

Dry Creek Commons Project
Draft Initial Study/
Mitigated Negative Declaration

JULY 2022

PREPARED FOR

**City of Healdsburg
Community Development Department
401 Grove Street
Healdsburg, California 95448**

PREPARED BY

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**DRY CREEK COMMONS PROJECT
DRAFT INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION**

Prepared for

City of Healdsburg
Community Development Department
401 Grove Street
Healdsburg, California 95448
Attn: Ellen McDowell, Senior Planner

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July 2022

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Acronyms and Abbreviations

°F	degrees Fahrenheit
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADA	Americans with Disabilities Act
ADWF	highest dry weather flow
Afy	acre-feet per year
AG	Agriculture
amsl	above mean sea level
APE	area of potential effects
BAAQMD	Bay Area Air Quality Management District
BACT	best available control technology
BHDC	Burbank Housing Development Corporation
BMP	best management practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
California Register	California Register of Historical Resources
Caltrans	California Department of Transportation
CAP	Sonoma County Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CDOC	California Department of Conservation
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
City	City of Healdsburg
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂	carbon dioxide
CWMP	Construction Waste Management Plan
dB	decibel
dB(A)	A-weighted decibel
DPM	diesel particulate matter

EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FIRM	Flood Insurance Rate Map
GHG	greenhouse gas
gpd	gallons per day
HAP	Hazardous Air Pollutant
HFD	City of Healdsburg Fire Department
HPD	City of Healdsburg Police Department
HUSD	Healdsburg Unified School District
in/sec	inches per second
IS/MND	Initial Study/Mitigated Negative Declaration
Ldn	day-night sound level
Leq	equivalent sound level
Lmax	maximum sound level
Lmin	minimum sound level
mg	million gallons
mgd	million gallons per day
MU	Mixed Use
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission
National Register	National Register of Historic Places
NWIC	Northwest Information Center
NCPA	Northern California Power Agency
NEPA	National Environmental Policy Act
NESHAPs	National Emission Standards for Hazardous Air Pollutants
NOA	naturally occurring asbestos
NPDES	National Pollution Discharge Elimination System
NSCAPCD	Northern Sonoma County Air Pollution Control District
OITC	Outside-Inside Transmission Class
OPR	California Governor's Office of Planning and Research
PG&E	Pacific Gas & Electric
PM ₁₀	particulate matter, 10 microns or less
PM _{2.5}	particulate matter, 2.5 microns or less
PPV	peak particle velocity

PRC	Public Resources Code
project	Dry Creek Commons Project
RFH	Reach for Home
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SC	Service Commercial
SCT	Sonoma County Transit
SMART	Sonoma-Marín Area Rail Transit
SR 128	State Route 128
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminant
U.S. 101	U.S. Route 101
USACE	U.S. Army Corps of Engineers
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
WQMP	Water Quality Management Plan
WWTP	wastewater treatment plant

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CITY OF HEALDSBURG
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “potentially significant impact” as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use and Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities and Service Systems |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input checked="" type="checkbox"/> Geology and Soils | <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENT IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature *Scott M. Duiven*

Date July 13, 2022

Printed Name

Scott Duiven, Community Development Director

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CHAPTER 1. PROJECT DESCRIPTION

1.1 INTRODUCTION

Project Title:	Dry Creek Commons Project Initial Study/Mitigated Negative Declaration
Lead Agency:	City of Healdsburg Community Development Department 401 Grove Street Healdsburg, CA 95448
City Staff Contact:	Ellen McDowell, Senior Planner
Project Applicants:	Burbank Housing Development Corporation (BHDC) 1425 Corporate Center Parkway Santa Rosa, California 95407

1.2 PURPOSE

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to identify any potential environmental impacts from implementation of the Dry Creek Commons Project (project) at 155 Dry Creek Road in Healdsburg, California. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15367, the City of Healdsburg (City) is the Lead Agency in the preparation of this IS/MND and any additional environmental documentation required for the project. This document also incorporates the Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report (2030 General Plan Update EIR) by reference.¹ The City has discretionary authority over the project, which will require approval of certain discretionary actions by the City and other governmental agencies. The intended use of this document is to determine the level of environmental analysis required to adequately prepare the project IS/MND and to provide the basis for input from public agencies, organizations, and interested members of the public.

The remainder of this section provides a brief description of the project location and the characteristics of the project. Chapter 2 includes an environmental checklist giving an overview of the potential impacts that might reasonably be anticipated to result from project implementation for each environmental resource topic. The analysis includes references to technical background studies in the appendix to this document and other information contained in the project's administrative record that provide the justification for the responses checked in the environmental checklist. Chapter 3 provides information on the Lead Agency, Project Applicant, and preparers of the IS/MND.

1.3 PROJECT LOCATION

The 3.7-acre project site, including the 3.53-acre parcel and the 0.17-acre off-site improvement area along the Dry Creek Road frontage, is located at 155 Dry Creek Road (Assessor's Parcel Number 089-071-

¹ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report*. Available at: <https://healdsburg.gov/355/General-Plan-Environmental-Impact-Report>, State Clearinghouse No. 2007082030, certified July 6, 2009. Accessed June 2022.

002). **Figure 1: Project Area** illustrates the location of the project site within the City and in northern Sonoma County. Architectural site plans are provided in **Appendix A**. The Town of Windsor lies 4 miles to the south and unincorporated Sonoma County lies to the east and west. The small unincorporated community of Geyserville is located 8 miles to the north, and the City of Cloverdale is located approximately 18 miles to the north.

Regional access to the project site is provided via U.S. Route 101 (U.S. 101), Healdsburg Avenue, and Dry Creek Road. U.S. 101 runs in a northwest-southeast orientation and is located approximately 800 feet west of the project site at its nearest point. Healdsburg Avenue is a primary north-south roadway. Dry Creek Road is an east-west arterial that connects ramps at U.S. 101 to Healdsburg Avenue to the east and Dry Creek Valley to the west. It has two lanes in each direction together with a center turn lane east of U.S. 101 except along the project frontage, where there is only one westbound lane.

The project site is also served by Sonoma County Transit (SCT). SCT Route 67 provides north and south loop service to destinations throughout Healdsburg with bus stops east of the project site on March Avenue and on Grove Street south of Dry Creek Road. SCT Route 60 provides regional service between Healdsburg and surrounding communities such as Cloverdale to the north and Santa Rosa to the south. There are bus stops in both directions on Healdsburg Avenue near Dry Creek Road. The Sonoma-Marín Area Rail Transit (SMART) right-of-way and railroad corridor is located immediately adjacent to the eastern boundary of the project site and is currently inactive. The SMART railroad corridor is planned for future passenger rail service operated by SMART. SMART is planning to construct stations in Cloverdale, Healdsburg, and Windsor, which would serve the project site.²

1.3.1 Surrounding Land Uses

The project site is in a built-up urban area and is bordered by commercial and industrial land uses, as shown in **Figure 2: Project Location**. Vacant undeveloped industrial land is located to the north and the Foss Creek riparian corridor is to the west. The SMART railroad corridor is located immediately adjacent to the eastern boundary. The Foss Creek Pathway is on the eastern side of the railroad tracks. Big John's Market, Round Table Pizza, and McConnell Chevrolet are located to the east of the SMART railroad corridor and Foss Creek Pathway. A 20-foot-wide easement associated with the Geysers wastewater pipeline is located along the entire length of the eastern side of the project site, within the project boundary; the pipeline also runs the length of the project frontage generally within the Dry Creek Road right of way.³ Dry Creek Road runs along the project site's southern project boundary. Hotel Trio and Hotel Vinea are located on the opposite side of Dry Creek Road to the south. The western boundary of the project site is formed by the Foss Creek riparian corridor. Within the project site there is a 35-foot-wide riparian setback from the top of the Foss Creek bank. Plank Coffee, as well as two residential units, are located west of the western project boundary on the opposite side of Foss Creek along Grove Street. The nearest residences are located on the same site as Plank Coffee approximately 63 feet west of the project site and the Foss Creek corridor, and at 1260 Grove Street (Citrine Apartments), approximately 360 feet south of the project site south of Dry Creek Road. As noted above, U.S. 101 is located approximately 800 feet west of the project site.

² Sonoma-Marín Area Rail Transit (SMART). 2021. Stations. Available at: <https://www.sonomamarintrain.org/stations>. Accessed June 2022.

³ The Geysers Recharge Pipeline is a 41-mile-long pipeline that transports recycled wastewater from the Laguna Treatment Plant in Santa Rosa to the Geysers geothermal fields in northern Sonoma County.

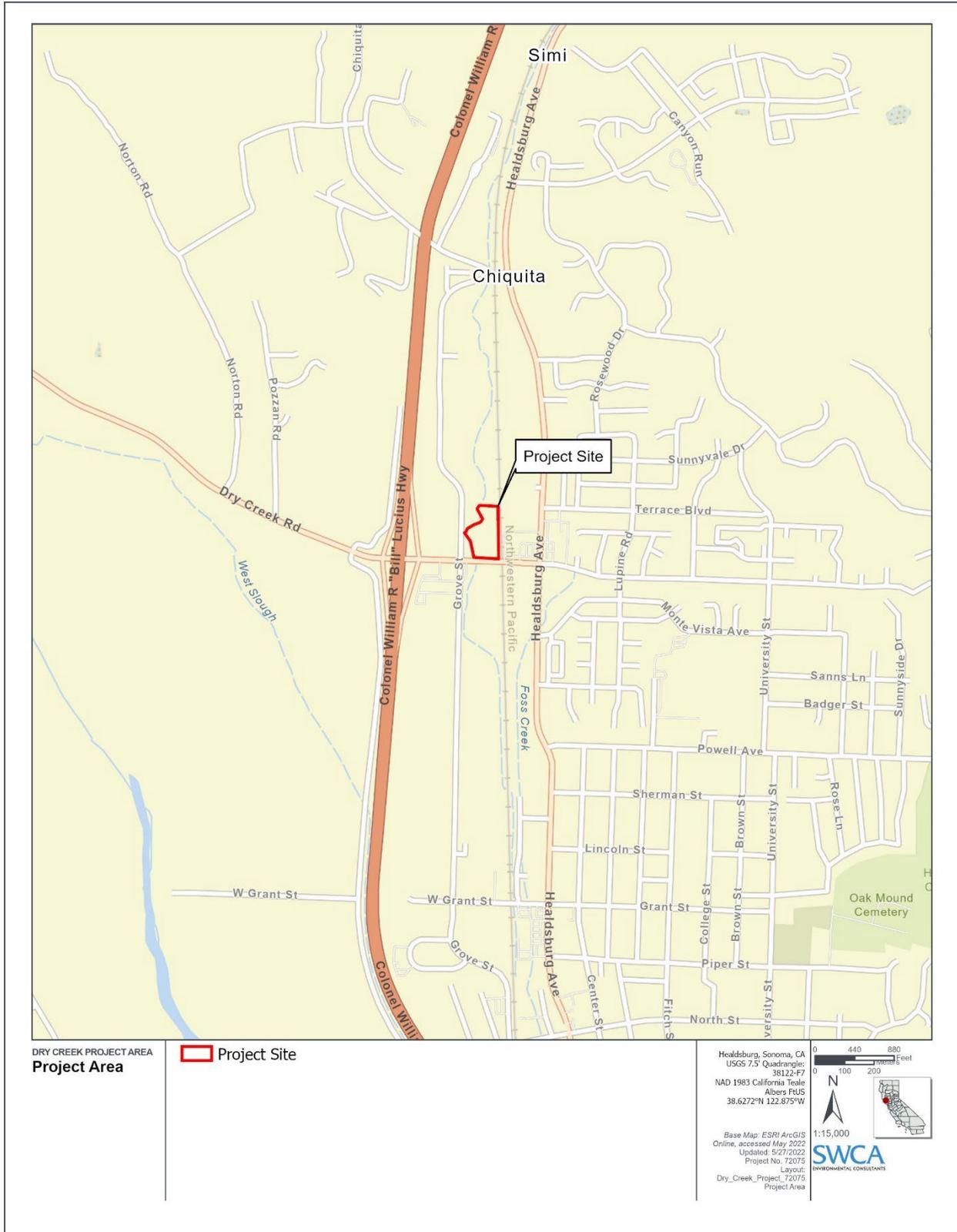


Figure 1: Project Area



Figure 2: Project Location

1.3.2 Zoning and General Plan Land Use

The project site is designated Mixed Use (MU) in the Healdsburg 2030 General Plan (2030 General Plan).⁴ The MU designation provides for nonresidential uses, including retail, office, services, visitor accommodations, public and quasi-public uses when compatible with the overall purpose and character of the designation. Stand-alone residential development up to 16 units per acre is allowed under the MU designation, provided it does not undermine the overall purpose and character of the designation.⁵ The MU designation allows for a maximum of 57 units; therefore, the project requests a State Density Bonus to allow for one additional unit, for a total of 58 units. The maximum allowable floor area ratio for development in the MU designation is 1.0; residential floor area shall not be counted when calculating the maximum floor area ratio. The project proposes a floor area ratio of 40 percent, less than the maximum allowed in the designation. As outlined in Municipal Code Section 20.08.170.B.2, the maximum height allowed on the project site is 40 feet, as the project site is located adjacent to a parcel also zoned MU.⁶ The project proposes a maximum height of 56 feet at the stair penthouse, in excess of the maximum height allowed in the designation; therefore, a waiver has been requested under State Density Bonus Law to allow for the additional height.

The project site is zoned Mixed Use.⁷ Per Section 20.08.155 of the Municipal Code, multifamily dwellings not a part of a mixed-use development are permitted by right in the MU zoning district.⁸ Per Section 20.28.105.B.1 of the Municipal Code, residential projects with two or more residential units per site which involve the development of vacant land with site and building improvements require Major Design Review, subject to the approval of the Planning Commission at a public hearing.⁹ The project proposes a maximum of 58 units on vacant land and associated on-site and off-site improvements and would be subject to Major Design Review.

Surrounding parcels to the north and west are designated as I for industrial uses. Parcels to the south, southwest, and west are designated as MU. Parcels to the east and southeast are designated as Service Commercial (SC) (see **Figure 2**).

⁴ City of Healdsburg. 2018. *Healdsburg 2030 General Plan*. The 2030 General Plan consists of the Policy Document (amended January 2015), the Land Use Map (amended April 2018), and the Background Report (amended January 2010). Available at: <https://healdsburg.gov/354/General-Plan>. Accessed June 2022.

⁵ City of Healdsburg. 2015. *Healdsburg 2030 General Plan Policy Document*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/634/General-Plan-Policy-Documents-PDF>. Accessed June 2022.

⁶ City of Healdsburg Municipal Code. Section 20.08.170 Maximum height of main structures. Available at: <https://www.codepublishing.com/CA/Healdsburg/#!/Healdsburg20/Healdsburg2008.html#20.08.155>. Accessed June 2022.

⁷ City of Healdsburg Zoning Map. 2019. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/836/Zoning-Map-PDF?bidId=>. Accessed June 2022.

⁸ City of Healdsburg Municipal Code. Section 20.08.155 Permitted and conditionally permitted uses: MU District. Available at: <https://www.codepublishing.com/CA/Healdsburg/html/Healdsburg20/Healdsburg2008.html#20.08.155>. Accessed June 2022.

⁹ City of Healdsburg Municipal Code. Section 20.28.105 Design review authority. Available at: <https://www.codepublishing.com/CA/Healdsburg/#!/Healdsburg20/Healdsburg2028.html#20.28.105>. Accessed June 2022.

1.4 EXISTING CONDITIONS

The project site is a 3.7-acre undeveloped infill site with street frontage on Dry Creek Road. It includes the 3.53-acre parcel and 0.17-acre off-site improvement area along Dry Creek Road. The site is covered in ruderal vegetation and contains no impervious surfaces, structures, or buildings (see **Figure 3: Project Site Existing Conditions: Site Photographs**). There are 59 existing trees on the project site, and none are heritage trees.¹⁰ The project site is roughly rectangular and relatively flat with elevation ranging between 135 feet above mean sea level (amsl) in the northeast and 125 feet amsl in the southwest. The project site consists of well drained soils with moderate infiltration rates.

Foss Creek and its associated 35-foot-wide riparian corridor setback form the western boundary of the project site. Two seasonal wetlands comprising a total of 0.57 acre are on the project site as well as 0.14 acre of waters of the United States and the state of California, connected to Foss Creek.¹¹ The two wetland features are a 0.53-acre wetland in the south-central portion of the project site that drains from the northeast to southwest towards Foss Creek, and a 0.04-acre wetland in the northeastern portion of the project site that is fed by a linear drainage under the railroad tracks that flows onto the property and towards Foss Creek in an east–west direction.

The Foss Creek Pathway is east of the project site and the SMART railroad tracks and crosses Dry Creek Road near the southeast corner of the project site. When all eight segments of the multi-use bicycle and pedestrian pathway are completed, it will run north–south through the City for approximately 4.1 miles as an 8- to 10-foot-wide asphalt-paved multi-use pathway.¹² The City completed the Foss Creek North segment that extends from along Dry Creek Road north to the intersection with Grove Street in October 2021.¹³ Southeast of the project site at the intersection of the Foss Creek Pathway and Dry Creek Road, a signalized pedestrian crossing allows cyclists and pedestrians to activate a signal to stop traffic in order to safely cross Dry Creek Road and cross the railroad tracks to continue travel on the Foss Creek Pathway.

The project vicinity is currently served by utilities, including water, wastewater, electricity, natural gas, and telecommunications. However, there are no utility services on the project site. The City’s Electric, Water, and Wastewater Department is responsible for delivery of electricity and water and for treatment of wastewater. Dry Creek Road currently contains a 12-inch-diameter water line, 36- and 48-inch-diameter storm drains, an 18-inch-diameter sanitary sewer line, a 6-inch-diameter natural gas pipeline, a 48-inch-diameter Geysers wastewater pipeline, and overhead electrical lines. The project does not include an interconnection with natural gas infrastructure in the Dry Creek Road right-of-way. A 20-foot-wide easement contains the Geysers wastewater pipeline that is located along the eastern boundary of the project site and adjacent to the southern project boundary within the Dry Creek Road right-of-way.

Police services are provided by the Healdsburg Police Department, and fire protection is provided by the Healdsburg Fire Department.

¹⁰ The tree survey did not include the portion of site within the 35-foot-wide Foss Creek riparian setback on the western portion of site because no work would occur in the creek or setback. Becky Duckles Consulting Arborist & Landscape Advisor. February 2022. *Arborist’s Summary*. (See **Appendix C-2**.)

¹¹ Wildlife Research Associates and Jane Valerius Environmental Consulting. 2022. *Biological Resources Assessment*. (See **Appendix C-1**.)

¹² City of Healdsburg. 2019. *Foss Creek Pathway Segments 7 & 8 Project Draft SIS/MND*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/9570/Foss-Creek-Pathway-DRAFT-Suplimental-Intial-StudyProposed-Mitigated-Neg-Dec>. Accessed June 2022.

¹³ Sonoma County Transportation Authority. 2021. Foss Creek Pathway. Available at: https://scta.ca.gov/wp-content/uploads/2021/02/Jan2021CAC_FossCreekTrail.pdf. Accessed June 2022.



Figure 3: Project Site Existing Conditions: Site Photographs

1.4.1 Project Background

The project site previously contained agricultural uses but has most recently been vacant undeveloped land with no buildings or structures since 1974.¹⁴ The project site was acquired by the City of Healdsburg's former Redevelopment Agency in 2003 for the development of low- to moderate-income housing. In January 2021, the City solicited Requests for Qualifications from qualified affordable housing developers to design and develop an affordable housing project on the project site.

1.5 PROJECT DESCRIPTION

1.5.1 Proposed Building Characteristics

As shown in **Figure 4: Proposed Project Site Plan: Illustrative** and **Figure 5: Proposed Project Site Plan**, the project would construct a 58-unit affordable family rental housing project on the 3.53-acre City-owned property located at 155 Dry Creek Road, Healdsburg, California and the 0.17-acre off-site improvement area along Dry Creek Road, i.e., landscaping, sidewalk, curb, gutter, and travel lane. The project would consist of two, four-story apartment buildings with elevators (Building 1 and Building 2) totaling approximately 61,470 gross square feet (see **Table 1: Summary of Proposed Uses and Project Characteristics**). A pedestrian bridge would connect Buildings 1 and 2 on floors 2 through 4, providing elevator access and connectivity for the residences. Both buildings would have a roof ridge and parapet at a maximum height of 47 feet (and a maximum height of 56 feet for the penthouse stairwells). Because the project site's MU designation allows for a maximum of 57 units and a maximum height of 40 feet, the project requests a State Density Bonus to allow for one additional unit, for a total of 58 units, and a waiver under the State Density Bonus Law for additional height to accommodate the maximum height of 56 feet at the penthouse stairwells. The project's on-site and off-site improvements would also require Major Design Review subject to Planning Commission approval.

