated in the EIR.

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 with mitigation incorporated. The proposed plan contemplates the development of a vacant site with a variety of new land uses. These new uses would involve the routine application of common low-level hazardous materials such as cleaning solvents, diesel, gasoline, grease/degreasers, mechanical fluids, and oil. The proposed plan components do not include industrial or commercial land uses that involve transport of hazardous materials for delivery or disposal purposes, which would not increase the risk of upset and accidents. Given the small quantities involved and the characteristics of the use, the use of hazardous materials would not be considered a potential risk to human health or the environment. The use of acutely hazardous materials of any quantity that have the potential for a reasonably foreseeable upset and accidental release into the environment is unlikely.

The plan area geotechnical report prepared indicates that the majority of the plan area is underlain with siltstone and sandstone. The central portion of the plan area is underlain by alluvial deposits consisting of clay, silt, sand, and gravel. The upper elevations in the northeast corner of the plan area and ridgeline adjacent to the northern plan area boundary are mapped as underlain by serpentinite, an ultramafic rock where naturally occurring asbestos is likely to be encountered. The geotechnical report identified highly weathered serpentinite in an isolated area along the west property line with little to no asbestos form minerals visually noticeable; however, it is likely some asbestos would exist in this type of rock.

Mass earthwork grading is not anticipated given the plan area previously underwent site grading and drainage improvements. The majority of the plan area is covered with engineered fill that was placed during remedial grading operations in 2004 on the site. Future grading in the plan area is expected be minimal, and consist mainly of relatively minor cuts and fills necessary to create road improvements, parking areas, and building pads as well as additional site drainage.

The geotechnical report did not perform a site assessment of Naturally Occurring Asbestos Mineral (NOAM) rocks or deposits. While no NOAM-bearing rocks or deposits were identified within the footprints of proposed development areas, some portions of the plan area may contain serpentinite, which contains naturally occurring asbestos. While such areas are subject to ARB's asbestos airborne toxic control measures for Surfacing Applications and for Construction, Grading, Quarrying, and Surface Mining Operations, construction workers and nearby residents could be exposed to dust from asbestos rock and soils during construction of elements of the proposed plan. Specifically,

exposure may occur in foundation excavations or pipeline trenching, and handling of NOAM materials would likely be needed during construction in the northeast portion of the plan area. This is a potentially significant impact and would be reduced to less than significant with implementation of MM HAZ-1. This topic will not be further evaluated in the EIR.

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. The plan area is located approximately 1.5 miles north of Healdsburg High School, the closest school to the plan area. Buildout under the proposed plan could include a senior living community with medical services, which may emit hazardous emissions or handle quantities of hazardous materials but in limited amounts, and consistent with applicable regulations. The emission or handling of acutely hazardous materials of any quantity at such a distance from a school precludes the possibility of a school becoming exposed to hazardous emissions or hazardous materials. No impact would occur. This topic will not be further evaluated in the EIR.

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. The plan area is currently a vacant undeveloped lot. A lumberyard and mill operated on-site at least as far back as the 1950s until 2000. The mill equipment and previous developments were removed, and the plan area was regraded in 2004. Improvements also included activities to remediate contaminated soils with oversight by the North Coast Regional Water Quality Control Board.

The plan area is included in the State Water Resources Control Board GeoTracker database as a cleanup site. The GeoTracker database indicates cleanup activities were completed and the casefile closed in April 1996. All other sites listed in the database within 1 mile of the plan area indicate cleanup or remedial activities were completed and cases files are closed. The Department of Toxic Substance Control (DTSC) EnviroStor maintains a second database that lists hazardous sites through California. The plan area is not listed in the database, and no listed site is located within one mile of the plan area. Therefore, impacts from a known hazard on-site would be less than significant. This topic will not be further evaluated in the EIR.

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?

Less than significant impact. The plan area is located approximately 1.2 miles southwest of the Healdsburg Municipal Airport. The Comprehensive Airport Land Use Plan for Sonoma County (CALUP) includes a description of the referral area boundaries, noise compatibility standards, safety compatibility standards, airspace protection standards, and other land use policies for the six public use airports in the County, including the Healdsburg Municipal Airport. The plan area is located within two miles of the Healdsburg Municipal Airport, and thus, within the CALUP area. As described in the City's General Plan EIR the plan area is located outside of the referral area boundary

and other county airport zones. Therefore, referral to the Sonoma County Airport Land Use Commission (ALUC) is not required. The plan does not propose any change in land use designations for the property. Therefore, the proposed plan would not expose people residing and working within the plan area to a safety hazard regarding operation of a public airport, and impacts would be less than significant. This topic will not be further evaluated in the EIR.

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 impact. No private airstrips are located near the plan area. This condition precludes the possibility of exposing persons who reside or work within the plan area to aviation hazards. No impact would occur. This topic will not be further evaluated in the EIR.

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

Less than significant impact with mitigation incorporated. The City and County do not have adopted emergency response plans. According to the City's Circulation Plan Map, Healdsburg Avenue is designated an arterial street. Healdsburg Avenue is within the plan area and borders the eastern side of the plan area. Thus, the roadway is used for emergency response and could be used for evacuation purposes. Improvements along the east side of Healdsburg Avenue are planned as part of an approved neighboring development, Montage Healdsburg, which includes changes to the roadway and utilities, bicycle lanes, sidewalks, lighting and landscaping. The existing private railroad crossing at the entry to the plan area would be converted to a public railroad crossing and improved with crossing gates and train signalization. A 70-foot-wide right-of-way would also be transferred to the City and include two travel lanes and one left-turn lane to provide access into the project plan. In addition, a new City fire station is planned with driveway access directly opposite the proposed plan entryway.

The proposed plan includes modifications to Healdsburg Avenue. Future signalization for the new intersection of the crossing road and Healdsburg Avenue is planned to avoid potential traffic congestion or backups on Healdsburg Avenue. The modifications would not impair or interfere with emergency response or evacuation (e.g. permanent road closures, lane narrowing, etc.). However, the plan area currently has just a single access across the NCRA railway. Given the size of the proposed development and the potential need for plan area evacuation in the case of wildfires or other emergencies, the lack of secondary emergency vehicle access to the plan area represents a potentially significant impact. Impacts would be reduced to less than significant with implementation of MM HAZ-2. This topic will not be further evaluated in the EIR.

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 with mitigation incorporated. The City General Plan mapped areas for potential development in sub-areas throughout the City limit/Urban Growth Boundary (Figure III-7). The City General Plan included mapped areas with high to moderate risks of wildland fire (Figure

IV.H-1). High fire zones are generally characterized by wooded hillsides and ridges, open space, and low density/intensity land uses. The areas east of the City are generally located in a high wildfire area whereas downtown Healdsburg, largely urbanized or surrounded by infrastructure, precludes exposing people or structures to significant risk of wildland fires.

The plan area is located in the northwest portion of Development Sub-Area D, and neighbor Development Sub-Area C directly to the east. The plan area is considered at moderate risk of wildland fire hazards. High fire zones are located approximately 0.25 mile to the south/southeast of the plan area (Sub-Area A). The plan area and project plan is undeveloped and contains mostly grassland with sloping hillsides and woodland vegetation to the north and southwest.

Consistent with the General Plan EIR, the risk of exposure to wildland fires would be minimized through design measures and building practices. Policies S-D-1 through S-D-5 ensures that development in at-risk area implements appropriate design and building materials. In addition, a new fire station opposite of the plan area is planned, which may result in improved response times to fires. Therefore, with implementation of MM HAZ-2, the potential increased exposure of people or structures to wildland fires would be minimized, and the impact would be less than significant. This topic will not be further evaluated in the EIR.

Mitigation Measures

MM HAZ-1 The following requirement shall be imposed as a condition of approval prior to all development within the plan area: The Comstock property developer shall prepare a dust control plan that specifies measures to reduce fugitive dust emissions during construction. The developer shall also prepare an asbestos dust mitigation plan to be submitted to and approved by BAAQMD, in accordance with 17 CCR Section 93105 and 8 CCR Section 1529.

MM HAZ-2 The following requirement shall be imposed as a condition of approval prior to or concurrent with all development within the plan area: The Comstock property developer shall provide a secondary emergency vehicle access point to facilitate more orderly and efficient levels of development and minimize delaying emergency response times. Potential location options for secondary emergency access include, but are not limited to, a second railroad crossing over the NCRA railway north of the main entrance or a new route south of the plan area through the vacant parcel owned by SIMI Winery, Inc. (APN 091-060-032) and into the plan area. If secondary emergency access is not provided to satisfy fire safety standards, development on the Comstock property will be limited to the extent allowed under applicable fire safety regulations, codes, and ordinances.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of

commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. As such, implementation of the aforementioned identified cumulative projects in combination with the proposed plan could result in wildfire- and emergency response-related impacts or accidental release of hazardous materials, which could in turn result in cumulative exposure of persons or structures to hazards and hazardous materials. However, with adherence to federal, State, and local laws related to transport, use, and disposal of hazardous materials, and compliance with the Uniform Fire Code and emergency response procedures as well as project-specific hazards and hazardous materials recommendations (i.e., mitigation measures) by project proponents for the identified cumulative projects and the proposed plan, the cumulative hazards and hazardous materials impact would be less than significant. This cumulative topic will not be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
9. Hydrology and Water Quality <i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Conditions

The plan area is located in the City of Healdsburg and subject to water quality regulations established by the North Coast Regional Water Quality Control Board. The Russian River and Foss Creek are the two main surface waters in the City of Healdsburg. The plan area does not contain any water bodies, rivers, or streams but does contain two existing 48-inch- and 36-inch-diameter culverts that convey stormwater. There are drainage ditches in the plan area that convey stormwater to these culverts. The plan area is not located within a designated Federal Emergency Management Agency (FEMA) 100-year floodplain.

Environmental Evaluation

Would the project:

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

Less than significant impact. The plan area currently is undeveloped with no structures or impervious surfaces. However, the City anticipates development in the plan area to consist of new residential and commercial land uses. Only minor grading and trenching is anticipated as mass grading of the plan area has already occurred. However, future grading and excavation activities may result in temporary impacts to surface water quality. Surface runoff that flows across the plan area may contain sediments that may be discharged into the storm drainage system. For construction of projects that would disturb more than one acre of soil, compliance with the NPDES General Permit for Construction Activities is required.

City of Healdsburg Ordinance No. 1091 requires all new residential, commercial, office, industrial, public or quasi-public construction that requires design review and/or a building or grading permit prepare a SWPPP. Sediment and erosion controls are required to protect water quality while a site is under construction. Foss Creek, located on the southeastern portion of the plan area, would need to be protected during all construction activities from this runoff. A detailed list of BMPs must be included in the SWPPP to prevent the discharge of pollutants. Future projects contemplated in the proposed plan with implementation of best management practices (BMPs) would not result in significant construction-related water quality impacts.

The proposed plan would redevelop the area with new residential and commercial development. The new projects would be required to meet post-construction stormwater treatment standards. New storm drains would be located along newly developed roads, private driveway, and Healdsburg Avenue. Project applicants would also be required to prepare a Standard Urban Stormwater Mitigation Plan (SUSMP) in compliance with the RWQCB requirements and the City's regulatory policies pertaining to stormwater runoff—including rain gardens to retain water and allow for infiltration, and vegetated swales—and incorporate BMPs into project designs and, according to the SUSMP, capture and infiltrate the total runoff from the project from an 85th percentile, 24-hour storm. Therefore, impacts to water quality and waste discharge requirements would be less than significant. This topic will not be further evaluated in the EIR.

- 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 City would provide the project with potable water service, which it obtains from well fields located along the Russian River and Dry Creek. According to the General Plan, the City has the rights to 3,376 acre-feet of water, with as much as 4,179 acre-feet available to supplement municipal water sources. According to the recently adopted 2015 Urban Water Management Plan, the City does not use any groundwater supplies as a municipal water source. Therefore, impacts related to groundwater supplies would be less than significant. This topic will not be further evaluated in the EIR.

- 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. The proposed plan contemplates development on a vacant site with new residential and commercial land uses. Future projects would install a storm drain system that would collect runoff and discharge it to the off-site public system. Where possible, runoff would be directed to landscaped areas for filtration and infiltration. As stated above, stormwater drains would be located along the newly developed roads, private driveways, and planned improvements to Healdsburg Avenue. The plan area's drainage would also comply with the RWQCB requirements and with the City's regulatory policies pertaining to stormwater runoff. No alteration of the course of any stream or river would occur that would result in substantial erosion or siltation. In addition, a SWPPP must be added to the engineering phase of construction as required by the City's Stormwater Management Program. Implementation of the SWPPP would ensure the impacts of erosion or siltation would be less than significant. This topic will not be further evaluated in the EIR.