Building 1, the southern building along Dry Creek Road, and Building 2, the northern building along the private driveway and parking area, would form an L-shape oriented towards Foss Creek to the west. As shown in **Figure 6: Proposed Project Ground Floor Plans**, Building 1 would contain a total of 23 residential units: 17 one-bedroom units, three two-bedroom units, and three three-bedroom units. One unit would be reserved for the on-site building manager. Building 2 would contain a total of 35 residential units: 11 one-bedroom units, 12 two-bedroom units, and 12 three-bedroom units. The units in both buildings would range in size from approximately 499 to 946 square feet. The ground floor of Building 1 would have a reception area and elevator lobby, a mail and package area for residents, two residential units, and approximately 3,105 square feet of indoor amenities. These amenities would include two multipurpose activity community rooms and a kitchen, a laundry room, and a bike room. Building 1 would also have property management and maintenance offices, and space for resident services and Reach for Home (RFH) staff, who would provide on-site services aimed at helping households retain housing, improve their health outcomes, and maximize their ability to live and work in the City. The ground floor of Building 2 would have a separate lobby area, eight residential units, and the buildings' trash, electrical, and mechanical rooms.

All of the units (excluding the one manager's unit) would be available to extremely low-, very-low-, and low-income households earning between 30 percent and 60 percent of area median income for Sonoma County. To further meet the City's housing needs, RFH would have first priority to approximately five of these units, to help address the City's extremely low-income supportive housing needs.

¹⁴ Harris and Lee Environmental Sciences, LLC. 2021. *Phase 1 Environmental Site Assessment*. (See **Appendix F**.)

Table 1: Summary of Proposed Uses and Project Characteristics

Building 1 and Building 2 Total Area	New Construction (gross square feet)
Residential	43,937
Common Space	2,273
Office	832
Circulation and Lobby	12,689
Service	1,739
Total	61,470
<i>Project Characteristics</i>	
Height	47 feet*
Number of Stories	4 stories
Number of Residential Units	58
One-bedroom units (average 499 square feet)	28
Two-bedroom units (average 759 square feet)	15
Three-bedroom units (average 946 square feet)	15
Number of Off-Street Vehicle Parking Spaces†	104
Residents	88
Guest/Visitors	16
Number of Bicycle Parking Spaces	60
Class 1	50
Class 2	10
Square Footage of Outdoor Open Space	10,225

* Buildings 1 and 2 would have a maximum height of 56 feet for the mechanical equipment penthouse and stairwells, respectively.

† This number includes five Americans with Disabilities (ADA)-accessible spaces and 15 electric vehicle-ready spaces, including one van-accessible space.



Figure 4: Proposed Project Site Plan: Illustrative

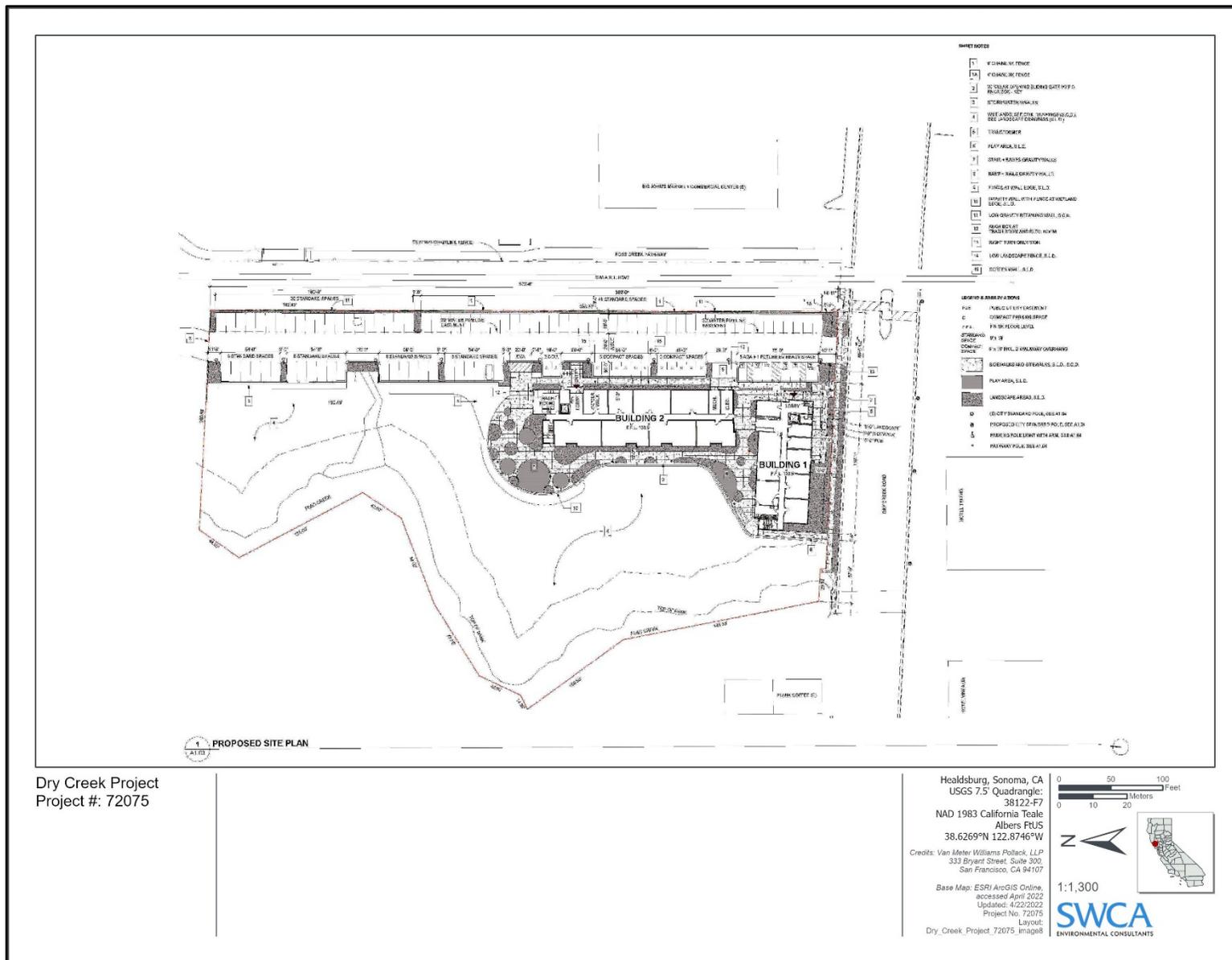


Figure 5: Proposed Project Site Plan

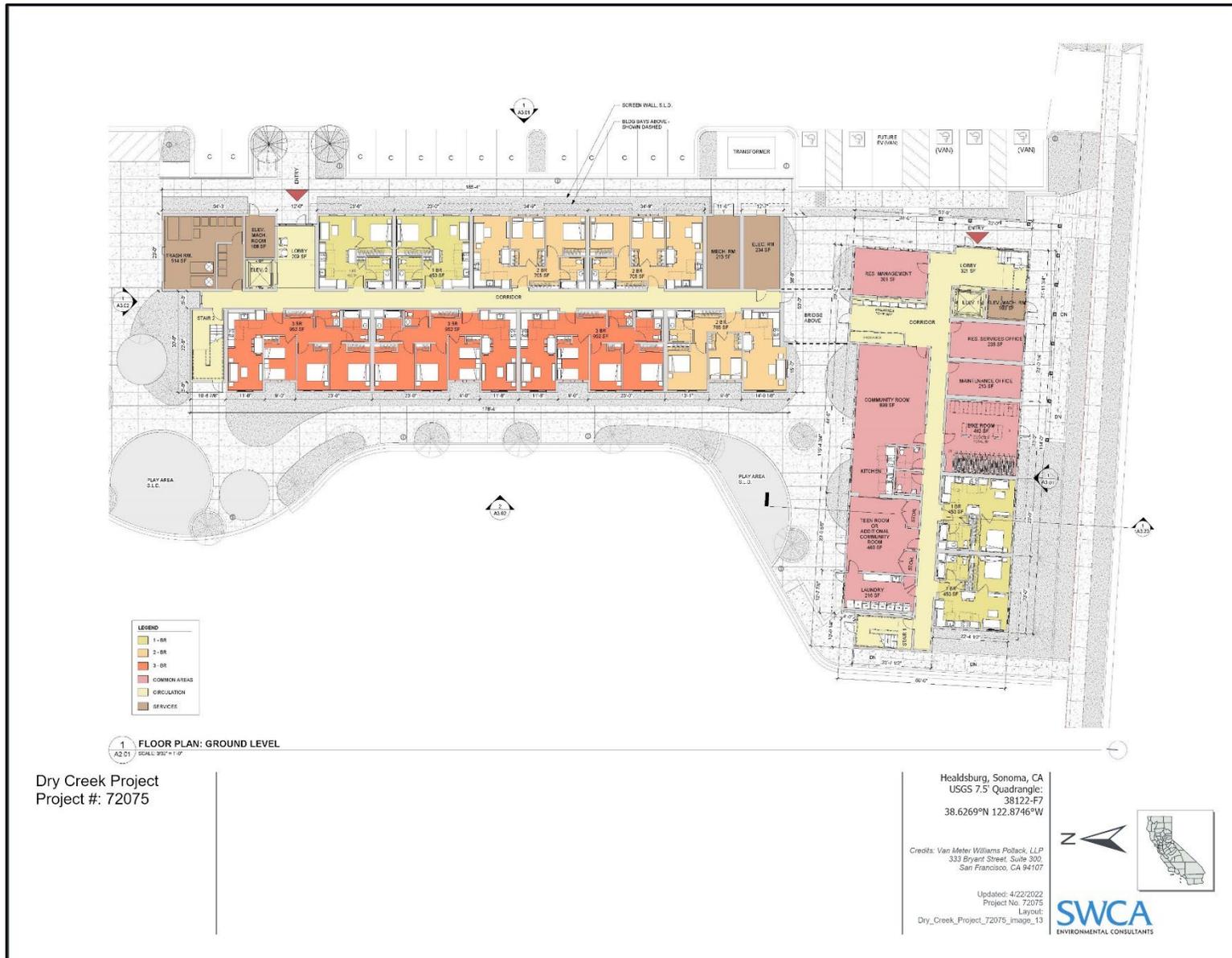


Figure 6: Proposed Project Ground Floor Plan

1.5.2 Site Access, Parking, and Vehicle Circulation

Primary vehicle and emergency access to the project site would be provided by a 26-foot-wide private driveway off Dry Creek Road. The driveway would run the entire length of the eastern side of the project site and connect to the adjacent property to the north through a gate. An emergency vehicle turnaround would be provided directly north of Building 2. The driveway would align with the driveway for Hotel Trio, located across from the project site on the south side of Dry Creek Road.¹⁵ The project would also construct a second westbound through lane on Dry Creek Road. Due to the proximity of the pedestrian refuge island for the signalized Foss Creek Pathway crossing at Dry Creek Road, limited space would be available in the two-way center left-turn lane on Dry Creek Road; therefore, left turns from the project driveway onto Dry Creek Road would be prohibited to limit the potential for traffic conflicts with pedestrians and cyclists.

The project would meet and exceed the parking requirement of the State Density Bonus Law and would provide on-site parking in a private parking lot that would have 104 off-street parking spaces, five of which would be Americans with Disabilities Act (ADA) accessible and 15 would be electric vehicle-ready spaces. The project is requesting a waiver under the State Density Bonus Law to the City's covered-parking standard due to the existence of the 20-foot-wide Geysers wastewater pipeline easement that runs the entire length of the eastern property line and limits the ability to provide covered parking on-site. Building 1 would include a secure indoor bicycle room with 50 bicycle spaces. Ten additional bicycle parking spaces would be provided at the entries to the buildings.

In addition to the widening of Dry Creek Road to accommodate a second westbound through lane, the project would implement frontage improvements along Dry Creek Road. The project would build a new landscaped, pedestrian-friendly streetscape with lighting for the sidewalks and a low stone wall. These improvements would fill an existing gap in the public sidewalk circulation system between Plank Coffee and Big John's Market and provide the public with views of the Foss Creek riparian corridor and the retained and newly constructed wetlands. Two pedestrian access points for residents would be provided from Dry Creek Road. Left turns from the project driveway would be prohibited, preventing conflicts between pedestrians on the Foss Creek Pathway crossing Dry Creek Road and drivers exiting the project site.

1.5.3 Landscaping and Lighting

The project would include 76,100 total square feet of landscaping, outdoor activity areas, walkways, and Dry Creek Road widening and street frontage improvements. On-site improvements would overlap with the existing 0.04-acre and 0.53-acre wetlands on the project site east of the 35-foot-wide Foss Creek riparian setback in the northeast and south-central portions of the project site, as shown in **Figure 4** and **Figure 7: Proposed Landscaping Plan**. Site development would include the removal of 0.25 acre of existing wetlands, construction of 0.41 acre of new functional wetlands on the western and northern portions of the project site outside of the 35-foot-wide Foss Creek riparian setback, and maintenance of the project site's existing drainage patterns. Wetlands would be replaced at a level slightly greater than a 1.64:1 ratio for a total of 0.73 acre of wetlands. No lighting would be installed on or directed toward the wetlands portion of the project site.

The existing and reconstructed wetland habitat and the Foss Creek riparian corridor would be viewed from the project's approximately 10,225 square feet of landscaped outdoor activity areas adjacent to both Building 1 and Building 2, and the new Dry Creek Road sidewalk, as shown in **Figure 7**. The outdoor areas would provide gathering and seating spaces as well as play areas for children. The outdoor areas

¹⁵ W-Trans. 2022. *Final Traffic Impact Study for the Dry Creek Commons Project*. April 8. (See **Appendix I**.)

would be supported by the indoor community amenities space as well as the project's proximity to the Foss Creek Pathway (located immediately east of the project site) and the Healdsburg Community Center and Carson Warner Memorial Skatepark (located south of the project site along Grove Street). Pursuant to the State Density Bonus Law, the project would seek a waiver from the open space requirements subject to Planning Commission approval because the project site's proposed open space would be less than required—approximately 11,600 square feet—under Municipal Code Section 20.08.175B(1).

As part of the proposed landscaping, a total of 43 new trees would be planted on the project site, including eight trees within the new and existing wetlands and 11 trees on the western side of the parking lot. Due to the existence of the 20-foot-wide Geysers wastewater pipeline easement that restricts tree planting in the Geysers right-of-way, the project is requesting a waiver under the State Density Bonus Law to the City's tree planting requirements in Municipal Code Section 20.16.100(D) for the parking area along the eastern project boundary. The project is also proposing a modified landscape configuration for the Dry Creek frontage and requesting a waiver for street tree planting due to the Geysers wastewater pipeline easement. Four new trees would be planted on the project site along the south elevation of Building 1 facing Dry Creek Road.

The project would widen Dry Creek Road to add a westbound lane and curb and gutter along the length of the project site. Lighting would be installed along the Dry Creek Road sidewalk, on and adjacent to proposed Buildings 1 and 2, along on-site pedestrian pathways, and in the parking lot on the east side of the project site. Due to the existence of the 20-foot-wide Geysers wastewater pipeline easement, which does not allow lighting within its easement, nine light poles ranging from 16 to 20 feet high would be located on the western side of the parking lot within the parking islands (see Municipal Code Section 20.16.165 (E.2)). Therefore, the project is requesting a waiver under the State Density Bonus Law for the modified lighting locations and maximum height of a light pole in the parking lot. In addition, three modified streetlights would be provided along Dry Creek Road in accordance with the City of Santa Rosa's approval due to the existence of the 20-foot-wide Geysers wastewater pipeline easement.

1.5.4 Utilities

Approximately 1,000 linear feet of pipelines for new wastewater, water, fire water, and stormwater drainage would be added throughout the project site, as shown in **Figure 8: Proposed Drainage and Utility Plan**. The fire water lines would be routed from Dry Creek Road and connect to three proposed hydrants situated throughout the project site. Stormwater drainage would be directed to catch basins to the east of Building 2 and south of Building 1 and connect to the 36-inch-diameter stormwater pipe in Dry Creek Road. The existing overhead electrical lines along the Dry Creek Road frontage would be relocated underground. The project would include all-electric buildings with rooftop solar panels to generate electricity on-site.

1.5.5 Construction

The project's construction activities are expected to occur over a period of approximately 12 to 18 months. Construction vehicle access to the project site would be provided along Dry Creek Road at the location of the proposed driveway. Construction activities for the proposed project would include grading of the project site and the filling of portions of the project site to elevate buildings out of the floodplain and provide additional coverage over the Geysers wastewater pipeline. These activities would be followed by site preparation, building construction and utility trenching, paving, and architectural coating. The project would result in temporary disturbance of approximately 2.37 acres on-site and would permanently develop approximately 1.75 acres. Project construction would require approximately 2,500 cubic yards of soil to be cut and used on-site as fill. An additional 2,800 cubic yards of soil import would also be used as fill. The estimated maximum depth of excavation is anticipated to be 3 to 4 feet below ground surface. The project would also create new wetlands and when creating the new wetlands, the upland areas between the riparian setback and the proposed new construction would be graded to meet the grade of the existing wetlands. The new impervious surface area would total 67,078 square feet and new pervious surfaces would total 36,241 square feet.

Existing site materials would be recycled or reused following demolition, when feasible; various recycled materials would be used in construction; and durable, long-lasting exterior finish materials would be incorporated throughout the project. Project construction would include use of standard construction equipment, including excavators, graders, tractors, loaders, and pavers.

1.6 REQUIRED DISCRETIONARY APPROVALS

The City of Healdsburg is the lead agency with responsibility for approving the project, including certification of the Initial Study/Mitigated Negative Declaration. The project would require the following approvals from the City:

- Major Design Review
- Residential Density Bonus (State Density Bonus Law)
- Covered Parking Waiver (State Density Bonus Law and Municipal Code Section 20.16.150.B.1)
- Height Waiver (State Density Bonus Law)
- Open Space Waiver (State Density Bonus Law and Municipal Code Section 20.08.175.B.1).
- Parking Lot Tree Planting Waiver (State Density Bonus Law)
- Street Tree Planting Waiver (State Density Bonus Law)
- Parking Lot Light Waiver (State Density Bonus Law)

The project would also obtain a Clean Water Act Section 404 Nationwide Permit from the U.S. Army Corps of Engineers (USACE) along with a Section 401 Water Quality Certification from the Regional Water Quality Control Board (RWQCB) in addition to project approval pursuant to the National Environmental Policy Act (NEPA).

CHAPTER 2. ENVIRONMENTAL CHECKLIST AND RESPONSES

2.1 AESTHETICS

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Except as provided in Public Resources Code Section 21099, would the project:</i>				
(a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2.1.1 Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

The primary scenic resources within the City are views of wooded ridges, hillsides, the Russian River, and adjacent agricultural valleys. As shown on 2030 General Plan Figure IV.B-1 (Major Scenic Ridgelines), the scenic vistas are concentrated along the northeastern and eastern parts of the City’s Planning Area; these include the ridgelines of Fitch Mountain and Healdsburg Ridge.¹⁶ The project site is not within 200 feet of a designated Scenic Ridgeline; therefore, no visibility analysis is required pursuant to Natural Resources Policy NR-10 of the 2030 General Plan.¹⁷

The two proposed buildings on the project site would be approximately 47 feet in height and would be similar in scale, size, and building height to the surrounding uses, including Hotel Trio located across Dry Creek Road on the south side of the street. Given the project site’s location on an urbanized commercial corridor away from any designated scenic resources and building height and massing in relation to surrounding land uses, the project would not obstruct views of ridgelines, wooded ridges, hillsides, the Russian River, and adjacent agricultural valleys. Therefore, the project would not have a substantial adverse effect on a scenic vista, and impacts would be less than significant.

¹⁶ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Aesthetics*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/682/Aesthetics-without-Graphics-PDF>. Accessed June 2022.

¹⁷ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Policy Document*, p. 7-9. Available at: <https://healdsburg.gov/DocumentCenter/View/634/General-Plan-Policy-Documents-PDF>. Accessed June 2022.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within a scenic highway?