- 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. As described above, the proposed plan contemplates development on a vacant site. Future projects would install a storm drain system that would collect runoff and discharge it to the off-site public system. Stormwater drains would be located along the newly developed roads, private driveways, and Healdsburg Avenue. As discussed in impact 9a), above, future projects would prepare a SUSWMP to comply with the RWQCB requirements and the City's regulatory policies pertaining to stormwater runoff. Where possible, runoff would be directed to landscaped areas for filtration and infiltration. In addition, bioretention beds (rain gardens) would provide stormwater treatment and reduce the amount of post-development stormwater runoff. Development is subject to compliance with Low Impact Design standards, which are applied as a requirement of development through reviews conducted by the City Department of Public Works. This includes but is not limited to disconnected roof drains, interceptor trees, and appropriately selected plants incorporated into the design. No alteration of the course of any stream or river would occur as a result of implementation of the plan. Therefore, impacts would be less than significant. This topic will not be further evaluated in the EIR.

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. Future projects would result in the creation of new impervious surfaces in the form of driveways and rooftops. However, compliance with the existing regulations including NPDES permit conditions, and the provisions of the City’s Municipal Code would reduce impacts to the maximum extent practicable and impacts would be less than significant. Compliance with the City’s Municipal Code and the City’s suggested Conditions of Approval would mitigate project impacts to less than significant levels. As such, impacts would be less than significant. This topic will not be further evaluated in the EIR.

f) Otherwise substantially degrade water quality?

Less than significant impact. As stated above in impact 9a), construction activities related to projects could introduce pollutants and sediment into water runoff from the site. Future project applicants would be required to fulfill requirements regarding the provision of site design measures, source controls, Low Impact Development treatment measures, hydromodification management, and construction BMPs that are appropriate for the type and size of the project to control stormwater pollution. As described above, under the City’s Standard Storm Water Management Plan Guidelines, BMPs to avoid erosion and off-site discharges of water runoff would be implemented. Implementation of these BMPs would avoid water quality impacts to adjacent lands and waterways. Accordingly, impacts would be less than significant. This topic will not be further evaluated in the EIR.

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?

No impact. As identified in the General Plan EIR, the plan area is not located within a FEMA designated Special Flood Hazard Area subject to inundation in the event of a 100-year flood (Figure IV.I-1). Therefore, no impact would occur. This topic will not be further evaluated in the EIR.

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

No impact. As stated above, the plan area is not located within a FEMA designated Special Flood Hazard Area subject to inundation in the event of a 100-year flood. Therefore, no impact would occur. This topic will not be further evaluated in the EIR.

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. According to the City General Plan, flood control for the lower Russian River is provided primarily by Warm Springs Dam. The dam is located on Dry Creek, a tributary of the Russian River, located approximately 10 miles northwest of the City. Lake Sonoma was created by this dam. Coyote Dam is an earthen dam located on the East Fork of the Russian River above Ukiah in Mendocino County. The dam is part of a system that provides water to Mendocino, Sonoma, and Marin counties. Although Warm Springs Dam was built on a medium-size fault, it was designed to absorb the maximum expected ground shaking. Failure of this dam could inundate most of the City to an elevation of 230 feet.

The plan area is located within an area that is located below 230 feet, according to the Healdsburg General Plan EIR Figure IV.1-2. To address potential impacts, the General Plan requires implementation measures proposed for the revised Safety Element of the proposed General Plan include S-4 which states that the City will “Maintain and periodically update the City’s Emergency Operations Plan, Recovery Manual and Hazard Mitigation Plan. As part of the periodic updates, the City shall review county and state emergency response procedures to ensure that they are coordinated with city procedures” and S-5, which states that the City will “Conduct periodic emergency response exercises to test the effectiveness of City emergency response procedures.” These two implementation measures will assist in minimizing risks associated with flooding due to a dam failure. Although the proposed plan will increase the number of people exposed to the risk of flooding, emergency and evacuation plans developed by both the USACE and the City will reduce the risk of injury or death resulting from this flooding. Therefore, this impact would be less than significant. This topic will not be further evaluated in the EIR.

j) Inundation by seiche, tsunami, or mudflow?

Less than significant impact. The plan area location and topographical characteristics are not susceptible to the effects of a seiche, tsunami, or mudflows. A seiche affects locations adjacent to larger water bodies such as lakes or reservoirs. The plan area is not adjacent to an enclosed body of water and therefore is not susceptible to the effects of a seiche. The plan area is also not located near the Pacific Ocean and therefore is not susceptible to the effects of a tsunami. In addition, based upon the relatively flat topography immediately bounding the site, the potential for mudflow to affect the site would be minimal. Therefore, impacts associated with a seiche, tsunami, or mudflow are less than significant. This topic will not be further evaluated in the EIR.

Mitigation Measures

No mitigation measures are required.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. As such, implementation of the aforementioned identified cumulative projects in combination with the proposed plan could result in cumulative surface and groundwater quality-related impacts or drainage/runoff-related erosion, flooding, and stormwater system exceedance impacts. However, with adherence to the NPDES permit, a SWPPP as part of its Construction General Permit, and the City’s BMPs as part of its Low Impact Development manual as well as project-specific hydrology and water quality recommendations (i.e., mitigation measures) by project proponents for the identified cumulative projects and the proposed plan, the cumulative hydrology and water quality impact would be less than significant. This cumulative topic will not be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
10. Land Use and Planning <i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Conditions

The plan area is currently designated in the General Plan as MU (Mixed Use 10-16 UPA), Zoning Designation MU Mixed Use, and within the North Entry Special Study Area. The plan area was previously used as a lumber yard and mill until 2000 and improved for development in 2004. The plan area is now vacant and undeveloped.

Environmental Evaluation

Would the project:

a) Physically divide an established community?

Less than significant impact. The plan area consists of undeveloped private and publicly owned land, located in a transitional area between the rural character of Alexander Valley to the north and an urban character of the City to the south. The City General Plan recognized special study areas within Healdsburg with development potential and called for preparation of the North Entry Area Plan. The proposed plan is being developed consistent with existing General Plan guidelines as well as development policies, and thus consistent with City land use regulations.

Although individual components of the proposed plan would be constructed on vacant land, the plan area is designated mixed-use in the City General Plan. The City would conduct review of future specific projects to ensure that the mix of uses is compatible and consistent with the intent of the North Entry Area Plan. As such, buildout under the proposed plan would not physically divide an established community. Impacts would be less than significant. This topic will not be further evaluated in the EIR.