The project site is located approximately 800 feet east of U.S. 101. According to the California State Scenic Highway System Map produced by the California Department of Transportation (Caltrans), the project site is not located near an eligible or designated scenic highway.¹⁸ Caltrans has not designated any roadway within the City as a scenic highway. State Route 128 (SR 128), located approximately 4 miles to the northeast, is an eligible scenic highway; however, the project site is not visible from SR 128.

As shown on 2030 General Plan Figure IV.B-3 (Scenic Highways, Roads and Streets), the City has designated several local roadways as scenic. In addition to U.S. 101, scenic roads or streets are located to the north (Healdsburg Avenue, north of Grove Street), east (North Fitch Mountain Road, east of Benjamin Way, and South Fitch Mountain Road, east of Heron Drive), and south (Healdsburg Avenue, south of the Russian River Bridge) of the project site. The 2030 General Plan requires the protection and enhancement of the viewsheds along U.S. 101, which offers views across both nearby vineyards and hillsides, particularly north of Dry Creek Road where the freeway grade is higher than in most of the City. As a scenic corridor, U.S. 101, which borders most of the City lying to the east, is enhanced by mature redwood plantings which partially screen neighboring urban development, including various industrial, residential, and commercial uses.¹⁹ The project site is located approximately 800 feet east of U.S. 101, 0.5 mile south of the portion of Healdsburg Avenue and Grove Street designated as a scenic road/street, and over 1 mile from other designated scenic roads and streets.

Given the distance and intervening buildings and landscaping, the project site is not visible from U.S. 101 or other designated scenic roads and streets in the City. Furthermore, the project's proposed design, including setbacks, building heights, massing, orientation, color, building materials, and landscaping, would be consistent with the 2030 General Plan. Thus, due to the project's limited development footprint; the absence of any heritage trees, rock outcroppings, or historic buildings on the project site; and distance from U.S. 101 or other designated scenic roads and streets, the project would not substantially damage scenic resources in view of or within a scenic highway, including U.S. 101. Impacts would be less than significant.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The project site is located in a built-up urban area and is bordered by commercial, industrial, and residential land uses. The western boundary of the project site is formed by the Foss Creek riparian corridor. The project design seeks to balance the more urban character of Dry Creek Road, the immediate commercial and industrial surroundings, and the residential nature of the greater community.

The project would construct two, four story apartment buildings of approximately 61,470 gross square feet connected by an aboveground pedestrian bridge. The L-shape orientation of the two buildings would minimize the potential impacts to the Foss Creek riparian corridor, maintain views of Foss Creek from

¹⁸ California Department of Transportation. 2018. California State Scenic Highway System Map. Available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed June 2022.

¹⁹ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Aesthetics*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/682/Aesthetics-without-Graphics-PDF>. Accessed June 2022.

Dry Creek Road and the public sidewalk, and set the buildings as far west as possible from the SMART railroad tracks. The pedestrian bridge would allow a visual connection to the Foss Creek Pathway and the Foss Creek riparian corridor and would break up the massing of the buildings. A covered walkway would wrap around Building 1 at ground level, creating a connection to the Dry Creek Road frontage, reducing the perceived scale of the building, and highlighting the building entry.

Article IV, Design and Architectural Review, of Municipal Code Chapter 20.28 outlines the City's design review process, which seeks to preserve the community's natural beauty, improve its appearance, and ensure compatibility of projects. Design review is required for all commercial, office, and industrial projects, and projects involving more than two residential units. The project would undergo Major Design Review to ensure all applicable policies and requirements of the General Plan, Zoning Ordinance, and Citywide Design Guidelines are met prior to design application approval. Therefore, the project would not conflict with applicable zoning or other regulations governing scenic quality such that the visual character of the project site or its surroundings would be substantially degraded. Impacts would be less than significant.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The proposed project would develop two new buildings with 58 residential units and a parking lot. The project site does not currently generate daytime or nighttime lighting. Therefore, new sources of light and glare caused by the development could be intrusive. The new sources of light would include interior and exterior lighting for decorative and security purposes.

The project would provide pedestrian, building and entry, and parking area lighting in conformance with the requirements of Municipal Code Section 20.16.165 (E), Lighting of Parking Areas, and Section 20.24.015, Glare. The project would partially conform with the design standards regulating the lighting of vehicular parking areas and the City's streetlight requirements. Section 20.16.165 requires the inclusion of lighting facilities capable of providing sufficient illumination at every point of the parking area, a 14-foot maximum height of light fixtures, and downward angle of all illumination. Section 20.24.015 requires the placement of streetlights so that indirect or diffuse lighting is directed away and/or shielded to minimize spillage onto adjacent properties. Due to the existence of the Geysers wastewater pipeline easement, exterior lighting is prohibited on the eastern side of the parking lot; however, nine exterior lights would be installed on the western side of the parking lot at the end of the parking islands. Additional light pole height would be required in order to adequately illuminate these areas. The project would seek a Parking Lot Light Waiver in accordance with State Density Bonus Law in order to allow for the modified light location and pole height along the western side of the parking lot. The project's Dry Creek Road frontage improvements would include installation of three modified streetlights on the Geysers wastewater pipeline easement in accordance with the City of Santa Rosa's approval to allow modified streetlights.

As part of the project's Major Design Review and prior to issuance of grading permits for the project, the developer would provide a lighting plan for the project site and the streetscape along Dry Creek Road for the City to review and approve. The lighting plan would include provisions to ensure that outdoor lighting would be designed so that potential glare or light spillover to surrounding roadways and land uses would be minimized through appropriate site design and shielding of light fixtures. The City would review the plan to ensure that all lighting is directed downward and away from residences. Therefore, exterior lighting would be installed to minimize lighting spillover on adjacent properties and to ensure that the parking lot, public sidewalk, and street would be adequately lit for public safety. The addition of two new residential buildings and a parking area on a portion of the 3.7-acre site would not adversely affect daytime views in the project area, which is zoned MU, through the addition of light or glare. Nighttime views may be affected if the buildings and parking lot include exterior lights that are not screened. With

the modifications described above for streetlight locations and pole heights in the parking lot on the eastern portion of the site, and for modified streetlights along the Dry Creek Road frontage the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area; therefore, impacts related to light and glare would be less than significant.

2.1.2 Mitigation Measures

None required.

2.2 AGRICULTURE AND FORESTRY RESOURCES

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

2.2.1 Impact Analysis

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

The California Department of Conservation (CDOC) Division of Land Resource Protection lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of “Important Farmland” in California. The project site is designated as “Urban and Built-Up Land” and contains no land that the CDOC designates as Prime Farmland, Unique Farmland, or Farmland of

Statewide Importance.²⁰ Therefore, the project would have no impact on the conversion of farmland to non-agricultural uses.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The Williamson Act of 1965 allows local governments to enter into agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use. Within the City, only one parcel of land, located approximately 1.5 miles south of the project site, is zoned Agriculture (AG) and it is not subject to a Williamson Act contract.²¹ Given the project's location 1.5 miles north of the AG zoned parcel as well as the fact that the parcel is not subject to a Williamson Act contract, the project would not conflict with any agricultural use. Therefore, no impact with respect to land zoned for agricultural use or land under a Williamson Act contract would occur.

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

The project site is zoned MU, is surrounded by commercial and industrial land uses, and is not located on forest land, timberland, or timberland zoned Timberland Production. No impact related to conflicts with existing zoning for forest land, timberland, or timberland zoned Timberland Production would occur.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The project site is zoned MU, surrounded by commercial and industrial land uses, and is not located on forest land. Therefore, no impact related to the loss or conversion of forest land would occur.

e. Would the project 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?

As previously discussed, the project site is zoned MU and located in a developed area surrounded by commercial and industrial land uses. Neither the project site nor the surrounding parcels are used for agricultural uses or forest land for timber production. There is no agricultural production or forest land in the vicinity of the project site. Therefore, no impacts related to conversion of farmland to a non-agricultural use or conversion of forest land to non-forest use would occur.

2.2.2 Mitigation Measures

None required.

²⁰ California Department of Conservation (CDOC). 2012. DOC Maps: Agriculture. Available at: <https://maps.conservation.ca.gov/agriculture/>. Accessed June 2022.

²¹ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Agricultural Resources*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/683/Agricultural-Resources-PDF>. Accessed June 2022.

2.3 AIR QUALITY

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</i>				
(a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2.3.1 Environmental Evaluation

An *Air Quality and Greenhouse Gas Impact Assessment* was prepared for the project by Stantec Consulting Services, Inc. The following analysis incorporates the findings of this report, which has been included as **Appendix B** to this Initial Study.

2.3.2 Environmental Setting

The project site is located in northern Sonoma County within the North Coast Air Basin. The air basin is primarily rural and mountainous and includes the northern portion of Sonoma County and the entirety of Mendocino, Trinity, Humboldt, and Del Norte counties. This portion of the air basin is under the jurisdiction of Northern Sonoma County Air Pollution Control District (NSCAPCD). NSCAPCD covers the northern and coastal regions of Sonoma County, including Annapolis, Bodega, Bodega Bay, Camp Meeker, Cazadero, Cloverdale, Duncan Mills, Forestville, Geyserville, Gualala, Guerneville, Healdsburg, Jenner, Monte Rio, Rio Nido, and The Sea Ranch.

2.3.2.1 CRITERIA AIR POLLUTANTS

The federal Clean Air Act (CAA) required the U.S. Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) for various pollutants. These pollutants are referred to as “criteria” pollutants because the EPA publishes criteria documents to justify the choice of standards. These standards define the maximum amount of an air pollutant that can be present in ambient air.

An ambient air quality standard is generally specified as a concentration averaged over a specific time, such as 1 hour, 8 hours, 24 hours, or 1 year. The different averaging times and concentrations are meant to protect against different exposure effects. Standards established for the protection of human health are referred to as primary standards; standards established for the prevention of environmental and property damage are called secondary standards. The CAA allows states to adopt additional or more health-protective standards.

Concentrations of emissions from criteria air pollutants (the most prevalent air pollutants known to be harmful to human health) are used to indicate the quality of the ambient air. Criteria air pollutants include ozone, carbon monoxide (CO), nitrogen dioxide, sulfur dioxide, particulate matter (measured both in units

of smaller than 2.5 microns in diameter [PM_{2.5}] and in units of particulate matter smaller than 10 microns in diameter [PM₁₀]), and lead.

2.3.2.2 TOXIC AIR CONTAMINANTS

Toxic air contaminants (TACs) are air pollutants that may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air, but due to their high toxicity, they may pose a threat to public health even at very low concentrations. Because there is no threshold level below which adverse health impacts are not expected to occur, TACs differ from criteria pollutants for which acceptable levels of exposure can be determined and for which state and federal governments have set ambient air quality standards. TACs, therefore, are not considered “criteria pollutants” under the CAA or the California Clean Air Act, and they are not subject to National or California Ambient Air Quality Standards (NAAQS and CAAQS, respectively). Instead, the EPA and California Air Resources Board (CARB) regulate Hazardous Air Pollutants (HAPs) and TACs, respectively, through statutes and regulations that generally require the use of the maximum or best available control technology (BACT) to limit emissions. In conjunction with Air District rules, these federal and state statutes and regulations establish the regulatory framework for TACs. At the national level, the EPA has established National Emission Standards for Hazardous Air Pollutants (NESHAPs), in accordance with the requirements of the CAA and subsequent amendments. These are technology-based, source-specific regulations that limit allowable emissions of HAPs.

Within California, TACs are regulated primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588). The Tanner Act sets forth a formal procedure for CARB to designate substances as TACs. The following provides a summary of the primary TACs of concern within the state of California, and related health effects.

2.3.2.3 AIR QUALITY ATTAINMENT STATUS

The EPA and CARB designate air basins where ambient air quality standards are exceeded as “nonattainment” areas. If standards are met, the area is designated as an “attainment” area. If there are inadequate or inconclusive data to make a definitive attainment designation, the area is considered “unclassified.” National nonattainment areas are further designated as marginal, moderate, serious, severe, or extreme as a function of deviation from standards.

Each standard has a different definition, or “form” of what constitutes attainment, based on specific air quality statistics. For example, the federal 8-hour CO standard is not to be exceeded more than once per year; therefore, an area is in attainment of the CO standard if no more than one 8-hour ambient air monitoring value exceeds the threshold per year. In contrast, the federal annual standard for PM_{2.5} is met if the 3-year average of the annual average PM_{2.5} concentration is less than or equal to the standard.

Air quality in northern Sonoma County is in attainment for all pollutants and falls below the standards set in the NAAQS and the CAAQS.

2.3.2.4 LOCAL SOURCES OF AIR POLLUTION

The project site is in a predominately urban setting with commercial and industrial uses immediately adjacent east, west, north and south of the project site. The main sources of air pollution are mobile sources traveling along the nearby roadways that surround the project site. Nearby sources of air pollution include emissions from vehicles on U.S. 101, Dry Creek Road, Grove Street, and Healdsburg Avenue.

Future air emissions sources include the SMART passenger rail service project that, once completed, will extend approximately 70 miles between Cloverdale in northern Sonoma County and Larkspur Landing in

Marin County. The southern portion of the SMART line from the Sonoma County Airport to Larkspur opened in August 2019. A new SMART rail station is planned for Healdsburg south of downtown; however, the construction schedule for the station is unknown. The project site lies adjacent to the SMART right-of-way that is planned for the future SMART passenger rail line. The SMART passenger rail runs with clean-diesel engines that meet EPA’s Tier 4 emissions standards. Tier 4 engines reduce PM and nitrogen oxide emissions by 96 percent and 93 percent, respectively, as compared to regular diesel engines.

2.3.2.5 SENSITIVE RECEPTORS

According to CARB, some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, childcare centers, playgrounds, retirement homes, convalescent homes, hospitals, and medical clinics.

The project site is located within 1,000 feet of existing sensitive receptors that could be exposed to diesel emission exhaust during project construction. The nearest sensitive receptors are residents located on the same site as Plank Coffee along Grove Street, approximately 63 feet west of the project site and the Foss Creek corridor; the residents at the Citrine Apartments at 1260 Grove Street, approximately 360 feet south of the project site south of Dry Creek Road; and single-family residences located approximately 800 feet east of the project site along March Avenue east of Healdsburg Avenue. As a residential project, the project is not considered a source of TACs during operations because it would not include large stationary sources that generate TACs nor would the vehicles accessing the project site include a substantial number of diesel-fueled vehicles, which are sources of TACs.

2.3.3 Impact Analysis

The NSCAPCD has not adopted standards of significance for project emissions from individual development projects to use as guidance and recommends that projects use thresholds and guidance recommendations from the Bay Area Air Quality Management District (BAAQMD). The thresholds of significance are shown below in **Table 2: BAAQMD Significance Thresholds**.²²

Table 2: BAAQMD Significance Thresholds

Pollutant	Construction-Related Thresholds (lbs/day)	Operational-Related	
		Average Daily Emissions (lbs/day)	Maximum Annual Emissions (tpy)
Reactive organic gases	54	54	10
Oxides of nitrogen	54	54	10
Particulate matter 10 microns or smaller	82 (exhaust)	82	15
Particulate matter 2.5 microns or smaller	54 (exhaust)	54	10

Source: BAAQMD, 2017; *Air Quality and Greenhouse Gas Impact Assessment* (see **Appendix B**)

Notes: lbs/day = pounds per day; tpy = tons per year

²² Bay Area Air Quality Management District (BAAQMD). May 2017. *CEQA Air Quality Guidelines*. Available at: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed June 2022.

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The State CEQA Guidelines indicate that a significant impact would occur if the project would conflict with or obstruct implementation of the applicable air quality plan. Air districts are required to prepare air quality plans to identify strategies to bring regional emissions into compliance with federal and state air quality standards. Northern Sonoma County and the North Coast Air Basin are in federal and state attainment for all air pollutants. As a result, the NSCAPCD does not have an air quality plan, therefore, the project would not obstruct implementation of an applicable air quality plan.

A measure of determining if a project is consistent with air quality plans in other air districts is if the proposed project would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations. Projects would conflict with an air quality plan if they contribute to an exceedance of any emissions for which the region is in nonattainment. Air districts establish emissions thresholds for individual projects to demonstrate the point at which a project would be considered to increase the air quality violations. Projects that exceed thresholds would be considered to conflict with an air quality plan. As described under Impact Question (b), below, the proposed project would fall below the thresholds established by the BAAQMD shown in **Table 2**. Since the proposed project does not exceed BAAQMD thresholds, it is anticipated that it would not conflict with or obstruct an air quality plan, if one were applicable. As a result, the impact would be less than significant.

b. Would the project 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?

In developing thresholds of significance for criteria air pollutants, the BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds shown in **Table 2**, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

In addition to project-specific thresholds, the BAAQMD identified screening criteria to provide lead agencies and project applicants with a conservative indication of whether the proposed project could result in potentially significant air quality impacts. If all screening criteria are met by a proposed project, then the lead agency or applicant would not need to perform a detailed air quality assessment of the project's air pollutant emissions. The screening criteria are meant to represent greenfield development and do not account for project design features that would reduce air quality emissions.

The project would construct a 58-unit, four-story residential apartment complex on a vacant site. The BAAQMD criteria air pollutant screening criteria thresholds for mid-rise apartments are 240 dwelling units and 494 dwelling units for construction and operation, respectively. The project falls approximately 76 percent and 88 percent below the screening thresholds, respectively; therefore, a detailed construction and operational air quality analysis is not required.²³ The project would adhere to applicable NSCAPCD rules and regulations during project construction such as Rule 430 (Fugitive Dust Emissions) which would limit the amount of fugitive dust (PM₁₀ and PM_{2.5}) from site grading and other earth-moving activities and Rule 485 (Architectural Coatings) which would limit emissions from volatile organic compounds associated with building materials. Among the best management practices (BMPs) that would

²³ BAAQMD. May 2017. *CEQA Air Quality Guidelines*, pp. 3-1 to 3-33. Available at: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed June 2022.

be required to be implemented under Rule 430 to minimize construction-related emissions would be the following:

- Covering open bodied trucks when used for transporting materials likely to give rise to airborne dust.
- Installing and using hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Containment methods can be employed during sandblasting and other similar operations.
- Use water or chemicals to control dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
- Apply asphalt, oil, water or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which can give rise to airborne dusts.
- Pave roadways and maintain them in a clean condition.
- Promptly remove earth or other material from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or other means.

The project's final construction drawings would include the listed items with the submittal of the Project building permit. As a result, impacts would be considered less than significant and would not be cumulatively considerable.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Construction Emissions

Fugitive Dust (PM₁₀)

Fugitive dust (PM₁₀) would be generated from site grading and other earth-moving activities. Most of this fugitive dust would remain localized and would be deposited near the project site. However, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce the emissions from the project site. The project would comply with NSCAPCD Rule 430 Fugitive Dust to reduce particulate emissions during construction.

Naturally Occurring Asbestos

Construction in areas of rock formations that contain naturally occurring asbestos (NOA) could release asbestos into the air and pose a health hazard. BAAQMD enforces CARB's air toxic control measures at sites that contain ultramafic rock. The air toxic control measures for construction, grading, quarrying, and surface mining operations were signed into state law on July 22, 2002 and became effective in the Air Basin in November 2002.²⁴ The purpose of this regulation is to reduce public exposure to NOA. A review of the map with areas more likely to have rock formations containing NOA in California indicates that there is no NOA in the immediate project area.²⁵ Additionally, the 2030 General Plan Update EIR indicates that areas of NOA are located in Sub-Areas B and C of the Planning Area north and east of the

²⁴ CARB. 2015. Asbestos Airborne Toxics Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations. California Code of Regulations (CCR), Title 17, Section 93105. Available at <https://www.arb.ca.gov/toxics/atcm/asp2atcm.htm>. Accessed June 2022.

²⁵ Van Gosen, B.S., and Clinkenbeard, J.P., 2011. Reported historic asbestos mines, historic asbestos prospects, and other natural occurrences of asbestos in California: U.S. Geological Survey Open-File Report 2011-1188, 22 p., 1 pl. Available at: <https://pubs.usgs.gov/of/2011/1188/>. Accessed May 2022.

project site.²⁶ Therefore, it can be reasonably concluded that the project would not expose sensitive receptors to NOA. Therefore, impacts would be less than significant.

Diesel Particulate Matter

Exposure to diesel particulate matter (DPM) from diesel vehicles and off-road construction equipment can result in health risks to nearby sensitive receptors. The project site is surrounded by commercial and industrial land uses with the nearest residences located on Grove Street adjacent to and west of the project site across Foss Creek. Construction-period DPM could contribute to increased health risks to nearby residents. Residents located adjacent to the project site and within the vicinity would be exposed only for the duration of construction. These residences would be approximately 110 feet west of the proposed work areas on the project site east of the 35-foot-wide Foss Creek riparian corridor. The majority of the construction work would occur on the eastern portion of the project site in an area located over 200 feet away from the nearest residences. Other residences are located approximately 360 feet south of the project site along Grove Street across Dry Creek Road. While construction of the project would involve the use of diesel-fueled vehicles and off-road equipment, exposure would be minor and temporary as the project size falls below the BAAQMD construction screening thresholds. Additionally, the prevailing wind direction in the City is from the west and the sensitive receptors would be located upwind of the project site construction work areas. Furthermore, DPM emissions have also been shown to be reduced by approximately 45 percent at a distance of approximately 100 feet from a source and approximately 60 percent at a distance of approximately 300 feet from a source.²⁷ Additionally, to reduce emissions from this equipment BMPs recommended by the BAAQMD would be implemented such as shutting equipment off when not in use, reducing idling time for internal combustion engines to less than 5 minutes²⁸, and proper equipment maintenance and tuning of diesel equipment in accordance with manufacturer's specifications. The project contractor would also post a publicly visible sign with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The NSCAPCD's phone number will also be visible to ensure compliance with applicable regulations. Therefore, with consideration to applicable BMPs, the prevailing wind direction, intervening distance between construction work areas and sensitive receptors, and the limited emissions expected based on the BAAQMD screening threshold for the project type and size, construction of the project would not result in a health risk exposure from DPM.

Operations

The greatest potential for exposure to TACs during long-term operations is from the use of heavy-duty diesel trucks and stationary generators that use diesel fuel. The proposed project is a 58-unit residential development. Once operational, the majority of vehicle trips to the project site would be from residents and, as a result, the project would attract very few heavy-duty diesel truck trips. Additionally, the project would not include any on-site stationary generators. For these reasons, once operational, the project would not be expected to expose nearby sensitive receptors to substantial amounts of TACs.

²⁶ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Air Quality and Figure III-3 Development Subareas*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/677/Air-Quality-PDF> and <https://www.ci.healdsburg.ca.us/DocumentCenter/View/692/Figure-III---3-PDF>. Accessed May 2022.

²⁷ California Air Resources Board (CARB). 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*, pp. 9-10. Available at: <https://www.arb.ca.gov/ch/handbook.pdf>. Accessed June 2022.

²⁸ CARB, 2013. California Airborne Toxics Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, Title 13, Section 2485 of California Code of Regulations (CCR). Available at: https://ww2.arb.ca.gov/sites/default/files/classic/msprog/truck-idling/13ccr2485_09022016.pdf. Accessed June 2022.

Once operational, the project would be considered a sensitive receptor, and future residents could be exposed to TAC emissions from nearby mobile and stationary sources. The CARB *Air Quality and Land Use Handbook* contains recommendations that will “help keep California’s children and other vulnerable populations out of harm’s way with respect to nearby sources of air pollution.”²⁹ Consistency with these recommendations is assessed as follows:

1. **Heavily traveled roads.** CARB recommends avoiding new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. Epidemiological studies indicate that the distance from the roadway and truck traffic densities were key factors in the correlation of health effects, particularly in children.

The project site lies approximately 800 feet east of U.S. 101. According to Caltrans, this segment of U.S. 101 at the Dry Creek Road interchange has an annual average daily trip count of 45,200 vehicles per day. Therefore, the project site is not located within 500 feet of a highway, and the nearest highway’s average daily trip rate is less than 100,000 vehicles per day. Additionally, there are no urban or rural roadways where vehicle traffic exceeds 100,000 vehicles per day or 50,000 vehicles per day, respectively, near the project site.

2. **Distribution centers.** CARB also recommends avoiding siting new sensitive land uses within 1,000 feet of a distribution center.

The project site is not located within 1,000 feet of a distribution center.

3. **Fueling stations.** CARB recommends avoiding new sensitive land uses within 300 feet of a large fueling station, which is a facility with a throughput of 3.6 million gallons per year or greater (e.g., Costco fuel station). CARB recommends a 50-foot separation for typical gas-dispensing facilities.

There are three gas stations located near the project site. A Valero Gas Station is located approximately 200 feet southwest of the project boundary at Grove Street and Dry Creek Road, and a Chevron station is located approximately 800 feet northwest of the project boundary at Healdsburg Avenue and Sunnyvale Drive. The Healdsburg Gas Mart lies approximately 550 feet east of the project site at Dry Creek Road and Healdsburg Avenue. None of the nearby fueling stations have a throughput of 3.6 million gallons per year or greater; therefore, they would not be considered large fueling stations. In addition, the project site is over 50 feet from any gas station. Therefore, the project is consistent with CARB recommendations.

4. **Dry cleaning operations.** CARB recommends avoiding siting new sensitive land uses within 300 feet of any dry-cleaning operation that uses perchloroethylene. For operations with two or more machines, CARB recommends a buffer of 500 feet. For operations with three or more machines, CARB recommends consultation with the local air district.

The nearest dry-cleaning operation is located approximately 775 feet east of the project site at 105 Terrace Boulevard. The project site is over 500 feet from a dry-cleaning operation; therefore, the project is consistent with CARB recommendations.

5. **Auto body shops.** Auto body shops have the potential to emit TACs related to painting. The CARB does not provide a recommended distance for locating sensitive receptors with respect to auto body shops, however, potential impacts are localized near the facility.

The project site lies within 350 feet of McConnell Chevrolet and 550 feet of McConnell Chrysler Dodge Jeep Dealers (both located northeast of the project site). Both dealerships mainly sell automobiles and perform some limited car services and repairs. The site is also approximately

²⁹ California Air Resources Board (CARB). 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*, pp. ES-1. Available at: <https://www.arb.ca.gov/ch/handbook.pdf>. Accessed June 2022.

560 feet away from the NAPA Auto Parts shop (located northwest of the project site). Painting is expected to be minimal from the dealership locations as most auto service repairs will be for tire changes and engine repairs and the NAPA Auto Parts shop only sells auto parts. Based on the distance to these facilities and minimal auto body painting activity, these facilities would not result in a measurable impact.

In addition, the project site would lie next to the future SMART passenger rail line. The SMART passenger rail runs with clean-diesel engines that meet EPA's Tier 4 emissions standards. Tier 4 engines reduce PM and nitrogen oxide emissions by 96 percent and 93 percent, respectively, as compared to regular diesel engines. Therefore, once in operation, the SMART passenger rail service would not be a significant source of TAC emissions.

The project is not among those uses considered potential sources of TAC emissions. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations and the impact would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Project Construction

Diesel exhaust and reactive organic gases/volatile organic compounds would be emitted during construction of the project from equipment exhaust, painting, and paving activities, which are objectionable to some people. However, construction activities would be minimal and short term, and emissions would disperse rapidly from the project site. Therefore, project construction would not create objectionable odors affecting a substantial number of people. As such, impacts from construction-related odor would be less than significant.

Project Operation

Land uses typically associated with odors include wastewater treatment facilities, waste-disposal facilities, and agricultural operations. The project proposes to construct a 58-unit affordable housing development and therefore does not contain land uses typically associated with the emissions of objectionable odors. The NSCAPCD has not established recommended distances from which residents or other sensitive receptors should be placed from odorous land uses, such as wastewater treatment plants, painting/coating operations, landfills, composting facilities, and petroleum refineries, among others. However, BAAQMD's 2017 Air Quality Guidelines provide recommended odor screening distances from such land uses of at least 1 mile.³⁰ Projects that would site an odor source or a receptor farther than the applicable screening distance would not likely result in a significant odor impact. The project site is not located within the 1- and 2-mile screening distances recommended by the BAAQMD to any potential odor sources and is not a source of odors itself, and as such, impacts would be less than significant.

2.3.4 Mitigation Measures

None required.

³⁰ BAAQMD. 2017. *CEQA Air Quality Guidelines*, p. 3-4. Available at: http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed May 2022.

2.4 BIOLOGICAL RESOURCES

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<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, 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"/>
(c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<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 native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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"/>

2.4.1 Environmental Evaluation

A *Biological Resources Assessment* was prepared for the project by Wildlife Research Associates and Jane Valerius Environmental Consulting and an *Arborist's Summary* was prepared by Becky Duckles, Consulting Arborist and Landscape Advisor. The following analysis incorporates the findings of these reports, which have been included as **Appendix C-1** and **Appendix C-2**, respectively, to this Initial Study.

2.4.2 Environmental Setting

The project site is located within the North Coast Province. Vegetation in the North Coast Province consists predominantly of conifer and mixed-conifer forests bisected by chaparral stands, riparian forests, and wetlands. Valley and foothill grassland and woodland communities emerge along the central and southeastern border of the province, while coastal wetlands and marshes appear along the coastline. Specifically, Douglas-fir, mixed-evergreen, western hardwoods, and chaparral-mountain shrub dominate the province.

The roughly rectangular, approximately 3.7-acre project site, including the 3.53-acre parcel and 0.17-acre off-site improvement area along Dry Creek Road, ranges in elevation between 135 feet amsl in the northeast and 125 feet amsl in the southwest and is situated west of the Russian River and east of Dry

Creek. All creeks in this area flow generally from north to south. Foss Creek originates approximately 1 mile north of Healdsburg and is fed by several drainages in the east. Norton Slough and Foss Creek merge approximately 4,820 feet to the south of the project site. Along the western boundary of the project site, Foss Creek supports a robust riparian vegetation community including within the 35-foot-wide riparian setback; however, no work would occur in the creek or riparian setback area.

2.4.3 Impact Analysis

a. *Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Based on the site visit conducted on May 13, 2021, three vegetation communities, comprising four wildlife habitat types, occur within the project site. The vegetation communities are non-native grasslands, mixed willow riparian woodland, and seasonal wetlands. The potential for the occurrence of 46 special-status plant species was evaluated. Floristic surveys were conducted for plants in the spring of 2021 to cover the flowering period for all special-status plants with the potential to occur based on the presence of suitable habitat. Of the 46 special-status plant species identified, only four had the potential to occur on the project site and none were identified during any of the protocol surveys conducted on the project site; therefore, no further plant surveys were conducted.

In total, 38 special-status animal species were evaluated for the potential to occur within a three-mile radius of the project site. Of these 38 special-status animal species, 27 are not expected to occur within the project site due to lack of habitat. Of the 11 species that have potential for occurrence on the project site, only nine species have potential to occur within the project impact area (areas within the project site that are proposed for permanent development). For the two species with no suitable habitat within the project impact area (i.e., fish), no further analysis was conducted.

The project would incorporate general avoidance and minimization measures and best management practices (BMPs) in the construction of the project to avoid and minimize potential effects of the project on special-status species. These measures include, but are not limited to, the following:

1. *Work Windows.* Ground disturbance will be conducted during the dry season, generally between April 15 and October 15, of any given year, depending on the level of rainfall and/or project site conditions.
2. *Proper Use of Erosion Control Materials.* Plastic or synthetic monofilament netting will not be used, in order to prevent wildlife from becoming entangled, trapped, or injured. This includes products that use photodegradable or biodegradable synthetic netting, which can take several months to decompose. Acceptable materials include natural fibers such as jute, coconut, twine, or other similar fibers. Following site restoration, any materials left behind as part of the restoration, such as straw wattles, should not impede movement of species.
3. *Avoidance of Entrainment.* If a water body (e.g., pond or ditch) is to be temporarily dewatered by pumping, intakes shall be completely screened with wire mesh smaller than 5 millimeters and intake placed within a perforated bucket or other method to attenuate suction to prevent amphibian larvae from entering the pump system. Pumped water shall be stored in a manner that does not degrade water quality and then upon completion released back into the water body, or at an appropriate location in a manner that does not cause erosion. No rewatering of the water body is necessary if sufficient surface or subsurface flow exists to fill it within a few days, or if work is completed during the time of year the water body would have dried naturally, or for predator control purposes.

4. *Trash*. All foods and food-related trash items will be enclosed in sealed trash containers at the end of each day and removed from the project site every 3 days.

However, even with incorporation of the general avoidance and minimization measures and BMPs, the project could result in impacts to western pond turtles, nesting passerines, nesting raptors, and roosting bats.

Western pond turtles may occur within the vicinity of the project site and may use Foss Creek and move through the upland habitat as a movement corridor. Development of grasslands within the project site may impact individual western pond turtles. The project would incorporate **Mitigation Measure BIO-1** to reduce potential impacts to western pond turtle to less than significant.

Passerines and raptors nesting in the individual and riparian trees and the lowlands within the project impact area could be impacted if construction occurs during the nesting season (between February 1 and August 30, annually). The project would incorporate **Mitigation Measure BIO-2** to reduce potential impacts to passerines and raptors to less than significant.

The proposed removal of eight trees may cause direct mortality of roosting bats if the trees provide suitable roosting habitat and are removed during seasonal periods of inactivity (maternity season or winter). The project would incorporate **Mitigation Measure BIO-3** to reduce potential impacts to roosting bats to less than significant.

Therefore, implementation of **Mitigation Measures BIO-1, BIO-2, and BIO-3** would reduce potential impacts to sensitive or special-status species to less-than-significant levels.

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

Please refer to analysis under Impact Question (c). Impacts would be less than significant with implementation of **Mitigation Measure BIO-4**.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

A formal wetland delineation was conducted in the spring of 2021 and was verified by the U.S. Army Corps of Engineers. The mixed willow riparian community along Foss Creek on the western boundary of the project site is a perennial stream and designated as a sensitive natural community by the California Department of Fish and Wildlife (CDFW). The width of Foss Creek at the ordinary high-water mark averages approximately 20 feet. A total of 0.14 acre of waters of the U.S. and waters of the state occurs within the project site. Foss Creek has a willow riparian canopy cover that includes oaks, walnut, elderberry, and Himalayan blackberry. However, no construction activities would occur in Foss Creek or within the 35-foot-wide riparian setback. The project would have no direct or indirect impacts to the 0.14 acre of waters of the U.S. or associated riparian habitat.

Two seasonal wetlands comprising a total of 0.57 acre of seasonal wetlands occur on the project site. The seasonal wetlands occur as two features: W-1 and W-2. Wetland W-1 is 0.53 acre and is in the south-central portion of the project site within the mapped AE flood zone. This wetland occurs as a broad swale feature that drains from the northeast to southwest towards Norton Slough/Foss Creek. Wetland W-2 is

0.04 acre and is fed by a storm drain culvert under the railroad tracks that flows onto the property and towards Foss Creek in an east–west direction.

The project would impact a total of 0.25 acre of existing seasonal wetlands and avoid 0.32 acre of wetlands. Removal of the federally protected wetlands would result in a significant impact unless mitigated. The project would implement **Mitigation Measure BIO-4** to compensate for the loss of 0.25 acre of wetlands.

Mitigation Measure BIO-4 would require the project to create 0.41 acre of new wetlands outside of the riparian setback. The wetland creation would occur on-site and would be in-kind with the same or similar wetland functions and values established for the project site including increasing the flood holding capacity of the project site. The upland areas between the riparian setback and proposed locations of Buildings 1 and 2, the outdoor areas, and the parking lot on the project site would drain toward the new wetlands. The new wetlands would be graded to meet the grade of the existing wetlands. Hydrology would be provided through direct precipitation and additional flow from property adjacent to the project site.

Therefore, with implementation of **Mitigation Measure BIO-4**, project impacts on wetlands, riparian habitats and other sensitive natural communities would be reduced to less-than-significant levels.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Wildlife movement includes migration (i.e., usually one way per season), inter-population movement (i.e., long-term genetic flow) and small travel pathways (i.e., daily movement corridors within an animal’s territory). While small travel pathways usually facilitate movement for daily home range activities such as foraging or escape from predators, they also provide connection between outlying populations and the main corridor, permitting an increase in gene flow among populations.

The project site is not within a Natural Landscape Block (defined as relatively natural habitat blocks that support native biodiversity) or an Essential Connectivity Area (defined as areas that are essential for ecological connectivity between blocks).

Movement corridors for large and small mammals do occur along Foss Creek. The undeveloped nature of the project site surrounded by commercial and industrial development on the east and west, but also to the north and south, allows for the project site to be used as a stepping-stone to areas farther north. Foss Creek allows for movement north and south despite the development in the area.

The open grasslands on the project site allow for unimpeded movement. The 1.75-acre permanent project impact area would remove a portion of this movement corridor. However, 1.95 acres would remain that would be unimpeded for wildlife movement. No construction activities or development would occur in Foss Creek or within the associated 35-foot riparian setback. As described above under Impact Question (a), western pond turtles use the upland habitat on-site as a movement corridor, a portion of which would be permanently removed; however, the remaining habitat would be sufficient for continued use by the western pond turtle. As a result, limited impacts to movement corridors for native resident or migratory fish or wildlife species would occur. With implementation of **Mitigation Measure BIO-1** identified above under Impact Question (a), potential impacts on movement corridors for wildlife species would be reduced to a less-than-significant level.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?

The City's tree ordinance is outlined in Chapter 20.24 Environmental and Historic Resources Protection, Article II Heritage Tree Protection. The purpose of these regulations is to protect certain trees in order to preserve cultural heritage, maintain and enhance the scenic beauty of the community, improve air quality, assist in abating soil and slope erosion, and preserve and enhance property values, thus promoting the public health, safety, and welfare. Heritage trees are defined as trees with a diameter of 30 inches or greater, measured 2 feet above the level ground, or any tree or group of trees identified by a City Council resolution that are of historic or significant value. The project site (not including the portion within the 35-foot-wide riparian setback on the western portion of site) contains 59 trees, eight of which must be removed for construction of the project. None of the trees proposed for removal are protected trees.

Municipal Code Section 20.16.100, Parking Lot Landscaping, requires the provision of one tree for every 10 parking spaces or 12 trees in the proposed parking lot; however, due to the existing Geysers wastewater pipeline easement, there is only sufficient space to provide 11 trees on the western side of the parking lot. Therefore, the project would seek a waiver under State Density Bonus Law of the parking lot tree requirement. With the waiver allowed by State law, the project would not conflict with local policies or ordinances related to tree preservation and impacts associated with the project would be less than significant.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There is no Habitat Conservation Plan or Natural Community Conservation Plan that applies to the project site; therefore, there would be no impact associated with the project.

2.4.4 Mitigation Measures

The project shall comply with all relevant measures identified in the *Biological Resources Assessment* prepared for the project as follows:

BIO-1 Western Pond Turtle Pre-Construction Survey. To prevent take of individuals, a pre-construction survey shall be conducted within 7 days prior to groundbreaking between January 1 and June 30 in the grasslands within the project impact area on the project site. If no western pond turtles are observed, no further action is required.

If pond turtles are observed in the grasslands, the California Department of Fish and Wildlife shall be contacted, and all construction activities will be delayed until an appropriate course of action is established and approved by the California Department of Fish and Wildlife. This may be as simple as establishing a drift fence around the project impact area to prevent turtles from moving into the project impact area.

If construction is delayed for more than 30 days from the survey, another pre-construction survey for western pond turtle shall be conducted.

BIO-2 Passerines and Raptors. To avoid or minimize impacts to passerines and raptors that may potentially nest in the trees within the project impact area during the nesting season between February 1 and August 30, the project shall comply with the following measures:

1. Grading or removal of nesting trees should be conducted outside the nesting season, which occurs between February 1 and August 30.
2. If grading between August 31 and January 31 is infeasible and groundbreaking must occur within the nesting season, a pre-construction nesting bird (both passerine and raptor) survey of the grasslands and trees within the project impact area shall be performed by a qualified biologist within 3 days of groundbreaking. If no nesting birds are observed, no further action is required, and grading shall occur within 1 week of the survey to prevent “take” of individual birds that could begin nesting after the survey.
3. If active bird nests (either passerine and/or raptor) are observed during the pre-construction survey, a disturbance-free buffer zone shall be established around the nest tree(s) until the young have fledged, as determined by a qualified biologist.
4. The radius of the required buffer zone can vary depending on the species, (i.e., 250 feet for passerines and 300 to 500 feet for raptors), with the dimensions of any required buffer zones to be determined by a qualified biologist in consultation with the California Department of Fish and Wildlife.
5. To delineate the buffer zone around a nesting tree, orange construction fencing shall be placed at the specified radius from the base of the tree within which no machinery or workers shall intrude.