- 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 plan area is designated mixed-use in the General Plan. Policy LU-18 allows for nonresidential uses in mixed use areas but such uses should serve residents and/or visitors in a manner that does not undermine the role of the downtown as the commercial center of Healdsburg. The specific location of proposed development would not substantially alter the planned land use composition detailed in the General Plan. Moreover, the proposed plan is being developed to further City land use development objectives and would not conflict with any applicable land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating an environmental effect.

Development under the proposed plan could include components such as a senior community, residential apartments, a hotel, offices, and restaurants. Consistent with the General Plan, development on-site would be required to comply with applicable General Plan policies and land use regulations. As projects are proposed, the City would review them for compliance prior to approval of the necessary permits. As such, impacts would be less than significant. This topic will not be further evaluated in the EIR.

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

No impact. As noted above, Biological Resources, the proposed plan area does not conflict with any applicable habitat conservation plan or natural communities conservation plan. No impact would occur. This topic will not be further evaluated in the EIR.

Mitigation Measures

No mitigation measures are required.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. However, implementation of the aforementioned identified cumulative projects in combination with the proposed plan would not result in division of an established community or conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, the cumulative land use and planning impacts would be less than significant. This cumulative topic will not be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
11. Mineral Resources <i>Would the project:</i>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Conditions

The plan area has not historically supported mineral extraction activities and is not a known location for mineral deposits. A soils report prepared for the plan area indicates the underlying soils consist mainly of gravelly loams and clay loams. The primary mineral resources in the City consist of aggregate, sand, and gravel. No mineral extraction activities occur within the plan area.

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 State Mines and Geology Board designate Statewide sand and gravel deposits of regional significance. The Board identified terrace-mining pits along the Russian River as MRZ-2, located primarily along the riverbanks. Syar Industries currently processes sand and gravel at its Healdsburg Plant located along the Russian River approximately 3.5 miles south of plan area. General Plan Policy NR-G-1 expresses the City’s intent to allow for the continued use of properties along the Russian River for sand and gravel mining operations. The General Plan designated the plan area for mixed-use land use and it is not located in a mineral zone, as mapped in the General Plan EIR (Figure IV.K-1). Construction of proposed plan components would not result in the loss of mineral resources. Therefore, no impact would occur. This topic will not be further evaluated in the EIR.

- 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 plan area supported a lumberyard and mill operations until 2000. Previous buildings and structures were removed, and no historical mineral extraction activities are known to have occurred on-site. As explained above, the General Plan designated the plan area for mixed-use land uses and the plan area is not identified within or near a mineral zone. Therefore, construction of

proposed plan components would not result in the loss of availability of a locally important mineral resource. No impact would occur. This topic will not be further evaluated in the EIR.

Mitigation Measures

No mitigation measures are required.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. However, implementation of the aforementioned identified cumulative projects in combination with the proposed plan would not result in loss of availability of a known mineral resource of value to the region and the residents of the State. Thus, the cumulative mineral resources impact would be less than significant. This cumulative topic will not be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
12. Noise <i>Would the project result in:</i>				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Conditions

The plan area is currently undeveloped, vacant land which is adjacent to U.S. Highway 101 and Healdsburg Avenue. The primary noise sources in the plan area are traffic noise from these adjacent roadways, and temporary construction activity at a site across Healdsburg Avenue to the east.

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?**

Potentially significant impact. As indicated in General Plan EIR Figure IV.L-2, the plan area and project plan is currently exposed to noise levels in excess of 75 dbA CNEL associated with traffic noise on Highway 101 and Healdsburg Avenue. In addition, a freight rail line owned by the NCRA is expected to

service both freight trains and the future Sonoma-Marín Area Rail Transit (SMART) operations. As discussed above, the City may require new development to implement measures that reduce noise-related impacts in the Federal Railroad Administration (FRA)-designated “Quiet Zone” at the site entry/Healdsburg Avenue intersection. If the on-site Quiet Zone is not implemented, train horns would be required to sound resulting in noise levels ranging between 96 dBA and 110 dBA L_{max} as measured at 50 feet. While infrequent and intermittent, the use of train horns would cause a substantial increase in ambient noise levels in the vicinity.

The General Plan EIR identifies the noise exposure range of 61 dBA to 70 dBA CNEL to be “conditionally acceptable” for nursing homes and multi-family residential development. The EIR also identifies the noise exposure range of 67.6 dBA to 77.5 dBA CNEL to be “conditionally acceptable” for commercial development. The General Plan EIR notes that new development should be undertaken only after a detailed noise analysis that includes insulation features are included in project design. Impacts associated with noise exposure are potentially significant and thus will be further evaluated in the EIR.

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

Potentially significant impact. Ground vibration can be caused by temporary activities such as construction and regular, reoccurring activities such as truck and train movements. The NCRA and SMART District intend to operate train service along the railroad tracks that run along the eastern portion of the plan area. Construction near the tracks with noise-sensitive uses may be required to incorporate structural noise- and vibration-reduction measures to avoid significant groundborne vibration from trains. Therefore, this is considered a potentially significant impact and thus will be further evaluated in the EIR.

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

Potentially significant impact. The proposed plan contemplates redeveloping the plan area with a range of new land uses. The new uses would add new daily trips to local roadways, including those that experience existing noise levels of 70 dBA CNEL as shown in the City General Plan EIR Figure IV.L-2. This has the potential to cause a substantial permanent increase in ambient noise levels in the plan area vicinity. Additionally, buildout under the proposed plan would generate on-site, non-transportation noise from operational activities (loading/unloading activities, stationary mechanical equipment operation, etc.) that also have the potential to increase ambient noise levels. Accordingly, operational noise associated with the proposed plan is a potentially significant impact and thus will be further evaluated in the EIR.

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

Potentially significant impact. The proposed plan contemplates redeveloping the plan area with a range of new land uses. Construction activities would involve the use of heavy equipment that has the potential to expose surrounding receptors to substantial temporary increases in ambient noise

levels in the plan area vicinity. As such, construction noise associated with buildout of the proposed plan is potentially significant and thus will be further evaluated in the EIR.

- 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 nearest public airport to the project plan is the Healdsburg Municipal Airport, located approximately 1.3 miles northwest of the project plan. Because of its distance from the airport's runways, the project plan is located outside of the 55-dBA CNEL airport noise contours. Therefore, persons residing or working at the project plan would not be exposed to noise levels from airport activity that would be in excess of normally acceptable standards. Therefore, no impact would occur. This topic will not be further evaluated in the EIR.

- 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. No private airstrips are located within two miles of the plan area. This condition precludes the possibility of exposing persons residing or working in the plan area vicinity to excessive aviation noise from private airstrips. Therefore, no impact would occur. This topic will not be further evaluated in the EIR.

Mitigation Measures

No mitigation measures have been identified at this time. Impacts associated with this topic will be further evaluated and, if necessary, mitigated in the plan and/or EIR.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. As such, implementation of identified cumulative projects in combination with the proposed plan would result in cumulative noise and vibration, which could in turn result in exposure of persons to noise and vibration levels in excess of standards established in the General Plan or noise ordinance. This is a potentially significant cumulative noise impact and, thus, will be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
13. Population and Housing <i>Would the project:</i>				
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Conditions

As discussed in the Healdsburg Housing Element 2015–2023, the average City household size was 2.56 persons per household. In addition, according to the Association of Bay Area Governments (ABAG), the City had a population of 11,267 in 2010. The proposed plan area does not contain existing homes and is currently vacant, undeveloped land.

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. The proposed plan contemplates redevelopment of the plan area with new residential and commercial land uses. Based on preliminary concept plans for the Comstock site, anticipated future uses could include: an independent senior living community, a boutique hotel, commercial uses, and multifamily housing. This mix of uses is consistent with mixed use land use designations, mixed use zoning, and the 290 residential units and 200,000 square feet of commercial development anticipated within the North Entry Area Plan.

The General Plan projects population at full City buildout to be 11,600 in 2020 and 12,300 in 2030. Consistent with the General Plan and anticipated buildout in the Healdsburg Housing Element 2015–2023, the proposed plan would accommodate population growth with new residential units and commercial development consistent with the land use designation and within anticipated buildout

under the General Plan. Therefore, the impact would be less than significant. This topic will not be further evaluated in the EIR.

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

No impact. The plan area does not currently contain dwelling units. This condition precludes the possibility of displacement of existing housing. No impact would occur. This topic will not be further evaluated in the EIR.

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

No impact. The plan area does not currently contain any dwelling units. This condition precludes the possibility of displacement of persons. No impact would occur. This topic will not be further evaluated in the EIR.

Mitigation Measures

No mitigation measures are required.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. However, implementation of the aforementioned identified cumulative projects in combination with the proposed plan would not induce substantial population growth or result in substantial displacement of housing or persons. Thus, the cumulative population and housing impact would be less than significant. This cumulative topic will not be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
14. Public Services				
<i>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:</i>				
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Conditions

The plan area is within the City of Healdsburg and would be served by the City of Healdsburg Fire Department, Police Department, Healdsburg Unified School District, City of Healdsburg Parks and Recreation, and Healdsburg Regional Library. The closest fire station to the plan area is the CAL FIRE Healdsburg Station located approximately one mile to the north. In addition, the closest City of Healdsburg fire station is located 1.94 miles to the south. The closest police station is located approximately 2.34 miles to the south.

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. The plan area is located between U.S. Highway 101 and Healdsburg Avenue in the northern end of the City. Consistent with the General Plan, the plan contemplates development on a currently vacant site with a mix of residential and commercial uses. The plan area is located approximately two miles north of the Healdsburg Fire Station at the northwest corner of Healdsburg Avenue and Grant Street. The fire station currently has three Type 1 fire engines and one Type 2 engine, one ladder truck, and three utility vehicles. Staffing resources include 11 full-time firefighters, 12 paid personnel and 18 Reserve Firefighters.

The General Plan EIR evaluated whether development facilitated by the General Plan would require fire protection that exceeds current staffing or facilities in order to maintain acceptable service and

performance objectives. According to the General Plan and General Plan EIR, the average response time for the Healdsburg Fire Department is 4 minutes and 2 seconds; response times to the more rural locations in the plan area may take as long as 6 minutes. The City identified sub-areas for development potential, including areas in the northern city limits, which may require additional fire department staff to maintain response times. However, the increased demand for fire protection services would be gradual and incremental over the 20-year period of the General Plan.

Future development contemplated in the plan area would not itself require a new fire substation. The plan area is located in the northern portion of the City and development of the site with mixed uses is already contemplated under the General Plan. Future development is not expected to substantially increase response times. The proposed plan is consistent with General Plan guidance and regulations and future development would also be required to incorporate safety measures including fire hydrants and fire-resistant building materials as well as other fire protective measures.

As discussed in the General Plan EIR, the City evaluated the impact of the Montage Healdsburg development project, a large residential development, located opposite of the plan area. Because of the distance between the City's existing fire station and Montage Healdsburg, the development project included the construction a fire substation, thereby reducing response times to the project area. The new substation would service the plan area and proposed plan, and thus would maintain an acceptable response time.

Key to fire protection is capacity of the water system to provide sufficient flow for firefighting purposes. The current water system meets fire flow demand and any new development would be required to comply with all applicable Fire Code requirements associated with adequate fire access, fire flows, and number hydrants. The Montage Healdsburg development improvement plans propose to extend two 12-inch water mains adjacent to the plan area that would provide a water distribution system for new development. In addition, improvements to provide water services to the plan area are being coordinated with the Montage Healdsburg development project. If development of the plan area is pursued before the improvements approved for development of the Saggio Hills Area Plan are completed, then the developer of the Comstock property would be required to complete this work. Furthermore, General Plan Policy PS-E-2 requires all new mixed-use developments to have built-in fire protection equipment, which is assured at the time of construction with development permits. Therefore, impacts would be less than significant. This topic will not be further evaluated in the EIR.

b) Police protection?

Less than significant impact. The Healdsburg Police Department Headquarters is located at 238 Center Street, approximately 2.33 miles south of the plan area.

As discussed in the General Plan EIR, the City considered whether new residential and commercial development would increase police staffing or facility needs. Development facilitated by the General Plan would increase demand for police protection and increase the number of service calls received by the Police Department. General Plan policies S-E-1 through S-E-4 address the City's police staffing needs and coordinate new development with police facility improvements. The City of Healdsburg

Police Department is responsible for monitoring and maintaining adequate staffing to meet the City's service requirements, as discussed for buildout in the General Plan. While the City anticipates the need for additional officers and facilities in the future, the City will assess development impact fees from new development that are sufficient to maintain adequate police service levels.