After the fencing is in place there shall be no restrictions on grading or construction activities outside the prescribed buffer zones.

BIO-3

Tree-Roosting Bats Pre-Construction Survey. A qualified bat biologist must supervise tree removal for Trees 7, 15, 28, and 57 identified in Table 1 of the Biological Resources Assessment prepared for the project. To prevent take of individuals, a two-step methodology for tree removal shall be conducted over 2 consecutive days under the supervision of a qualified bat biologist. The tree removal company, under the direction of a qualified bat biologist, shall create noise and vibration on Day 1 by cutting non-habitat branches and limbs from habitat trees using chainsaws only (no excavators or other heavy machinery). On Day 2, the remainder of the tree shall be removed. Two-step tree removal must only occur during seasonal periods of bat activity, as follows:

- Between March 1 (or after evening temperatures rise above 45 degrees Fahrenheit [°F] and/or no more than 0.5 inch of rainfall within 24 hours occurs) and April 15, or
- Between September 1 and October 15 (or before evening temperatures fall below 45°F and/or more than 0.5 inch of rainfall within 24 hours occurs).

BIO-4

Section 404 Permit and 401 Certification. The project shall obtain a Section 404 nationwide permit from the U.S. Army Corps of Engineers along with a Section 401 water quality certification from the Regional Water Quality Control Board for the 0.25-acre impacts to the seasonal wetlands. A detailed wetland mitigation plan shall be developed as part of the permit process.

2.5 CULTURAL RESOURCES

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2.5.1 Environmental Evaluation

The *Cultural Resources Study for the Dry Creek Commons Project* was prepared for the project by Tom Origer and Associates. The following analysis incorporates the findings of this report, which has been included as **Appendix D** to this Initial Study.

2.5.2 Impact Analysis

a. Would the project cause a substantial adverse change in significance of a historical resource as defined in State CEQA Guidelines Section 15064.5?

The approximately 3.7-acre project site, including the 3.53-acre parcel and 0.17-acre off-site improvement area along Dry Creek Road, is currently vacant with no buildings or structures and has historically been used for agricultural purposes. The project consists of the construction of two, four-story apartment buildings totaling approximately 61,470 gross square feet, 104 vehicle parking spaces, and associated site improvements. The project requires excavation and removal of the underlying alluvial sediments to depths ranging 3 to 4 feet below ground surface.

The project site and 10 surrounding parcels were surveyed and catalogued as the architectural area of potential effects (APE) from the project. There is no evidence that the buildings within the architectural APE are associated with a historical context important to Sonoma County, such as agriculture or post-World War II development; therefore, they do not meet Criterion A of the National Register of Historic Places (National Register) (or Criterion 1 of the California Register of Historical Resources [California Register]). Preliminary research on past property owners of buildings show that they were not people important to local, state, or national history; therefore, the buildings on these parcels do not meet Criterion B of the National Register (or Criterion 2 of the California Register). All buildings within the architectural APE are architecturally indistinctive and do not meet Criterion C of the National Register (Criterion 3 of the California Register). Buildings do not generally contain data that meet Criterion D of the National Register (Criterion 4 of the California Register).

Although the SMART (formerly Northwestern Pacific Railroad) railroad tracks are adjacent to the project site and determined eligible for the National Register, this project would not have an adverse effect on this eligibility. The SMART railroad tracks were found eligible under Criterion A for its association with the economic, social, and transportation history of Healdsburg. The project will not affect the association this segment of railroad has with this historical event.

Therefore, implementation of the project would not have a substantial adverse change in the significance of a historical resource and there would be no project-related impacts.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines Section 15064.5?

A confidential search of the archaeological site base maps and records, survey reports, and other materials on file at the California Historical Resources Information System (CHRIS) at the Northwest Information Center (NWIC) was completed on November 9, 2021. The search included previous cultural resource studies and archaeological resources within the project site. No previously recorded cultural resources were identified within the project site.

The project site has a high potential for buried archaeological site indicators. This is because the project site lies on a landform that dates to the Holocene Epoch, its proximity to a source of fresh water, and because the project site is level in elevation. Due to this high potential, an intensive field survey and auger holes were excavated within the project site to look for buried deposits on November 16, 2021. No archaeological site indicators were observed during the course of the survey.

The records search results from the NWIC and the completed survey indicate that the project site does not contain any known historical or archaeological resources. Thus, implementation of the project would not cause a substantial adverse change in the significance of a historical or archaeological resource. However, archaeological resources could be discovered during grading, excavation, or other ground-disturbing activities. In the event of an accidental discovery, **Mitigation Measure CUL-1** would be implemented to reduce potential impacts on archaeological resources to a less-than-significant level.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Based on the NWIC records search and survey, no human remains or uses associated with human remains are known to exist within the project site. However, the discovery of human remains is always a possibility during ground-disturbing activities. In the event of an accidental discovery, **Mitigation Measure CUL-2** would be implemented to reduce potential impacts on human remains to a less-than-significant level.

2.5.3 Mitigation Measures

There are no known historical resources, archaeological resources, or human remains in the project area. The following mitigation measures are provided to avoid and/or reduce impacts to a less-than-significant level in the event unknown resources are encountered during project implementation.

CUL-1 The City of Healdsburg shall ensure that construction documents require the construction contractor to stop work in the event potentially significant cultural resources are accidentally discovered during construction and that State CEQA Guidelines Section 15064.5(f) be followed if archaeological sites are accidentally discovered.

If buried archaeological materials are encountered, all soil-disturbing work 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 completes a significance evaluation of the find(s) pursuant to Section 106 of the National Historic Preservation Act (36 Code of Federal Regulations 60.4). The developer shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Prehistoric

archaeological site indicators expected within the general area include chipped chert and obsidian tools and tool manufacture waste flakes; grinding and hammering implements that look like fist-size, river-tumbled stones; and for some rare sites, locally darkened soil that generally contains abundant archaeological specimens. Historical remains expected in the general area commonly include items of ceramic, glass, and metal. Features that might be present include structural remains (e.g., cabins or their foundations) and pits containing historical artifacts. The qualified archaeologist shall make recommendations concerning appropriate measures to be implemented to protect the resource, including, but not limited to, excavation and evaluation of the finds in accordance with State CEQA Guidelines Section 15064.5. Any previously undiscovered resources found during construction within the project site shall be recorded on appropriate California Department of Parks and Recreation 523 Series forms and will be submitted to the City of Healdsburg, Northwest Information Center, and State Historic Preservation Office, if required.

CUL-2 The City of Healdsburg shall ensure that construction documents require the construction contractor to stop work in the event that human remains are accidentally discovered during construction.

Pursuant to Health and Safety Code Section 7050.5, Public Resources Code Sections 5097.94 and 5097.98, and State CEQA Guidelines Section 15064.5(e), in the event that human remains are discovered during excavation and/or grading of the project site, all activity within a 100-foot radius of the find shall be stopped. The Sonoma County Coroner shall be notified immediately and shall make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission immediately and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendant of the deceased Native American. Once the Native American Heritage Commission identifies the most likely descendant, the most likely descendant will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the State CEQA Guidelines.

If the Native American Heritage Commission is unable to identify a most likely descendant or the most likely descendant does not make recommendations within 48 hours of being notified by the Native American Heritage Commission, the developer shall, with appropriate dignity, reinter the remains in an area of the project site secure from further disturbance. Alternatively, if the developer does not accept the most likely descendants' recommendations, the developer or the descendants may request mediation by the Native American Heritage Commission.

Additionally, State CEQA Guidelines Section 15064.5(d) requires that when an initial study identifies the existence, or the probable likelihood, of Native American human 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 an agreement 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.

2.6 ENERGY

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2.6.1 Impact Analysis

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction activities would consume energy in the form of gasoline and diesel fuel through the operation of heavy off-road equipment, trucks, and worker traffic. However, consumption of such resources would be temporary and would cease upon the completion of construction. As a standard condition of approval, the developer will be required to comply with General Plan Policy NR-28, which requires the use of BMPs, such as those promulgated by the BAAQMD, during construction to minimize emissions.³¹ As such, the proposed project would minimize the inefficient, wasteful, and unnecessary consumption of energy during construction by limiting idling times and requiring that all construction equipment be maintained and properly tuned in accordance with manufacturer’s specifications. Therefore, construction-related energy impacts would be less than significant.

Operation of the project would be subject to Titles 20 and 24 of the California Code of Regulations, which reduce demand for electrical energy by implementing energy-efficient standards for appliances and for residential buildings but also state requirements for local water efficient landscape ordinances, general conservation by water providers (e.g., Water Conservation Act of 2009 requiring a 20 percent reduction in per capita urban water use by 2020), and the mandate for energy providers to increase their reliance on renewable energy embodied in the Renewables Portfolio Standard. The 2030 General Plan includes goals (see 2030 Goal H-G Conservation of Energy) and related policies to promote energy conservation in residential development and reduce greenhouse gas emissions.³² The project would incorporate sustainable building practices, including solar arrays, all-electric design, low-impact development features, and water conservation to support the City’s sustainability goals and encourage conservation (consistent with General Plan Guiding Principle 4C and Policies H-G-2-3, H-G-5-9, PS-A-5, PS-B-2, and PS-C-3). The project would also be consistent with the type and intensity of development anticipated for the project site in the 2030 General Plan and meet the energy efficiency standards required by Title 24. Therefore, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources and impacts would be less than significant.

³¹ City of Healdsburg. 2015. *Healdsburg 2030 General Plan Policy Document*, p. 7-11. Available at: <https://healdsburg.gov/DocumentCenter/View/634/General-Plan-Policy-Documents-PDF>. Accessed May 2022.

³² City of Healdsburg. 2015. *Healdsburg 2030 General Plan Policy Document*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/634/General-Plan-Policy-Documents-PDF>. Accessed May 2022.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The project site is located in the North Coast Air Basin, where air quality is regulated by the NSCAPCD. The North Coast Air Basin is in attainment for all federal ambient air quality standards. Therefore, the NSCAPCD is not required to prepare or implement an air quality plan and there is no applicable air quality plan. As such, no impacts associated with the project would occur due to a conflict with the applicable air quality plan.

As described under Impact Question (a), the project would be designed in conformance with all state and local energy conservation standards, such as the requirements of the California Building Code (CBC) applicable at the time of permit issuance and would not conflict with or obstruct any other state or local plans for renewable energy or energy efficiency. Therefore, there would be no impact.

2.6.2 Mitigation Measures

None required.

2.7 GEOLOGY AND SOILS

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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"/>

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
(f) 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"/>

2.7.1 Environmental Evaluation

A preliminary geotechnical investigation (*Geotechnical Study Report*) was prepared for the project by RGH Consultants. The following analysis incorporates the findings of the study, which has been included as **Appendix E** to this Initial Study.

2.7.2 Environmental Setting

The City is located in northern Sonoma County within the central portion of the California Coast Range geomorphic province, a region characterized by northwest-trending valleys and mountain ranges. This alignment of valleys and ridges developed in response to uplift, folding, and faulting along the San Andreas system of active faults. The closest active faults to the project site are the Healdsburg-Rodgers Creek Fault, which crosses portions of the City, and the Maacama Fault, located approximately 4 miles north of the City.³³ The western and central portions of the City are characterized by low-lying, gently sloping topography. Hilly upland areas characterize its northern and eastern portions. The prevailing drainage patterns are to the west and south via intermittent creeks and drainage channels. Within the City, the most significant geologic hazards are those associated with earthquakes, including landslides, debris flows, and liquefaction. Other geologic hazards include expansive soils, erosion, and the general impact of grading.

2.7.3 Impact Analysis

- a. ***Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***
 - i. ***Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.***

According to the geologic map and literature review and field explorations conducted for the *Geotechnical Study Report*, the project site is not within a designated Alquist-Priolo Earthquake Fault Zone, there are no known active faults on or adjacent to the project site, and there is no evidence of existing faults or previous ground displacement on the project site due to fault movement. The closest active fault is the Healdsburg-Rodgers Creek fault, which passes through the eastern and northern areas of the City. Therefore, the risk of ground rupture at the project site due to faulting would be low, and impacts would be less than significant.

³³ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Geology and Soils*, p. IV.G.9, Figure IV.G-2 Fault Locations, and p. IV.G.11. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/680/Geology---Soils-PDF> and <https://www.ci.healdsburg.ca.us/DocumentCenter/View/709/IVG-2-Fault-Locations-PDF>. Accessed May 2022.

ii. Strong seismic ground shaking?

The project site is within a seismically active area in Northern California. According to the U.S. Geological Survey (USGS) and Association of Bay Area Governments (ABAG), the project site is susceptible to very strong to severe seismic ground shaking in the event of a major earthquake caused by a nearby active fault.³⁴ The 2030 General Plan Update EIR determined that the City has a 27 percent chance or higher of a large magnitude, 6.7 or higher, earthquake occurring along the Healdsburg-Rodger Creek Fault or the Hayward Fault in the next 30 years and a 62 percent or higher chance of a large earthquake occurring in the greater San Francisco Bay region by the year 2032.³⁵ Due to the proximity of active faults in the region, there would be a strong potential for ground shaking at the project site. Thus, the proposed four-story apartment buildings and associated site improvements would be susceptible to strong seismic ground shaking. The potential severity of ground shaking depends on many factors, including distance from the originating fault, the earthquake magnitude, and the nature of the subsurface materials.

The 2019 CBC, as adopted in Municipal Code Chapter 15.04, contains requirements for structural design, including seismic design specifications. The 2019 CBC requires that structures be designed and constructed to resist seismic hazards, including through foundation design and the completion of soil investigations prior to construction. The CBC also requires site-specific geotechnical investigations to evaluate soil stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, and expansiveness; and that the report provide recommendations on foundation type and design criteria.

The *Geotechnical Study Report* prepared for the project meets these CBC requirements, identifies project-specific structural specifications and recommendations to be included in the final building plans for the project and concludes that “the proposed improvements can be built as planned, provided the recommendations presented in this report are incorporated into their design and construction”.

All new structures would be required to conform to the seismic design parameters of the 2019 CBC. All proposed development would be required to adhere to federal, state, and local regulations pertaining to seismic safety design, thereby reducing and preventing potential impacts. The City’s Community Development Department, which encompasses both the Planning and Building Divisions, will review the project plans and soils report prior to issuance of building permits for the project to ensure compliance with CBC requirements related to earthquake-resistant construction. Therefore, with adherence to the building regulations, e.g., 2019 CBC, and the incorporation of **Mitigation Measure GEO-1**, impacts related to seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Liquefaction is defined as the sudden loss of soil strength due to a rapid increase in soil pore water pressure resulting from seismic ground shaking. The occurrence of this phenomenon is dependent on many complex factors including the intensity and duration of ground shaking, particle size distribution, and density of the soil. The potential for liquefaction is considered to be highest in areas underlain by saturated, unconsolidated, granular sediments. Within the City, areas most at risk from liquefaction are

³⁴ U.S. Geological Survey (USGS). 2014. Earthquake Hazards Program, Building Seismic Safety Council 2014 Event Set. Available at: <https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=14d2f75c7c4f4619936dac0d14e1e468>. Accessed May 2022; and Association of Bay Area Governments (ABAG). 2022. Hazard Viewer Map. Available at: <https://mtc.maps.arcgis.com/apps/webappviewer/index.html?id=4a6f3f1259df42eab29b35dfcd086fc8>. Accessed May 2022.

³⁵ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Geology and Soils*, p. IV.G.11. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/680/Geology---Soils-PDF>. Accessed May 2022.

alluvial areas along the banks of the Russian River and its major tributaries, including the project site.³⁶ According to the *Geotechnical Study Report* and as reflected in 2030 General Plan Update EIR Figure IV.G-3 Liquefaction Hazard Locations,³⁷ there are layers of subsurface soil on the project site that are susceptible to liquefaction. The ABAG interactive liquefaction susceptibility map shows that the project site is moderately susceptible to liquefaction during or immediately after a major seismic event.³⁸

The *Geotechnical Study Report* indicates that subsurface soils on the project site consist of poorly to moderately sorted sand, silt, gravel, and clay layers. Near-surface granular soils at the project site have a low potential for liquefaction; however, granular soils encountered below the groundwater level at depths of approximately 11.5 feet to 15.5 feet below ground surface are moderately prone to liquefaction. These potentially liquefiable soils are susceptible to settlement due to the densification of the liquefied soils. Liquefaction of these soil layers could cause up to 0.5-inch total settlement and 0.25-inch differential settlement. Although liquefaction often causes severe damage to structures, structural collapse is uncommon. Structures can be protected from liquefaction through installation of special foundations. Because of the moderate liquefaction potential, the foundation would need to be designed to accommodate settlement, as outlined in the *Geotechnical Study Report*. In addition, all new structures would be required to conform to the seismic design parameters of the 2019 CBC and adhere to federal, state, and local regulations pertaining to seismic safety design, thereby reducing and preventing potential impacts. In order to address concerns about unstable and weak, compressible soils, the *Geotechnical Study Report* provides several recommendations, including removal of these soils from construction areas and replacement with properly compacted and engineered fill and implementation of foundation support. Thus, compliance with building regulations and implementation of **Mitigation Measure GEO-1** would ensure that impacts related to seismic-related ground failure, including liquefaction, would be reduced to a less-than-significant level.

iv. Landslides?

Earthquakes or other natural events can trigger landslides that may cause injuries and damage many types of structures. However, landslides are typically a hazard on or near slopes or hillside areas, rather than generally level areas like the project site and vicinity. According to 2030 General Plan Update EIR Figure IV.G-4 Slope Hazard Zones, the project site is located in a relatively stable area, due to low slope inclinations, i.e., Zone A, the most stable zone, that encompass the near-level valley bottoms. Based on 2030 General Plan Update EIR Figure IV.G-5 Landslide Locations, no landslides have been mapped at or near the project site. Thus, published landslide maps do not indicate large-scale slope instability at the project site. In addition, active landslides were not observed at the project site during the site exploration. Although the project site is bordered by Foss Creek to the west, which is vulnerable to slope instability and sloughing due to erosion, the new buildings would be located east of the 35-foot-wide Foss Creek riparian corridor. Therefore, impacts related to landslides would be less than significant.

b. Would the project result in substantial soil erosion or the loss of topsoil?

The project site is relatively flat, ranging in elevation between 135 feet amsl in the northeast and 125 feet amsl in the southwest. Given this topography, the development of the project site is not expected to generate significant soil erosion and/or loss of topsoil. Nonetheless, site grading and earthwork could

³⁶ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Geology and Soils*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/680/Geology---Soils-PDF>. Accessed May 2022.

³⁷ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Figure IV.G-3 Liquefaction Hazard Locations*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/710/IVG-3-Liquefaction-Hazard-PDF>. Accessed May 2022.

³⁸ Association of Bay Area Governments (ABAG). 2022. Hazard Viewer Map. Available at: <https://mtc.maps.arcgis.com/apps/webappviewer/index.html?id=4a6f3f1259df42eab29b35dfcd086fc8>. Accessed May 2022.

potentially result in a substantial temporary increase in erosion or the loss of topsoil. During the construction phase, high winds, rainfall, or other storm events could contribute to erosion impacts. However, erosion control measures to be implemented during construction would be identified in the erosion and sediment control plan required for the project under Municipal Code Section 17.36, Grading and Erosion Control, and would be included in the Stormwater Pollution Prevention Plan (SWPPP) for construction. Construction-related erosion control and water quality BMPs identified in the SWPPP generally include soil stabilization techniques such as: hydroseeding and short-term biodegradable erosion control blankets; silt fences or some kind of inlet protection at downstream storm drain inlets; post-construction inspection of all drainage facilities for accumulated sediment; and post-construction clearing of all drainage facilities of debris and sediment. Additionally, the project would be constructed in accordance with the National Pollutant Discharge Elimination Systems (NPDES) Permit. Compliance with the NPDES Permit would include a Water Quality Management Plan (WQMP), a SWPPP, and implementation of BMPs aimed at reducing on-site soil erosion and the loss of on-site topsoil. Given the mandated conditions and standards that are required to be met, no significant adverse soil erosion or related soil erosion water quality impacts are expected. Therefore, impacts would be less than significant.

c. Would the project 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?

The *Geotechnical Study Report* concluded that it is geotechnically feasible to construct the project. The primary geotechnical concerns relate to weak, compressible upper soils; presence of soils susceptible to liquefaction; effects of uncontrolled surface runoff and groundwater seepage; and ground-shaking potential predicted to impact the project site.