The plan area is located in northern portion of the City and development of the site with mixed uses as contemplated under the General Plan. Future development is not expected to substantially increase police response times. The proposed plan is consistent with General Plan guidance and regulations. Development under the proposed plan would be required to incorporate safety and security measures, including parking lot lighting and other loss prevention measures to deter and prevent criminal activity. Development plans are routinely referred to the Police Department for review and comment, to assure safety concerns are considered and addressed. This includes ensuring that adequate lighting of walkways, parking lots, and entryways is provided and shown on plans. Existing facilities can accommodate police service needs at the assumed future full-built of the General Plan. Development under the proposed plan would not physically alter police facilities, increase the need for new or altered police facilities, or cause the construction, which could cause significant environmental impacts. Therefore, impacts would be less than significant. This topic will not be further evaluated in the EIR.

c) Schools?

Less than significant impact. The proposed plan contemplates the development of up to 290 residential units. The added residents would result in an increased demand for school services. The plan area is located in the Healdsburg Unified School District (HUSD), which includes two elementary schools, a junior high, and a high school. The HUSD enrolls about 2,200 students per year with a capacity to accommodate up to 3,900 students. In addition, several non-HUSD schools add to student enrollment capacities. Based on a student generation rate of 0.6 per residential dwelling unit, as provided by the General Plan EIR, the proposed plan could generate as many as 174 new students. The proposed residential-unit development is consistent with the buildout scenario of the General Plan. The project would contribute developer fees, pursuant to state law, to fund the construction or maintenance of school facilities and school services. Therefore, the proposed plan would not create a need for new or expanded school facilities. The impact would be less than significant. This topic will not be further evaluated in the EIR.

d) Parks?

Less than significant impact. The proposed plan contemplates a mixed-use development that could include such uses as a senior community, a boutique hotel, a commercial office complex, and multi-family housing. The mixed use zoning standards in Healdsburg Municipal Code Section 20.08.175.B require a minimum of 200 square feet of usable open space for each dwelling. Thus, future multi-family development would include usable open space for future resident. The proposed plan would not remove existing parkland but would increase demand on park services.

General Plan Policy PS-H-4 sets a minimum citywide ratio of 5.0 acres of parkland per 1,000 residents for planning purposes. The City's 2030 General Plan Background Report identified

approximately 43-acres of public parkland, including the City's seven neighborhood and community parks. The existing 3.50-acre Barbieri Brothers Park is located approximately 1,100 feet southeast of the plan area, which provides local residents with walking paths, playgrounds, and sport facilities. In addition, the 155-acre Healdsburg Open Space Preserve is located approximately 0.33 mile southeast of the plan area.

The General Plan indicated a 16-acre parkland deficiency towards meeting the City's goal of park acreage relative to its population. The City is in the process of updating its Parkland Mitigation Fees (per the Quimby Act), and new development would be required to pay development impact fees and/or provide on-site parks. Furthermore, the City recently approved an approximately 36-acre community park that will be constructed as part of the Montage Healdsburg project, located across from the plan area. The City also has a joint use agreement with the Healdsburg Unified School District to utilize its fields for recreational activities. The City's Community Services Department, in addition to other responsibilities, would operate and maintain the City's system of parks and recreational facilities. Therefore, impacts to existing and planned parks would be less than significant. This topic will not be further evaluated in the EIR.

e) Other public facilities?

Less than significant impact. Development envisioned under the proposed plan could create an increase in the demand for other public facilities. The Healdsburg Regional Library is located approximately two miles south of the plan area, and the Healdsburg Community Center is located approximately 0.76 mile south. Pursuant to State law, the City would require new development to pay impact fees that offset the costs associated with providing additional public services.

The proposed plan is consistent with the land use intensities and densities identified in the General Plan development assumptions at full-buildout. The General Plan did not identify any need for public facilities in the plan area and did not specifically evaluate whether new development facilitated by the General Plan would result in substantial adverse physical impacts. Therefore, it is expected that the development under the proposed plan would be served by existing and planned-for public facilities. Impacts would be less than significant. This topic will not be further evaluated in the EIR.

Mitigation Measures

No mitigation measures are required.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. However, implementation of the aforementioned identified cumulative projects in combination with the proposed plan would not result in substantial adverse physical impacts associated with the provision

of new or physically altered governmental facilities or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. Thus, the cumulative public services impact would be less than significant. This cumulative topic will not be further evaluated in the EIR.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Conditions

The existing 3.50-acre Barbieri Brothers Park is located approximately 1,100 feet southeast of the plan area, and provides local residents with walking paths, playgrounds, and sport facilities. In addition, the 155-acre Healdsburg Open Space Preserve is located approximately 0.33 mile southeast of the plan area.

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 plan would add residential development, and the resultant population would increase demand for and use of City parks. Greater use of City parks and recreational facilities may result in physical deterioration. However, population growth is only one factor in determining whether parks and recreational facilities would deteriorate through increased use. Other variables include park design, age, infrastructure, and park use.

The City currently operates and maintains a variety of parks and recreational facilities. There are seven neighborhood parks and community parks within the City, and several other county-owned park facilities nearby. The Barbieri Brothers Park located closest to the plan area provides local residents with walking paths, playgrounds, and sport facilities. In addition, as discussed in impact 14d), the City is planning a 34-acre community park as part of the Montage Healdsburg development project.

The proposed plan is consistent with the General Plan to provide a vision for redevelopment in the northern portion of the City. The proposed plan does not propose land use or zoning changes and would not change the type or extent of development allowed under the General Plan. Development pursuant to the proposed plan would still comply with the densities, standards, and design

guidelines permitted under the General Plan. Therefore, impacts on existing and planned park facilities are less than significant. This topic will not be further evaluated in the EIR.

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?

No impact. The proposed area plan does not include or require new park or recreation facilities. However, the plan's residential component would incorporate public common spaces, passive recreational outdoor areas, and possibly a tot lot or community garden. The plan is also consistent with the City General Plan. In addition, and as discussed above, the Meontage Healdsburg development project east of the plan area includes the construction of a new 36-acre community park with recreational facilities, which would serve residents as part of the proposed plan. The Healdsburg Open Space Preserve located less than 0.5 mile from the plan area offers a trail network of 3 miles of hiking trails through grasslands, oak woodlands, wetlands, and chaparral. Therefore, the proposed plan and the proposed plan's increased demand on recreational facilities would not have an adverse physical effect on the environment. No impact would occur. This topic will not be further evaluated in the EIR.