Landslides

As stated above, the project site is located in a relatively stable area, due to its flat elevation, and proposed improvements would be developed on the east portion of site to limit effects on existing wetlands and avoid the Foss Creek riparian corridor. Therefore, landslides are unlikely to occur.

Lateral Spreading

Lateral spreading is horizontal/lateral ground movement of relatively flat-lying soil deposits towards a free face such as an excavation, channel, or open body of water. Typically, lateral spreading is associated with liquefaction of one or more subsurface layers near the bottom of the exposed slope. The majority of the project site is relatively level with minor grade variation. However, the project site is bordered to the west by Foss Creek, which is a geological feature that is associated with lateral spreading. The proposed improvements would be developed on the east portion of the project site to limit effects on existing wetlands and avoid the Foss Creek riparian corridor. Tests of boring samples conducted as part of the *Geotechnical Study Report* concluded that lateral spreading would not be a site hazard.

Subsidence

Land subsidence is a gradual settling or sudden sinking of the Earth's surface owing to subsurface movement of earth materials. Subsidence is most often attributed to human activity, mainly from the removal of subsurface water. Other principal causes of subsidence are aquifer system compaction, drainage of organic soils, underground mining, hydrocompaction, natural compaction, sinkholes, and thawing permafrost. The project site previously contained agricultural uses but has most recently been vacant undeveloped land with no buildings or structures since 1974.³⁹ There have been no known on-site

³⁹ Harris and Lee Environmental Sciences, LLC. 2021. *Phase 1 Environmental Site Assessment*. (See **Appendix F**.)

activities that required the removal of subsurface waters or drainage activities, which would have made the project site susceptible to subsidence. Therefore, impacts associated with subsidence would be less than significant.

Liquefaction

As noted, the project site is considered to have moderate susceptibility to liquefaction during or immediately following a significant seismic event. Because of the moderate liquefaction potential, the foundation would need to be designed to accommodate settlement. In addition, all new structures would be required to conform to the seismic design parameters of the 2019 CBC and to adhere to federal, state, and local regulations pertaining to seismic safety design, thereby reducing and preventing potential impacts. Thus, compliance with building regulations; adherence to federal, state, and local regulations; and implementation of **Mitigation Measure GEO-1**, which recommends the appropriate foundation systems, soil stability measures, on-site soil preparation, and compaction levels, would ensure that impacts related to unstable soils would be reduced to a less-than-significant level.

Collapse

The project site is not underlain by natural or man-made subsurface features that are typically associated with collapse, including mining or extraction operations or karst topography. All proposed development would be required to conform to the seismic design parameters of the 2019 CBC and to adhere to federal, state, and local regulations pertaining to seismic safety design, thereby reducing and preventing potential impacts. Compliance with building regulations; adherence to federal, state, and local regulations; and implementation of **Mitigation Measure GEO-1** would reduce potential impacts to less than significant.

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

Expansive surface soil shrinks and swells as it loses and gains moisture throughout the yearly weather cycle. Near the soil surface, the resulting movements can heave, and crack lightly loaded shallow foundations (spread footings), slabs and pavements. The zone of significant moisture variation (active layer) is dependent on the expansion potential of the soil and the extent of the dry season. The 2030 General Plan Update EIR identifies portions of the City as being underlain by expansive soils that can cause damage to structures due to the wetting and drying that occurs with soils.⁴⁰

As noted in the *Geotechnical Study Report*, the project site contains weak, compressible upper soils and an active layer of expansive soil ranging in thickness from about 2 to 3 feet. To address these concerns, several recommendations are provided including removal of weak, compressible soils from construction areas and replacement with properly compacted fill. With regards to expansive soil, the *Geotechnical Study Report* also includes recommendations when conducting excavation, exterior slabs and pavement, fill placement, and wall drainage and backfill. All proposed development would be required to conform to the seismic design parameters of the 2019 CBC and to adhere to federal, state, and local regulations pertaining to seismic safety design, thereby reducing and preventing potential impacts. Compliance with building regulations; adherence to federal, state, and local regulations; and implementation of **Mitigation Measure GEO-1** would ensure that impacts related to expansive soil would be reduced to a less-than-significant level.

⁴⁰ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Geology and Soils*, p. IV.G-25. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/680/Geology---Soils-PDF>. Accessed May 2022.

e. Would the project 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?

The project would be connected to the City's wastewater treatment system. No septic system is proposed. As a result, there would be no impact.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Project activities would include excavation to anticipated depths of approximately 3 to 4 feet. Any fossils present in the project area could be damaged by earth-disturbing activities (i.e., excavation and grading) more than 3 feet deep during project construction. Rocks of the Franciscan Assemblage (Jurassic), which have been known elsewhere to contain paleontological remains, underlie the northern portion of the City.⁴¹ Substantial damage to or destruction of significant paleontological resources as defined by the Society of Vertebrate Paleontology would be a significant impact.⁴² Although it is highly unlikely that previously unknown paleontological resources would be encountered during construction activities, ground-disturbing activities involve the possibility of such a discovery. Implementation of **Mitigation Measure GEO-2** would reduce this impact to a less-than-significant level.

2.7.4 Mitigation Measures

GEO-1 Geotechnical Conclusions and Recommendations. Prior to issuance of building permits, the project applicant shall submit plans to the City of Healdsburg for review and approval demonstrating project compliance with the 2019 California Building Standards Code seismic requirements, or the latest adopted edition, and the recommendations of a design-level geotechnical investigation. All soil engineering recommendations and structural foundations shall be designed by a licensed Professional Engineer. The approved plans shall be incorporated into the proposed project. All on-site soil engineering activities shall be conducted under the supervision of a licensed Geotechnical Engineer or Certified Engineering Geologist.

GEO-2 Discovery of Paleontological Resources. Project construction workers engaged in ground-disturbing activities shall receive training provided by a qualified professional paleontologist experienced in teaching non-specialists to ensure that they can recognize fossil materials in the event any are discovered during construction. Selection of these professionals shall be subject to City of Healdsburg approval; pursuant to Public Resources Code Section 21089 the developer shall bear the cost of this professional. The qualified paleontologist shall prepare a Paleontological Resources Alert Sheet to be approved by the City of Healdsburg.

Worker awareness training shall occur prior to start of construction and shall be provided to project construction workers engaged in ground-disturbing activities (e.g., excavation, utility installation). The developer and/or their designee shall ensure that project construction workers are trained on the contents of the Paleontological Resources Alert

⁴¹ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Geology and Soils*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/680/Geology---Soils-PDF>. Accessed May 2022.

⁴² Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee. 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources*. Available at: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf<http://vertpaleo.org/PDFS/24/2482305f-38f8-4c1b-934c-1022d264e621.pdf>. Accessed May 2022.

Sheet. The Paleontological Resources Alert Sheet shall be prominently displayed at the construction site during ground-disturbing activities for reference regarding potential paleontological resources.

The developer shall include a standard inadvertent discovery clause in every construction contract to inform the contractor and construction personnel of the immediate stop work procedures and other procedures to be followed if bones or other potential fossils are unearthed at the project site. Should new workers that will be involved in ground-disturbing construction activities begin employment after the initial training has occurred, the construction supervisor shall ensure that they receive the worker awareness training, as described above. Additionally, the developer shall complete a standard form/affidavit confirming the timing of the worker awareness training to the City of Healdsburg. The affidavit shall confirm the project's location, the date of training, the location of the informational handout display, and the number of participants. The affidavit shall be transmitted to the City of Healdsburg within 5 business days of conducting the training.

In the unlikely event that a paleontological resource is discovered during construction of the project, excavations within 50 feet of the find shall be temporarily halted or delayed until the discovery is examined by a qualified paleontologist in accordance with Society of Vertebrate Paleontology standards and Best Practices in Mitigation Paleontology (Murphey et al.2019). Work within the sensitive area shall resume only when deemed appropriate by the qualified paleontologist in consultation with the City of Healdsburg.

The qualified paleontologist shall determine: 1) if the discovery is scientifically significant; 2) the necessity for involving other responsible or resource agencies and stakeholders, if required or determined applicable; and 3) methods for resource recovery. If a paleontological resource assessment results in a determination that the resource is not scientifically important, this conclusion shall be documented in a Paleontological Evaluation Letter to demonstrate compliance with applicable statutory requirements (e.g., Federal Antiquities Act of 1906; State CEQA Guidelines Section 15064.5; California Public Resources Code Chapter 17, Section 5097.5; Paleontological Resources Preservation Act 2009). The Paleontological Evaluation Letter shall be submitted to the City of Healdsburg for review within 30 days of the discovery.

If the qualified paleontologist determines that a paleontological resource is of scientific importance, and there are no feasible measures to avoid disturbing this paleontological resource, the qualified paleontologist shall immediately prepare a Paleontological Mitigation Program consistent with the Society of Vertebrate Paleontology standards such that work can resume pursuant to Section 15064.5 (f) of the State CEQA Guidelines. The mitigation program shall include measures to fully document and recover the resource of scientific importance. The qualified paleontologist shall submit the mitigation program to the City for review and approval within 10 business days of the discovery. Upon approval by the City, ground disturbing activities in the project area shall resume and be monitored as determined by the qualified paleontologist for the duration of such activities.

The mitigation program shall include: 1) procedures for construction monitoring at the project site; 2) fossil preparation and identification procedures; 3) curation of paleontological resources of scientific importance into an appropriate repository; and 4) preparation of a Paleontological Resources Report (report or paleontology report) at the conclusion of ground disturbing activities. The report shall include dates of field work, results of monitoring, fossil identifications to the lowest possible taxonomic level,

analysis of the fossil collection, a discussion of the scientific significance of the fossil collection, conclusions, locality forms, an itemized list of specimens, and a repository receipt from the curation facility. The developer shall be responsible for the preparation and implementation of the mitigation program, in addition to any costs necessary to prepare and identify collected fossils, and for any curation fees charged by the paleontological repository. The paleontology report shall be submitted to the City of Healdsburg for review within 30 business days from conclusion of ground-disturbing activities, or as negotiated following consultation with the City of Healdsburg. The developer will be responsible for ensuring that recommendations regarding treatment and reporting are implemented.

2.8 GREENHOUSE GAS EMISSIONS

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2.8.1 Environmental Evaluation

An *Air Quality and Greenhouse Gas Impact Assessment* was prepared for the project by Stantec Consulting Services, Inc. The following analysis incorporates the findings of this report, which has been included as **Appendix B** to this Initial Study.

2.8.2 Environmental Setting

Certain gases in the earth’s atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth’s surface temperature. GHGs are responsible for “trapping” solar radiation in the earth’s atmosphere, a phenomenon known as the greenhouse effect. Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO₂), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Human-caused emissions of these GHGs in excess of natural ambient concentrations are believed responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth’s climate, known as global climate change or global warming. Emissions of GHGs contributing to global climate change are attributable, in large part, to human activities associated with on-road and off-road transportation, industrial/manufacturing, electricity generation by utilities and consumption by end users, residential and commercial on-site fuel usage, and agriculture and forestry. Emissions of CO₂ are, largely, by-products of fossil fuel combustion.

The quantity of GHGs in the atmosphere responsible for climate change is not precisely known, but it is enormous. No single project alone would measurably contribute to an incremental change in the global average temperature or to global or local climates or microclimates. From the standpoint of CEQA, GHG impacts relative to global climate change are inherently cumulative.

Several regulations currently exist related to GHG emissions, predominantly AB 32, Executive Order S-3-05, and Senate Bill (SB) 32. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. Executive Order S-3-05 established the GHG emission reduction target for the state to reduce to the 2000 level by 2010, the 1990 level by 2020 (AB 32), 40 percent below the 1990 level by 2030, and to 80 percent below the 1990 level by 2050 (SB 32).

2.8.2.1 SONOMA COUNTY CLIMATE ACTION PLAN

The Sonoma County Climate Action Plan (CAP) 2020 and Beyond was adopted in July 2016 with the goal of reducing county-wide emissions to 25 percent below 1990 levels by 2020. The CAP includes a series of measures to be adopted by cities and agencies in Sonoma County in order to reduce GHG emissions from the energy, transportation, land use, and other economic sectors. The CAP identifies specific GHG measures for every city within the county based on individual General Plans.

2.8.3 Impact Analysis

a. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Consistent with State CEQA Guidelines 15064.4, GHG emissions for the project were quantified using the California Emissions Estimator Model (CalEEMod) version 2020.4.0. CalEEMod populates the model with corresponding default assumptions based on the project's land uses, land use sizes, and location. The model prepared for this analysis relied on modeling default assumptions for the construction schedule, construction vehicle trips, and construction equipment. The construction schedule used in the analysis represents a "worst-case" analysis scenario since emission factors for construction equipment decrease as the analysis year increases, due to improvements in technology and more stringent regulatory requirements. As a result, construction emissions would decrease if the construction schedule moved to later years or was extended over a longer duration. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet.

Minor filling may be required for the project to lift the building footprint out of the floodplain. As a result, soil import was conservatively assumed to be approximately 2,800 cubic yards. An additional 2,500 cubic yards of soil would be cut and used as fill in other areas on-site. Project-generated vehicle trips estimated in the *Final Traffic Impact Study* prepared for the project (see **Appendix I**) were included in the model. Finally, all-natural gas and wood-burning devices were removed from the model to reflect the project's all-electric design.

Constructions Emission Inventory

Construction GHGs would be emitted by off-road construction equipment and by vehicle travel by workers and material deliveries to the project site. The estimated construction GHG emissions are shown in **Table 3: Construction Greenhouse Gas Emissions**. Because construction GHG emissions are temporary and reduction measures are limited, the construction emissions are amortized over the life of the project. A residential project is conservatively assumed to have a life of 30 years.

Table 3: Construction Greenhouse Gas Emissions

Construction Year	Metric Tons of Carbon Dioxide Equivalents
2022	270
2023	167
Total	437
Amortized over 30 years*	15

Sources: *Air Quality and Greenhouse Gas Impact Assessment*, 2022 (see **Appendix B**); CalEEMod 2020.4.0

* GHG emissions are amortized over the 30-year life of the project.

Operational Emission Inventory

The BAAQMD identified screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project would result in potentially significant GHG impacts. If all screening criteria are met by a project, then the lead agency or applicant would not need to perform a detailed, quantitative assessment of their project’s GHG emissions. The project proposes to construct a 58-unit, four-story residential apartment complex on a vacant site. The BAAQMD GHG screening criteria threshold for mid-rise apartments is 87 dwelling units. The project would fall below the BAAQMD GHG thresholds; however, the BAAQMD GHG thresholds were established to meet AB 32 and do not account for the emissions reductions necessary to meet the State’s 2030 GHG reduction goals under SB 32. As such, operational GHG emissions for the project were modeled within CalEEMod 2020.4.0 to estimate the long-term annual GHG emissions compared to an adjusted 2030 mass rate threshold of 660 metric tons of carbon dioxide equivalents per year. Sources of emissions may include motor vehicles and trucks, energy usage, water usage, waste generation, and area sources, such as landscaping activities and residential woodburning.

Operational GHG emissions for the project are shown in **Table 4: Operational Greenhouse Gas Emissions**.

Table 4: Operational Greenhouse Gas Emissions

Source	Emissions (metric tons of carbon dioxide equivalents per year)
Area	1
Energy	22
Mobile	268
Waste	14
Water	8
<i>Subtotal</i>	<i>313</i>
Amortized Construction Emissions	15
Total	328
Adjusted 2030 Mass Rate Thresholds	660
<i>Exceed?</i>	<i>No</i>

Sources: *Air Quality and Greenhouse Gas Impact Assessment* (see **Appendix B**); CalEEMod 2020.4.0

As shown in Table 4 above, the project’s GHG impact would not exceed the adjusted 2030 mass rate threshold of 660 metric tons of carbon dioxide equivalents per year. As a result, the project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. Therefore, the project’s impact would be less than significant.

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The project would have a significant impact with respect to GHG emissions and global climate change if it would substantially conflict with the provisions of Section 15064.4(b) of the State CEQA Guidelines. Pursuant to Appendix G of the State CEQA Guidelines, a significant GHG impact is identified if the project could conflict with applicable GHG reduction plans, policies, or regulations. The project would be subject to compliance with SB 32, CARB’s 2017 Scoping Plan, Sonoma County’s CAP, and the City’s applicable goals. SB 32 is a statewide reduction goal aimed at reducing emissions to 40 percent below 1990 levels by 2030. CARB’s 2017 Scoping Plan sets a framework for the State to meet the reduction targets of SB 32.

Consistency with the Sonoma County Climate Action Plan

Sonoma County adopted a CAP in 2016 to meet AB 32 reduction goals. The County’s CAP is aimed at reducing emissions from local governments and county-wide agencies and presents implementation measures specific to the City. Many of the measures listed in the CAP are derived from the 2030 General Plan and are not relevant to individual projects. **Table 5: Project Consistency with Applicable Sonoma County CAP’s Healdsburg Reduction Measures** identifies the measures applicable to the project and summarizes the project’s consistency with each measure.

Table 5: Project Consistency with Applicable Sonoma County CAP’s Healdsburg Reduction Measures

Measure	Consistency Determination
Building Energy	
<p>Green Building Program: Municipal Code Chapter 15.16 requires California Green Building Code compliance above and beyond the State Building Standards when any of the following are triggered:</p> <ol style="list-style-type: none"> 1. Reconstruction of residential buildings of any size—Mandatory Measures. 2. New residential construction over 3,000 square feet—Tier 1 Residential. 3. Reconstruction of nonresidential buildings containing 5,000 square feet or more—Mandatory Measures. 4. New nonresidential construction over 10,000 square feet—Tier 1 Nonresidential. 	<p>Consistent. The project would include over 3,000 square feet of new residential construction and would meet and exceed Tier 1 Residential standards. The project site is an infill site located near existing transit and future transit projects. The project would be an all-electric design and generate electricity on-site through solar paneling installed on the rooftop. Energy-efficient design features would include building orientation to maximize exposure to winter sun and avoid summer heat, incorporation of energy conservation features and materials that reduce energy consumption, including light-colored surface material that reflects heat.</p>
Land Use and Transportation	
<p>Foss Creek Pathway Plan: A 4.1-mile bike path running north and south through the City. Connects to Old Redwood Highway and Windsor.</p>	<p>Consistent. The City recently completed construction of the northern segment of the Foss Creek Pathway which runs near the project site on its eastern side. The project would support use of the pathway by encouraging alternative modes of transportation including walking and bicycling; providing ample, secure bicycle parking on-site; and designing the project to have easy access to the pathway.</p>
<p>Land uses surrounding transit: General Plan Policy LU-F-1. Land uses adjacent to transit facilities should derive maximum benefit from transit facilities and may include retail, office employment, and high-density residential uses.</p>	<p>Consistent. The project would construct 58 affordable residential units on an infill site located near existing transit services on Healdsburg Avenue and Grove Street and the SMART railroad tracks, which is planned for future passenger rail service.</p>
<p>Water and Wastewater Efficiency Resolution No. 58-2013: Stage 1 Voluntary Water Conservation Measures. Seeks a 20 percent reduction in water consumption from 2012.</p>	<p>Consistent. The project would incorporate sustainable building practices into the project design including water conservation measures. The project would comply with California Green Building Standards Code (CALGreen) standards which include water conservation measures.</p>

Measure	Consistency Determination
Ordinance No. 1077: Water Shortage Emergency Plan. City adopts Water Conservation Measures to be implemented in times of critical shortage.	Consistent: The project would incorporate sustainable building practices into the project design including water conservation measures. The project would comply with CALGreen standards which include water conservation measures.
Water Shortage Emergency Declaration Resolution No. 8-2014: Stage 2 Mandatory Water Conservation Measures - Requires implementation of Water Conservation Measures identified in the Water Shortage Emergency Plan.	Consistent: The project would incorporate sustainable building practices into the project design including water conservation measures. The project would comply with CAL Green standards which include water conservation measures.
Water Efficient Landscape Ordinance No. 1091: The ordinance promotes the efficient design and installation of water-efficient landscapes in the City associated with new construction and substantial alterations of existing development where landscapes are proposed.	Consistent. The project's landscaping would include drought-tolerant plant material that is native to the area.
Urban Forestry and Natural Areas	
Maximize Tree Protection: General Plan Policy NR-B-3 - New development shall be sited to maximize the protection of native tree species, riparian vegetation, important concentrations of native plants, and important wildlife habitat.	Consistent. The project would retain 51 of the 59 trees in the project work areas, plant 43 new trees, and develop 0.41 acre of new wetlands for a total of 0.73 acre of wetlands.