Mitigation Measures

No mitigation measures are required.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. However, implementation of the aforementioned identified cumulative projects in combination with the proposed plan would not result in increased use of existing recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated; nor would the proposed plan include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Thus, cumulative public services impacts would be less than significant. This cumulative topic will not be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
16. Transportation/Traffic				
<i>Would the project:</i>				
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Existing Conditions

Plan area access is currently available from a driveway located on the west side of Healdsburg Avenue approximately 150 feet south of the Healdsburg Avenue/Passalacqua Road intersection. Traffic counts along Healdsburg Avenue determined that average traffic volumes in the vicinity of the plan area are 5,340 vehicles per day.

Environmental Evaluation

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?**

Potentially significant impact. The proposed plan contemplates the redevelopment of a graded, vacant site with a range of new residential and commercial land uses. The new uses could result in different peak-hour impacts, and changes in local commute patterns. In addition, the uses would generate new traffic that may cause potentially significant impacts. These impacts could include traffic impacts within the plan area, at nearby intersections, or on the roadway network. This is a potentially significant impact. This topic will be further evaluated in the EIR.

- 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?**

Potentially significant impact. As noted above, the construction of residential and commercial uses as contemplated by the proposed plan could result in peak-hour traffic impacts. Potential impacts of buildout under the proposed development on regional freeways and local roadways, in conjunction with changing commute patterns and traffic intensities unrelated to the proposed plan may also cause potentially significant impacts. This is a potentially significant impact. This topic will be further evaluated in the EIR.

- 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?**

No impact. The plan area is located outside the Healdsburg Municipal Airport influence area. The plan area is located within two miles of the Healdsburg Municipal Airport, and thus, within the CALUP. As described in the General Plan EIR, only a few lots west of U.S. Highway 101 are located within the CALUP referral area and its traffic pattern as well as outer safety zones. All other potential development, including the plan area to the east of the highway, is located outside of the referral area boundary and all other county airport zones. This condition precludes the possibility of future projects altering air traffic patterns at the airport. No impact would occur. This topic will not be further evaluated in the EIR.

- 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 proposed plan contemplates development on an existing graded, vacant site with new residential and commercial land uses. Implementation of the proposed plan would facilitate new development in locations and/or specific design elements that require consistency

with regulations and proposed plan design standards intended to protect public safety. City regulations and standards require that public improvement plans and building plans for individual developments incorporate design requirements such as curbs, gutters, handicap access, adequate Fire Department access, and other measures to improve vehicle, bicycle, and pedestrian safety.

The proposed intersection of the new public street would be constructed across the NCRA/SMART rail tracks. As discussed above, the California Public Utilities Commission approved the conversion of the private at-grade roadway crossing at mile 70.85 to a public roadway crossing. The purpose of this action was to anticipate redevelopment of the plan area by providing adequate and safe ingress and egress with the anticipated resumption of freight and/or passenger rail traffic. The current access point is located approximately midway between horizontal curves along the rail tracks and thus maximizes sight distance in both directions. In addition, the entry point provides adequate distance between the intersection proposed for the plan area and the neighboring Montage Healdsburg development project, based on the City's standards for new public streets and intersections and the driveway entrance to the future fire substation.

The proposed area plan would include design standards. Future proposed development projects would be designed with sidewalks, pedestrian walkways, bus facilities, and bicycle routes to minimize potential hazards to pedestrians and bicyclists and to support these alternative transportation modes. Pedestrian facilities are included as part of the proposed plan. Therefore, impacts would be less than significant. This topic will not be further evaluated in the EIR.

Mitigation Measures

No mitigation measures have been identified at this time. Impacts associated with this topic will be further evaluated and, if necessary, mitigated in the EIR.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. As such, implementation of identified cumulative projects in combination with the proposed plan would result in inadequate emergency access or conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system or with a congestion management plan establishing level of service standards and travel demand measures for designated roads or highways. This is a potentially significant cumulative transportation/traffic impact and, thus, will be further evaluated in the EIR.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
17. Utilities and Service Systems <i>Would the project:</i>				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Existing Conditions

Although the plan area is vacant and undeveloped, the City of Healdsburg currently provides the plan area water, sewer, and electrical services.

Environmental Evaluation

Would the project:

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

Less than significant impact. The City of Healdsburg owns and operates sewage collection, treatment, and disposal facilities that would serve the plan area. The City's wastewater treatment

plant (WWTP) is located approximately one mile southwest of the city limits, on Foreman Lane just south of the confluence of Dry Creek and the Russian River. The WWTP is designed to accommodate a maximum daily flow of 4.0 million gallons per day (mgd), and a permitted dry-weather capacity of 1.4 mgd. As discussed in the City General Plan EIR, the unused capacity available for new development and growth under General Plan buildout is a minimum of 0.42 mgd.

New development contemplated by the proposed plan would increase demand on wastewater treatment facilities. However, the proposed plan contemplates development in a manner consistent with the General Plan. Thus, demands placed on the wastewater collection and treatment system would be consistent with the demands generated at General Plan buildout. Therefore, the WWTP would have sufficient capacity.

New development would also continue to comply with all provisions of waste discharge permits, which regulates discharges throughout the City. In addition, the City will continue to implement NPDES requirements, including requirements that businesses implement BMPs. Therefore, the proposed development within the plan area would not exceed the wastewater treatment requirements and impacts would be less than significant. This topic will not be further evaluated in the EIR.

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. As discussed in impacts 17a) and 17d), future projects within the plan area can be served with potable water and wastewater services by the City of Healdsburg without needing to expand an existing treatment facility. Water and sewer infrastructure would be extended to the site in coordination with the prior approved Montage Healdsburg development project and associated public improvement plans for improvements to Healdsburg Avenue. Consistent with environmental review conducted for the Montage Healdsburg development project, construction activities to serve the plan area would not result in significant environmental impacts. Future projects would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities, and impacts would be less than significant. This topic will not be further evaluated in the EIR.

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. The majority of the plan area is located on flat ground or relatively gentle topography. The plan area underwent mass grading to establish positive sheet flow drainage towards Healdsburg Avenue. Site drainage currently sheet flows in a southeasterly direction towards a drainage ditch along the eastern side of the plan area, parallel to the NCRA train track. In addition, an on-site collection, retention, and discharge drainage system was constructed to improve the overall quality of stormwater runoff.