Source: *Air Quality and Greenhouse Gas Impact Assessment* (see **Appendix B**)

Consistency with the CARB Final 2017 Scoping Plan Update

CARB issued the Final 2017 Scoping Plan Update in November 2017 and established emissions reduction strategies necessary to meet SB 32's 2030 reduction goals. **Table 6: Project Consistency with Applicable 2017 Scoping Plan Greenhouse Gas Reduction Strategies** identifies the Scoping Plan policies that are applicable to the project.

Table 6: Project Consistency with Applicable 2017 Scoping Plan Greenhouse Gas Reduction Strategies

Measure Name	Measure Description	Consistency Determination
SB 350 50 percent Renewable Mandate	Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020 to 50 percent in 2030.	Consistent. The project would purchase electricity from the City subject to the SB 350 Renewable Mandate. In addition, the project includes renewable energy through rooftop solar systems on the proposed buildings and carports.
Low Carbon Fuel Standard	This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	Consistent. Vehicles accessing the project site would use fuel containing lower carbon content as the fuel standard is implemented.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario)	Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million zero-emission vehicles on the road by 2030 and increasing numbers of zero-emission trucks and buses.	Consistent. Future residents are anticipated to purchase increasing numbers of more fuel-efficient and zero-emission cars and trucks each year. The project would include 15 electric vehicle-ready parking spaces. Home deliveries would be made by increasing numbers of zero-emission delivery trucks.
Short-Lived Climate Pollutant Reduction Strategy	The strategy requires the reduction of short-lived climate pollutants by 40 percent from 2013 levels by 2030, and the reduction of black carbon by 50 percent from 2013 levels by 2030.	Consistent. The project would be all-electric. Therefore, the project would not generate black carbon from burning.

Measure Name	Measure Description	Consistency Determination
SB 375 Sustainable Communities Strategies	Requires Regional Transportation Plans to include a sustainable communities' strategy for reduction of per-capita vehicle miles traveled.	Consistent. The project would provide affordable housing in a region that is consistent with the growth projections in the applicable Regional Transportation Plan. The project would not be within a Sustainable Communities Strategies priority area and is not subject to requirements applicable to those areas. Furthermore, the project site lies near existing transit services along Healdsburg Avenue and Grove Street and the SMART right-of-way and railroad tracks where SMART is planning future passenger rail service. The project would also include bicycle parking to reduce vehicle miles traveled.
Post-2020 Cap-and-Trade Program	The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	Consistent. The post-2020 Cap-and-Trade Program indirectly affects people who use the products and services produced by the regulated industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the program's first compliance period. The project is consistent with this measure by virtue of its use of electricity from California public utilities.

Source of Measures: CARB (2017)

Source of Consistency Determination: *Air Quality and Greenhouse Gas Impact Assessment* (see **Appendix B**)

Based on this evaluation, the project would be consistent with all feasible and applicable strategies recommended in the CARB's 2017 Scoping Plan Update.

The project would construct 58 affordable residential units on an in-fill site. The project would include all-electric buildings with solar panels to generate electricity on-site. The project has been designed to include water- and energy-efficient features as well as passive solar design and native, drought tolerant landscaping. The project site is located near existing transit along Healdsburg Avenue and Grove Street and is near the SMART right-of-way and railroad tracks where SMART is planning future passenger rail service. The project would locate residents within walking distance of transit options and provide secure on-site bicycle parking. The project site is also located directly adjacent to the recently constructed Foss Creek Pathway. Finally, the project would adhere to Title 24 and the latest CBC Standards. The project would not conflict with the goals and objectives of the Sonoma County CAP, with CARB's 2017 Scoping Plan Update, or any other State or regional plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions.

In conclusion, the project would be consistent with all feasible and applicable strategies recommended in the Sonoma County CAP for the City. The project would not conflict with any other applicable plan, including CARB's 2017 Scoping Plan Update. Therefore, project impacts would be considered less than significant.

2.8.4 Mitigation Measures

None required.

2.9 HAZARDS AND HAZARDOUS MATERIALS

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2.9.1 Environmental Evaluation

A *Phase I Environmental Site Assessment* was prepared for the project by Harris and Lee Environmental Sciences, LLC. The following analysis incorporates the findings of this report, which has been included as **Appendix F** to this Initial Study.

2.9.2 Impact Analysis

a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Please refer to analysis under Impact Question (b). Impacts would be less than significant.

b. *Would the project 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?*

As a residential development, the project would not involve the regular use, storage, transport, or disposal of significant amounts of hazardous materials. Construction of the project 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. No hazardous materials would be used or stored on the project site, other than typical fuels and household materials used by future residents. The project would not create a significant hazard to the public or the environment because it is a residential project and project construction and operation would comply with applicable federal, state, and local laws pertaining to the safe handling and transport of hazardous materials. Therefore, impacts would be less than significant.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

There are no schools within 0.25 mile of the project site. Healdsburg High School is the closest school and is located approximately 0.5 mile southeast of the project site. Furthermore, the project would not involve the use of significant quantities of hazardous materials. Therefore, impacts would be less than significant.

d. Would the project 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?

The project site is not included on a list of hazardous materials sites and is residential in nature and would not create a significant hazard to the public or to the environment. Within a 1-mile radius of the project site, there are several properties with open and active environmental conditions. However, given the intervening distance, locations relative to site topography and groundwater flow direction, and the status of the listed sites (e.g., closed, contamination characterized, contamination under remediation), there are no sites that constitute a Recognized Environmental Condition for the project site. Therefore, development of the project site would not create a significant hazard to the public or the environment. Impacts would be less than significant.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The project site is not within an airport land use plan. The closest airport, Healdsburg Municipal Airport, is approximately 2 miles southeast of the project site. This intervening distance limits the potential for the project to create safety hazards or excessive noise for persons residing or working in the project area. Therefore, no impacts would occur.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

U.S. 101 and Healdsburg Avenue are the primary north-south roadways in the City. Dry Creek Road, between Healdsburg Avenue and U.S. 101, is an arterial street that provides a main entry into the City from U.S. 101.⁴³ U.S. 101, Healdsburg Avenue, and Dry Creek Road are used for emergency response

⁴³ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Aesthetics*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/682/Aesthetics-without-Graphics-PDF>. Accessed May 2022.

and identified as evacuation travel route options.⁴⁴ The project does not propose modifications to U.S. 101, Dry Creek Road, or Healdsburg Avenue that would impair or interfere with emergency response or evacuation (permanent road closures, lane narrowing, etc.). The project proposes modifications to Dry Creek Road to add a westbound through lane, sidewalk, landscaping, and other associated streetscape improvement that would temporarily redirect traffic during project construction. Given the short duration of construction as well as the City's traffic control requirements which require at least 72 hours advance notice of any lane closures or detours (Municipal Code Section 12.12.150), construction of the proposed modifications would not be expected to impair implementation of or physically interfere with the City's Local Hazard Mitigation Plan,⁴⁵ designated Evacuation Zones,⁴⁶ Guide to Emergency Preparedness,⁴⁷ or another adopted emergency response plan or emergency evacuation plan. The project would be designed to meet the requirements of the Healdsburg Fire Department for emergency access and would meet current standards for fire flow.⁴⁸ Therefore, the project would not result in a significant impact related to emergency response or evacuation and impacts would be less than significant.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Please refer Section 2.20 Wildfire, for further information and analysis related to wildland fires. Impacts would be less than significant.

2.9.3 Mitigation Measures

None required.

⁴⁴ City of Healdsburg. 2019. *Guide to Emergency Preparedness*. Available at: <https://ci.healdsburg.ca.us/DocumentCenter/View/9753/Emergency-Preparedness-Brochure-2019-English-and-Spanish>. Accessed May 2022.

⁴⁵ City of Healdsburg. 2018. *Local Hazard Mitigation Plan*. Available at: https://www.ci.healdsburg.ca.us/DocumentCenter/View/8644/2018-Healdsburg-LHMP_Public-Review-Draft. Accessed May 2022.

⁴⁶ City of Healdsburg. 2022. Emergency Services. Available at: <https://ci.healdsburg.ca.us/460/Emergency-Services>. Accessed May 2022.

⁴⁷ City of Healdsburg. 2019. *Guide to Emergency Preparedness*. Available at: <https://ci.healdsburg.ca.us/DocumentCenter/View/9753/Emergency-Preparedness-Brochure-2019-English-and-Spanish>. Accessed May 2022.

⁴⁸ Burbank Housing. 2022. Major Design Review Application Resubmittal Package for 155 Dry Creek Road. pp 3-5. April 12, 2022.

2.10 HYDROLOGY AND WATER QUALITY

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) 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"/>
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2.10.1 Environmental Evaluation

A *Hydrology and Hydraulic Analysis* and *Preliminary Storm Water Low Impact Development Plan* were prepared for the project by BKF Engineers. The following analysis incorporates the findings of these reports, which have been included as **Appendix G-1** and **Appendix G-2**, respectively, to this Initial Study.

2.10.2 Environmental Setting

The project site slopes west toward Foss Creek and consists of multiple small areas that experience sheet flow and collect to discharge areas along Foss Creek. A majority of the drainage sheet flows across the project site and concentrates at the southwest corner. One of these small areas in the northeast portion of the project site has a 24-inch-wide culvert coming from an off-site source located along the east side of the SMART railway tracks. This larger tributary area is made up of multiple cover types, including asphalt paving, gravel, and a sports field, and is approximately 15.6 acres with an average slope of 1.5 percent. The sheet flow from the larger tributary area is directed to the culvert which discharges to the project site and flows through the 0.04-acre portion of the on-site wetlands into Foss Creek. A small area along the south edge collects in an area drain which is connected to the City's storm drainage system. It discharges farther downstream into Foss Creek under the nearby bridge.

The project would permanently develop 1.75 acres of the 3.7-acre site, which includes the 3.53-acre parcel and the 0.17-acre off-site improvement area along Dry Creek Road. The project would construct 0.41 acre of new wetlands (for a total of 0.73 acre of wetlands) to offset the loss of 0.25 acre of wetlands. The total permanent and temporary disturbance would be 2.37 acres. After project completion, the new impervious surface area would be approximately 67,078 square feet and new pervious surfaces would total approximately 36,241 square feet. There would be approximately 3,350 square feet of bioretention basins for water quality management. The project would also include approximately 1,000 linear feet of piping for sewer, water, and electricity and approximately 9,000 square feet of landscaping.

2.10.3 Impact Analysis

a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water or groundwater quality?*

The Clean Water Act has nationally regulated the discharge of pollutants to the waters of the U.S. from any point source since 1972. In 1999, the California RWQCB adopted a Construction General Permit, and an NPDES permit that implements Clean Water Act Section 402(p)(2)(B). Construction activities are regulated by the RWQCB and are subject to the permitting requirements of the Construction General Permit. The RWQCB established the General Construction Permit program to reduce surface water impacts from construction activities. The General Construction Permit requires the preparation and implementation of a SWPPP for construction activities. Erosion and Sediment Control Plans and SWPPPs are regulated by Municipal Code Section 17.36, Grading and Erosion Control.

Construction of the project would require grading and other construction activities, which could allow surface water to carry sediment from on-site erosion and small quantities of pollutants to the west into Foss Creek, potentially affecting the local waterway by degrading water quality. Given that the project is anticipated to disturb more than one acre with construction, the project would prepare a SWPPP, which would include a description of appropriate BMPs to minimize the discharge of pollutants from the project site. Construction-related erosion control and water quality BMPs identified in the SWPPP generally include soil stabilization techniques such as: hydroseeding and short-term biodegradable erosion control blankets; silt fences or other inlet protection at downstream storm drain inlets; post-construction inspection of all drainage facilities for accumulated sediment; and post-construction clearing of all drainage facilities of debris and sediment. The SWPPP would include an Erosion and Sediment Control Plan with temporary stormwater BMPs required during different phases of construction. These standards are specifically designed to maintain potential water quality grading impacts at a less-than-significant level post-construction. Therefore, impacts related to water quality standards or waste discharge requirements would be less than significant.

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

The City is partially located in the North Coast Hydrologic Region, at the north end of the Santa Rosa Valley Groundwater Basin, and partially in the long and very narrow Healdsburg Area Subbasin No. 1 55.02 as identified in California Department of Water Resources Bulletin 118.⁴⁹ The Healdsburg Area subbasin includes the floodplain of the Russian River, where the City diverts potable water from wells along the Russian River and Dry Creek. Many smaller communities rely on the local surface water

⁴⁹ City of Healdsburg Utility Department. 2021. *2020 Urban Water Management Plan Update*. Available at: <https://ci.healdsburg.ca.us/DocumentCenter/View/13549/2020-Urban-Water-Management-Plan---Final?bidId=>. Accessed May 2022.

and groundwater systems in the North Coast Region. However, the City's water sources are solely from surface waters and do not use groundwater basins or aquifers.⁵⁰

The project's stormwater drainage system design encourages overland infiltration and directs runoff to bioretention basins. The project would be consistent with the type and intensity of development anticipated for the project site in the 2030 General Plan and Urban Water Management Plan; therefore, the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Impacts would be less than significant.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. Result in substantial erosion or siltation on- or off-site?**
- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**
- iv. Impede or redirect flood flows?**

Foss Creek runs along the western boundary of the project site. However, no construction activities or direct impacts would occur in the creek or within the 35-foot-wide riparian setback.

Given the elevation change, topography, and location, the project site would be impacted by surface runoff. Surface runoff typically sheet flows over the ground surface but can be concentrated by the planned site grading, landscaping, and drainage. The surface runoff can pond against structures and cause deeper than normal soil heave and/or seep into the slab rock. Therefore, the project would redirect surface runoff away from structures into the proposed storm drain system and encourage overland infiltration.

After construction of the project, the drainage conditions would generally match the existing conditions on the project site. The drainage system for the project was developed using the design criteria of Sonoma County Water Agency's Flood Management Design Manual (2020) and would be regulated by Municipal Code Chapter 13.28, Urban Storm Water Quality Management and Discharge Controls (see **Appendix G-1**). The project site's hardscape improvements would be along the east side of the project site nearest the SMART railroad tracks. The proposed wetland would be developed between the new hardscapes and the limit of the 35-foot-wide Foss Creek riparian corridor. Hardscape drainage would be collected in drain inlets and discharged to the project's bioretention basins at the northeast and southwest portions of site, in accordance with the MS4 permit and the Stormwater Low Impact Development design manual. An overflow drain inlet would connect into the existing storm drain system and discharge into Foss Creek. If the bioretention basins reach their saturation capacity in high flood storm events, excess water flow would be conveyed into the existing and proposed wetlands area. The proposed wetlands would be designed to retain a certain flow/volume level from high-frequency storm events in order to maintain infiltration and an approximate continuous saturation of the native and design soils.

Therefore, the project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted

⁵⁰ Ibid.

runoff. The project would also not substantially alter the existing drainage pattern of the project site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on-site or off-site or substantially increase the rate or amount of surface runoff in a manner that would result in flooding. As a result, impacts would be less than significant.

d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The project site is split between two Flood Insurance Rate Map (FIRM) Panels numbered 344 and 363 of 1106 (Map Number 06097C0344E and 06097C363E, respectively).⁵¹ The published FIRM indicates the majority of the project site is designated within Zone AE, which is an area determined to be within the 1 percent Special Flood Hazard Area where the base flood elevation has been determined. This corresponds with the 100-year storm event. The Federal Emergency Management Agency (FEMA) established approximate flood surface elevation for the project site which ranges from 129.4 feet to 133.8 feet amsl along Foss Creek.

Foss Creek is also designated as a Regulatory Floodway. The project would comply with Municipal Code Section 20.24.090, Riparian Setback Standards, and would be located outside the 35-foot setback from Foss Creek. In addition, the project would comply with all standards and provisions for flood hazard reduction outlined in Municipal Code Chapter 17.28, Floodplain Management Regulations, including construction of the project at least 1 foot above the base flood elevation.

The project is located inland and is not within an area that has the potential for seiche or tsunamis to occur. Therefore, impacts related to flood hazard, tsunami, or seiche zones would be less than significant.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The California Department of Water Resources has classified the Healdsburg Area Subbasin as a Very Low Priority basin under the Sustainable Groundwater Management Act. As the Healdsburg Area Subbasin is a very low priority groundwater basin/subbasin, the California Department of Water Resources does not require the formation of a Groundwater Sustainability Agency or development of a Groundwater Sustainability Plan.⁵²

The project is subject to the NPDES General Construction Permit and Municipal Code Chapter 13.28, Urban Storm Water Quality Management and Discharge Controls, which include performance standards and BMPs for pre-construction, construction, and post-construction to prevent and/or minimize the discharge of pollutants, including sediment, from the project site. No conflicts with a water quality control plan or sustainable groundwater management would occur as a result of the project. Therefore, impacts would be less than significant.

2.10.4 Mitigation Measures

None required.

⁵¹ Federal Emergency Management Agency (FEMA). 2008. National Flood Hazard Layer Viewer. Available at: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html>. Accessed May 2022.

⁵² Santa Rosa Plan Groundwater Sustainability Agency. 2022. *Groundwater Sustainability Plan*. Available at: <https://santarosaplgroundwater.org/gsp/>. Accessed May 2022.

2.11 LAND USE AND PLANNING

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2.11.1 Impact Analysis

a. *Would the project physically divide an established community?*

Construction of the proposed residential buildings would not physically divide the existing community. The project would create 58 new residential dwelling units in two multi-story buildings designed to be consistent with the surrounding commercial, industrial, and residential uses. Vehicle access into the project site would be provided from a private driveway off Dry Creek Road. Street improvements would be constructed along the Dry Creek Road frontage, closing an existing gap in the public sidewalk system in the project’s immediate vicinity. Therefore, the project would not physically divide an established community and there would be no impact as a result of the project.

b. *Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

As reflected in the 2030 General Plan, the project site is designated MU with an allowed density of 10 to 16 units per acre.⁵³ Stand-alone residential development is allowed under the MU designation provided it does not undermine the overall purpose and character of the designation.⁵⁴ The MU designation allows for a maximum of 57 units; therefore, the project requests a State Density Bonus to allow for one additional unit, for a total of 58 units. This represents an increase from 16 dwelling units per acre allowed under the MU designation to 17.4 dwelling units per acre.

The project site is also zoned MU. Per Municipal Code Section 20.08.155, multifamily dwellings not a part of a mixed-use development are a use allowed by right in the district. Municipal Code Section 20.28.105 states that residential projects with two or more residential units per site which involve the development of vacant land with site and building improvements require Major Design Review, subject to the approval of the Planning Commission at a public hearing. Therefore, the project would undergo Major Design Review.

Per Municipal Code Section 20.08.170, the maximum height allowed in the MU Zoning District is 50 feet. However, as the project site is located adjacent to another parcel zoned MU which allows multifamily dwellings by right, the maximum height allowed on the project site is 40 feet. To maximize

⁵³ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Land Use Map*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/635/General-Plan-Land-Use-Map-PDF>. Accessed May 2022.

⁵⁴ City of Healdsburg. 2015. *Healdsburg 2030 General Plan Policy Document*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/634/General-Plan-Policy-Documents-PDF>. Accessed May 2022.

the density on the project site while also minimizing the impact to existing wetlands, the project proposes a more compact footprint with two four-story buildings with a roof ridge and parapet maximum height of 47 feet (and a maximum height of 56 feet for the stairwells). As provided for by State Density Bonus Law, the project requests a height waiver of 7 to 10 feet to allow for the increased height, to maximize the density on the project site, and to minimize the impact to the existing wetlands. As noted below, strict adherence to the project site's maximum height limits, while minimizing the impacts to the existing wetlands, would physically preclude the development of 58 affordable housing units and would result in a loss of affordable housing units.

The project would meet and exceed the parking requirements of the State Density Bonus Law. However, Municipal Code Section 20.16.150 requires one parking space per unit to be located in a garage or carport. The project site is physically precluded from meeting the City's covered parking requirements due to the existence of a 20-foot-wide easement associated with the Geysers wastewater pipeline that runs the entire length of the eastern property line. Therefore, the project requests a covered parking waiver to provide uncovered parking spaces not located in a garage or carport.