The proposed plan contemplates new residential and commercial uses to redevelop the site. Future grading would be minimal, consisting of mainly minor cuts and fills necessary for road improvements,

parking areas, and building pads as well as site drainage. The new development would likely increase impervious surfaces; however, new development would incorporate General Plan policies that would reduce the quantities of stormwater runoff, and consequently reduce the need for additional stormwater facilities.

The State of California administers various aspects of the NPDES General Construction Permit. Given the size of the plan area and proposed uses, a SWPPP would be required to reduce stormwater discharges and prepared in compliance with the General Construction Permit. In addition, BMPs to control pollutants would be implemented through site design for proposed projects.

On-site stormwater detention and treatment would be in compliance with the Sonoma County Standard Urban Storm Water Mitigation Plan (SUSMP) manual. In accordance with C.3 requirements, peak runoff flows would be detained during peak storm events and released at a rate no greater than the pre-development peak runoff flows. This would ensure that downstream drainage facilities are not inundated by project-related runoff, which precludes the need for new or expanded facilities. Impacts would be less than significant. This topic will not be further evaluated in the EIR.

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 City of Healdsburg's water system is supplied from three well fields: one on Dry Creek with three operational wells and two on the Russian River with eight operational wells. The plan area is located within the City's service area; mixed-use development has been planned consistent with the General Plan (sub-area D), and increased water demand from buildout was accounted for in the City's Urban Water Management Plan (Table IV.P-4). Consistent with the analysis of projected water demand contained in the management plan for the City service area, the City's existing water rights provide sufficient water supplies to serve the plan area. Therefore, impacts would be less than significant. This topic will not be further evaluated in the EIR.

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. The City owns and operates sewage collection, treatment, and disposal facilities that would serve the plan area. The City's wastewater treatment plant (WWTP) is designed to accommodate a maximum daily flow of 4.0 mgd, and a permitted dry-weather capacity of 1.4 mgd. As discussed in impact 17a), above, the unused capacity available for new development and growth under General Plan buildout is a minimum of 0.42 mgd.

New development proposed in the plan area would increase demand on wastewater treatment facilities. However, the proposed plan contemplates development in a manner consistent with the City General Plan. Thus, demands placed on the wastewater collection and treatment system would be consistent with the demands generated at General Plan buildout. Therefore, the WWTP would

have sufficient capacity and impacts would be less than significant. This topic will not be further evaluated in the EIR.

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

Less than significant impact. Redwood Empire Disposal collects solid waste and hauled to the Healdsburg Transfer Station. The transfer station is currently permitted to accept 435 tons per day (tpd) and accepts approximately 206 tpd. The estimated increase in solid waste generated at assumed General Plan buildout is estimated at 15.8 tpd. Consistent with the General Plan, the plan area contemplates to redevelop the vacant site with new land uses. Therefore, the transfer station has sufficient permitted capacity to accommodate solid waste disposal needs associated with new development.

From the transfer station, solid waste is transported to four landfills available to Sonoma County. As discussed in the General Plan EIR, landfill facilities have a remaining permitting capacity of more than 22 million tons (Table IV.P-5). Therefore, landfills servicing the plan area would have sufficient permitted capacity to accommodate future development, and impacts would be less than significant. This topic will not be further evaluated in the EIR.

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

No impact. The City requires future development projects to comply with applicable federal, State, and local regulations related to solid waste. Since development under the proposed plan would be consistent with General Plan guidance and regulations, it also would not impede the ability of the City to meet waste diversion requirements or cause the City to violate other applicable federal, State, and local regulations related to solid waste. No impact would occur. This topic will not be further evaluated in the EIR.

Mitigation Measures

No mitigation measures are required.

Cumulative Impacts

As previously noted in Section 1.6, the anticipated cumulative buildout under the General Plan could result in the construction and operation of up to 872 additional residential units, 52 mixed-use units, 339 hotel rooms, 995,975 gross square feet of industrial uses, 507,508 gross square feet of commercial space, 551,683 gross square feet of retail space, 15,000 gross square feet of mixed-use space, and 20,000 gross square feet of office uses within the City of Healdsburg. However, implementation of the aforementioned identified cumulative projects in combination with the proposed plan would not exceed water supplies, landfill capacity, or wastewater treatment capacity or requirements of the applicable Regional Water Quality Control Board or 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. Thus, the cumulative utilities and service systems impact would be less than significant. This cumulative topic will not be further evaluated in the EIR.

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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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. As described in Section 2.4, Biological Resources, the proposed plan would not result in significant adverse environmental impacts to wildlife or plant species. In addition, the proposed plan would not adversely affect geology/soils or hydrology/water quality. With implementation of MMs BIO-1, BIO-2, CUL-1, CUL-2, and CUL-3, the proposed plan would not degrade the quality of the environment at a project- or cumulative-level in terms of biological resources, geology/soils, hydrology/water quality, or cultural resources.

- 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)?**

Potentially significant impact. The combined effects of past, current, and future projects in combination with the proposed plan could result in significant cumulative impacts related to aesthetics, air quality, GHG emissions, noise, and transportation/traffic. As such, the proposed plan could make a cumulatively considerable contribution to related cumulative environmental impacts. This would be a potentially significant cumulative impact related to aesthetics, air quality, GHG emissions, noise, and transportation/traffic. These cumulative topics will be further evaluated in the EIR.

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

Potentially significant impact. The proposed plan would not affect public services, utilities, recreation, mineral resources, land use planning, agriculture/forestry resources, or population/housing balance. With implementation of the mitigation measures discussed in the Section 2.7, Hazards and Hazardous Materials, the proposed plan would also not expose human beings to significant risks related to hazards/hazardous materials. Therefore, with implementation of Mitigation Measures HAZ-1 and HAZ-2, the proposed plan would not cause direct or indirect substantial adverse effects on human beings at a project- or cumulative-level in terms of public services, utilities, recreation, mineral resources, land use, agriculture/forestry resources, population/housing, or hazards/hazardous materials.

However, the proposed plan could cause substantial adverse aesthetics/visual quality effects with respect to views, light, and glare within the plan area and surrounding areas. The proposed plan could also make sizable contributions to traffic, noise, air quality, and GHG emissions. Thus, there would be a potentially significant impact related to direct or indirect substantial adverse effects on human beings at a project- or cumulative-level in terms of aesthetics, light and glare; transportation/traffic; noise; air quality; and GHG emissions. These topics will be further evaluated in the EIR.

SECTION 3: LIST OF PREPARERS

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