Per Municipal Code Section 20.08.175, Residential Development Standards, a minimum of 200 square feet of usable open space shall be provided per dwelling unit. Given the project's proximity to the Foss Creek Pathway, Healdsburg Community Center and Carson Warner Memorial Skatepark, as well as the provision of ample indoor and outdoor common open space, the project requests a reduction to the usable outdoor open space requirement from the required 11,600 square feet to 10,225 square feet. Without these waivers, the project would be physically precluded from providing 58 units of affordable housing as an approximately 18,262 additional square feet of building footprint and an approximately 1,375 additional square feet of outdoor open space would be needed, which would result in additional impacts to wetlands and additional area for mitigation which could not be accommodated on-site. Without the addition of a fourth story to the project, the project would be physically precluded from developing the density proposed and would result in a loss of approximately 16 affordable housing units. Furthermore, the provision of additional outdoor space and the requirement to provide covered parking would also result in the loss of additional units.

Given the project's status as a 100 percent affordable housing project subject to State Density Bonus Law, the project is entitled to incentives, concessions, and waivers that provide relief from development standards. Therefore, with the inclusion of the proposed incentives and waivers the project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As a result, impacts would be less than significant.

2.11.2 Mitigation Measures

None required.

2.12 MINERAL RESOURCES

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<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"/>

2.12.1 Impact Analysis

a. *Would the project 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?*

Please refer to analysis under Impact Question (b). No impacts would occur.

b. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

The project is zoned MU and is not located within an area designated by the CDOC as a Mineral Resource Zone-2, which indicates the existence of a deposit that meets certain criteria for value and marketability.⁵⁵ Mineral Resource Zone-2 is located in the southeastern area of the City primarily along the banks of the Russian River. The portion of the Russian River within the vicinity of the City has been mined extensively for sand and gravel resources. However, the project site is not within the vicinity of the Russian River. Neither the project site nor the surrounding area is identified as an area containing mineral deposits of local, statewide, or regional significance. Therefore, no impacts to mineral resources of local, regional, or statewide significance or a locally important mineral resource recovery site would occur.

2.12.2 Mitigation Measures

None required.

⁵⁵ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Mineral Resources* and Figure IV.K-1. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/675/Mineral-Resources-PDF> and <https://healdsburg.gov/DocumentCenter/View/716/IVK-1-Mineral-Resource-Zone-PDF>. Accessed May 2022.

2.13 NOISE

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project result in:</i>				
(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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"/>

2.13.1 Environmental Evaluation

A *Noise Assessment: Dry Creek Commons Development Project* was prepared for the project by Stantec Consulting Services, Inc. The following analysis incorporates the findings of this report, which has been included as **Appendix H** to this Initial Study.

2.13.2 Environmental Setting

2.13.2.1 NOISE FUNDAMENTALS AND TERMINOLOGY

Noise is generally defined as unwanted sound that annoys or disturbs people and potentially causes an adverse psychological or physiological effect on human health. Because noise can interfere with human activities, evaluation of noise is necessary when considering the environmental impacts of a proposed project.

Sound is mechanical energy (vibration) transmitted by pressure waves over a medium such as air or water. Sound is characterized by various parameters that include the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude). Sound pressure level is the most common descriptor used to characterize the loudness of an existing sound level.

Although the decibel (dB) scale, a logarithmic scale, is used to quantify sound intensity, it does not accurately describe how sound intensity is perceived by human hearing. The perceived loudness of sound is dependent upon many factors, including sound pressure level and frequency content. The human ear is not equally sensitive to all frequencies in the entire spectrum, so noise measurements are weighted more heavily for frequencies to which humans are sensitive in a process called A-weighting, written as dB(A) and referred to as A-weighted decibels. There is a strong correlation between A-weighted sound levels and community response to noise. For this reason, the A-weighted sound level has become the standard tool of environmental noise assessment.

Different types of measurements are used to characterize the time-varying nature of sound. These measurements include the equivalent sound level (Leq), the minimum and maximum sound levels (Lmin and Lmax), percentile-exceeded sound levels (such as L10, L20), the day-night sound level (Ldn), and the

community noise equivalent level (CNEL). Ldn and CNEL values often differ by less than 1 dB. As a matter of practice, Ldn and CNEL values are considered to be equivalent.

With respect to how humans perceive and react to changes in noise levels, a 1 dB(A) increase is imperceptible, a 3 dB(A) increase is barely perceptible, a 5 dB(A) increase is clearly noticeable, and a 10 dB(A) increase is subjectively perceived as approximately twice as loud. These subjective reactions to changes in noise levels were developed on the basis of test subjects' reactions to changes in the levels of steady-state pure tones or broadband noise and to changes in levels of a given noise source. These statistical indicators are thought to be most applicable to noise levels in the range of 50 to 70 dB(A), as this is the usual range of voice and interior noise levels. A number of agencies and municipalities have developed or adopted noise level standards, consistent with these and other similar studies, to help prevent annoyance and to protect against the degradation of the existing noise environment.

For a point source such as a stationary compressor or construction equipment, sound attenuates based on geometry at a rate of 6 dB per doubling of distance. For a line source such as free-flowing traffic on a freeway, sound attenuates at a rate of 3 dB per doubling of distance. Atmospheric conditions including wind, temperature gradients, and humidity can change how sound propagates over distance and can affect the level of sound received at a given location. The degree to which the ground surface absorbs acoustical energy also affects sound propagation. Sound that travels over an acoustically absorptive surface, such as grass, attenuates at a slightly greater rate than sound that travels over a hard surface, such as pavement. The increased attenuation is typically in the range of 1–2 dB per doubling of distance. Barriers, such as buildings and topography that block the line of sight between a source and receiver, also increase the attenuation of sound over distance.

2.13.2.2 VIBRATION

Vibration is like noise in that noise involves a source, a transmission path, and a receiver. While related to noise, vibration differs in that noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. As with noise, vibration consists of an amplitude and frequency. A person's perception to vibration depends on their individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system that is vibrating.

Vibration can be measured in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration in terms of peak particle velocity in inches per second (in/sec PPV). Standards pertaining to perception as well as damage to structures have been developed for vibration levels defined in terms of in/sec PPV.

Human and structural response to different vibration levels is influenced by a number of factors, including ground type, distance between source and receptor, duration, and the number of perceived vibration events. The general threshold at which human annoyance could occur is 0.1 PPV for continuous/frequent sources and the threshold for damage to typical residential and commercial structures ranges from 0.3 to 0.5 PPV for continuous/frequent sources.

Operation of heavy construction equipment, particularly pile driving, and other impact devices, such as pavement breakers, create seismic waves that radiate along the surface of the ground and downward into the earth. These surface waves can be felt as ground vibration. Vibration from the operation of this equipment can result in effects ranging from annoyance of people to damage of structures. Varying geology and distance will result in different vibration levels containing different frequencies and displacements. In all cases, vibration amplitudes will decrease with increasing distance. Perceptible groundborne vibration is generally limited to areas within a few hundred feet of construction activities.

2.13.2.3 SENSITIVE RECEPTORS

Some land uses are more tolerant of noise than others. For example, schools, hospitals, churches, and residences are considered to be more sensitive to noise intrusion than commercial or industrial facilities. Ambient noise levels can also affect the perceived desirability or livability of a development.

The project site is surrounded by a mix of land uses, including commercial buildings to the west and northwest along Grove Street, and to the east across the SMART railroad tracks. The nearest residences are located on the same site as Plank Coffee along Grove Street, approximately 63 feet west of the project site and the Foss Creek corridor, and the closest multifamily residential building is the Citrine Apartments building at 1260 Grove Street, approximately 360 south of the project site along Grove Street south of Dry Creek Road. The closest single-family residential neighborhood to the project site is approximately 800 feet to the east along March Avenue across Healdsburg Avenue. For purposes of the noise analysis hotel uses are also considered noise-sensitive receptors. The Hotel Trio and Hotel Vinea across Dry Creek Road to the south are approximately 127 feet from the southern property line of the project site.

2.13.3 Impact Analysis

a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The project site is within the City limits and is designated as MU. The existing ambient noise environment was documented through a noise survey. The primary noise source in the project vicinity is traffic along Dry Creek Road. Measured average ambient noise levels at the project site range from 55.2 dB(A) on the northeast portion of the project site to 66.3 dB(A) on the northeast portion of the project site. The 2030 General Plan Update EIR indicates that future noise levels along Dry Creek Road would range from 64 dB(A) to 70 dB(A).⁵⁶ Additionally, due to the presence of the SMART rail line and planned service, an average ambient noise level of 68.8 dB(A) was assumed for the project site. Noise levels in the project area would be influenced by construction activities and from the operation of the proposed project.

The City established Land Use Compatibility for Community Noise Environments for residential and non-residential land uses in the 2030 General Plan Safety Element (Figure 10). According to the City's land use compatibility standards, environments with noise levels up to 65 dB(A) are considered normally acceptable. Environments with noise levels between 60 dB(A) and 70 dB(A) are considered conditionally acceptable for the multifamily residential land use development, provided new construction or development is undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, normally suffice.

New development must be generally consistent with the Land Use Compatibility for Community Noise Environments guidelines contained in the Safety Element and must adhere to the City's ordinance regulating excessive noise. The City requires noise studies and field measurements for new development that would place a noise-sensitive land use near an existing or potentially intrusive noise source, such as a freeway, arterial street, or railroad. The City also requires the inclusion of design techniques in new construction that minimize noise impacts, including building location and orientation, building design

⁵⁶ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Figure IV.L-2*. Available at: <https://healdsburg.gov/DocumentCenter/View/718/IVL-2-Future-Noise-Contours-PDF>. Accessed June 2022.

features, and placement of noise-tolerant components (parking, utility areas, and maintenance facilities) between noise sources and the sensitive receptor areas where necessary to meet the Land Use Compatibility for Community Noise Environments standards.

The City has also established noise performance standards to control excessive noise in the community. The applicable standards for these activities are specified in Municipal Code Section 9.32, Noise. For example, the City has adopted sound level standards that prohibit industrial-zoned properties from creating excessive noise levels in excess of 65 dB(A) for daytime exterior sound and 55 dB(A) for nighttime exterior sound level as measured at any adjacent residential-zoned property. However, noise and vibration created by construction, repair, remodeling, or grading of any real property are exempt from the noise performance standards of the Municipal Code, provided these activities created do not endanger the public health, welfare, and safety and activities occur between the nighttime hours of 6:00 p.m. and 7:30 a.m. daily, or at any time on Sunday or a legal holiday. Nothing in Municipal Code Chapter 9 shall be interpreted to prohibit construction activities that do not exceed the ambient noise level by more than 10 dB(A), such as painting or interior work. Noise produced by railroad vehicles and noise produced by delivery vehicles regulated by the California Public Utilities Commission and associated loading and unloading of merchandise are also exempt from the provisions of the noise municipal codes.

Construction Noise

The project's construction activities are expected to occur over a period of approximately 12 to 18 months. Construction truck and construction worker vehicle access to the project site would be provided along Dry Creek Road at the location of the proposed driveway. Construction staging would occur along the eastern portion of the project site where the parking lot is proposed. Two types of short-term noise impacts could occur during project construction.

The first type of noise is from construction crew vehicular commutes. Construction crew commutes would incrementally increase noise levels on access roads leading to the project site. The construction of the project would involve an estimated peak of 29 construction worker vehicles and six vendor vehicles per day (35 vehicles total) traveling to and from the project site. Assuming a worst-case of all worker vehicles entering or exiting the project site at the same time, 35 vehicles would be added to the peak-hour traffic volume on Dry Creek Road. Adding 35 vehicles to the existing traffic on Dry Creek Road would represent a 3.2 percent increase in traffic volumes, which would equate to a 0.128 dB(A) increase in noise, which would not be a perceptible increase (3 dB(A)) in traffic noise. Thus, the short-term construction worker-related traffic increases would result in a less-than-significant noise-related impact.

The second type of noise generated during project construction would be from the on-site construction activity. Construction activities would include demolition, site preparation, grading, building construction, paving, and architectural coating. Each construction stage has its own mix of equipment, and consequently, its own noise characteristics. The various construction operations would change the character of the noise generated at the project site and, therefore, the noise level as construction progresses. The loudest stages of project construction include the demolition and grading stages, as the noisiest construction equipment is typically earthmoving and grading equipment.

Project construction would be conducted in six stages and each stage would use different construction equipment. **Table 7: Summary of Federal Highway Administration Roadway Construction Noise Model** lists the types of construction equipment and the maximum and average operational noise level as measured at 127 feet from the operating equipment. The 127-foot distance represents the approximate distance between the project and the closest noise-sensitive receptor at the Hotel Trio. The 127-foot distance also represents the approximate distance between the residences to the west near Plank Coffee and the proposed work areas east of the 35-foot-wide Foss Creek riparian corridor which would be located between 110 feet and 200 feet to the east.

Table 7: Summary of Federal Highway Administration Roadway Construction Noise Model

Construction Equipment Source at the Distance to Sound Level at Receptor	Nearest Sensitive Receptor (feet)	Lmax, dB(A)	Acoustical Use Factor (%)	Leq, dB(A)
Backhoe	127	69.5	40	65.5
Concrete saw	127	81.5	20	74.5
Crane, tower crane	127	72.5	16	64.5
Concrete mixer truck	127	70.7	40	66.7
Compressor (air)	127	69.6	40	65.6
Dozer	127	73.6	40	69.6
Forklift (Gradall)	127	75.3	40	71.3
Front-end loader	127	71.0	40	67.0
Generator	127	72.5	50	69.5
Grader	127	76.9	40	72.9
Haul truck	127	68.4	40	64.4
Paver / paving equipment	127	69.1	50	66.1
Roller	127	71.9	20	64.9
Scraper	127	75.5	40	71.5
Tractor	127	75.9	40	71.9
Welder	127	65.9	40	61.9

Sources: *Noise Assessment: Dry Creek Commons Development Project* (see **Appendix H**); Federal Highway Administration Roadway Construction Noise Model v1.1 (2008)

A worst-case condition for construction activity would assume all noise-generating equipment were operating at the same time and at the same distance from the closest noise-sensitive receptor. Using this assumption, the Roadway Construction Noise Model program calculated the following combined Leq and Lmax noise levels from each stage of project construction (see **Table 8: Calculated Noise Level from Each Construction Stage**).

Table 8: Calculated Noise Level from Each Construction Stage

Construction Phase	Distance to Closest Noise Sensitive Receptors (feet)	Calculated Lmax, dB(A)	Calculated Leq, dB(A)
Demolition	63 feet west and 127 feet south	89.6 and 83.5	84.0 and 77.9
Site preparation	63 feet west and 127 feet south	87.0 and 80.9	83.0 and 76.9
Grading	63 feet west and 127 feet south	88.1 and 82.0	84.1 and 78.0
Building construction	63 feet west and 127 feet south	88.0 and 81.9	83.8 and 77.7
Paving	63 feet west and 127 feet south	86.0 and 79.9	81.5 and 75.4
Architectural coating	63 feet west and 127 feet south	75.7 and 69.6	71.7 and 65.6

Source: *Noise Assessment: Dry Creek Commons Development Project* (see **Appendix H**)

At this distance, worst-case construction noise levels during the loudest phase of construction could range up to approximately 78 dB(A) at the hotels and up to approximately 84.1 dB(A) at the residences to the west near Grove Street if multiple pieces of heavy construction equipment were operated simultaneously at the nearest construction footprint area.

Although noise levels from project construction could fall into the “Unacceptable” range above 70 dB(A), as defined by Policy S-G-1 of the 2030 General Plan, increases in noise levels from construction activities would be temporary.⁵⁷ Construction activities would be limited to the restrictions set by Policy S-25 of the 2030 General Plan and Paragraph 9.32.080.A of the Municipal Code.

Policy S-25 states the following:

Where construction occurs that would result in a potentially significant impact on noise-sensitive uses, require use of noise-reducing measures that may include the following:

- Equip internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and are appropriate for the equipment.
- Locate stationary noise-generating equipment as far as possible from sensitive receptors in the vicinity.
- Utilize “quiet” air compressors and other stationary noise sources where technology exists.
- Erect temporary noise control blanket barriers in a manner to shield noise sensitive uses.
- Control noise levels from workers’ amplified music so that sounds are not audible to sensitive receptors in the vicinity.
- Designate a “disturbance coordinator” responsible for responding to complaints about project construction noise and taking reasonable measures to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in any notice sent to neighbors regarding the construction schedule.

Municipal Code Paragraph 9.32.080.A states the following:

Noise sources associated with, or vibration created by construction, repair, remodeling, or grading of any real property or during authorized seismic surveys are permitted, provided such activities do not take place between the nighttime hours of 6:00 p.m. and 7:30 a.m. daily, or at any time on Sunday or a legal holiday, and provided the noise level created by such activities and any vibration created does not endanger the public health, welfare, and safety.

In conclusion, construction noise would be short-term, temporary, and intermittent. Furthermore, construction activity would comply with all of the City’s construction hours and noise standards contained in both the Municipal Code and the 2030 General Plan and as a result, impacts would be less than significant.

Long-Term Operational Impacts

The primary sources of project-related operational noise would be project-related traffic as well as project-related stationary noise sources, such as parking lot activities and new mechanical ventilation equipment. Other noise sources of concern in the project vicinity that could affect the proposed noise-sensitive land use is the potential future activity on the SMART rail line to the east of the project site. A significant impact would occur if the project would be exposed to noise levels in excess of the City’s normally acceptable standard of 65 dB(A) for new noise-sensitive land use development, or if the project would result in noise level increases that could cause the noise levels at adjacent noise-sensitive land uses to be exposed to noise levels above normally acceptable standards.

⁵⁷ City of Healdsburg. 2015. *Healdsburg 2030 General Plan Policy Document*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/634/General-Plan-Policy-Documents-PDF>. Accessed May 2022.

Exterior Traffic Noise

Traffic noise depends primarily on vehicle speed (tire noise increases with speed), proportion of medium and large truck traffic (trucks generate engine, exhaust, and wind noise in addition to tire noise), and number of speed control devices, such as traffic lights and stop signs (accelerating and decelerating vehicles and trucks can generate more noise).

Changes in traffic volumes can also have an impact on overall traffic noise levels. For example, it takes 25 percent more traffic volume to produce an increase of only 1 dB(A) in the ambient noise level. For roads already heavy with traffic volume, an increase in traffic numbers could even reduce noise because the heavier volumes could slow down the average speed of the vehicles. A doubling of traffic volume results in a 3 dB(A) increase in noise levels.

To describe future noise levels due to project-generated traffic, a.m. and p.m. peak hour existing and existing plus project traffic volumes and traffic distribution patterns were used to determine the percentage increase of traffic on the roads adjacent to the project site and nearby sensitive receptors. The project would generate an average of 263 trips per weekday, including 21 a.m. peak hour trips and 23 p.m. peak hour trips (see **Appendix I**). These new trips represent the increase in traffic associated with the project compared to existing volumes.

Table 9: Traffic Peak Hour Volumes and Estimated Noise Increase shows the peak hour volumes associated with traffic on the local roadway network under the existing and existing plus project traffic conditions. The last columns in the table show the overall percentage change and the estimated difference in peak-hour noise level in dB(A).

The project would be expected to minimally increase traffic volumes along Dry Creek Road and the surrounding roadways. As a result, project-generated traffic would produce an imperceptible change in traffic noise levels over the baseline conditions at the neighboring sensitive receptors. Therefore, traffic noise impacts of the proposed project would be a less than significant, and no mitigation would be required.

Table 9: Traffic Peak Hour Volumes and Estimated Noise Increase

Roadway Intersection	Existing Peak-Hour Traffic Volumes	Existing Peak-Hour Traffic Volumes with Project	Percentage Change	Estimated dB(A) Change
U.S. 101 South and Dry Creek Road	1,094 (1,290)	1,098 (1,296)	0.37% (0.47%)	0.015 (0.019)
U.S. 101 North and Dry Creek Road	1,669 (1,763)	1,676 (1,778)	0.42% (0.85%)	0.017 (0.034)
Grove Street and Dry Creek Road	1,728 (1,977)	1,737 (1,995)	0.52% (0.91%)	0.021 (0.036)
Healdsburg Avenue and Dry Creek Road – March Avenue	1,705 (1,949)	1,707 (1,953)	0.12% (0.21%)	0.005 (0.008)

Source: *Noise Assessment: Dry Creek Commons Development Project* (see **Appendix H**).

Note: Numbers in parenthesis are p.m. peak-hour traffic volumes; numbers not in parenthesis are a.m. peak-hour traffic volumes.

Exterior Rail Noise

The SMART rail line is located to the east of the project site. Although there is currently no active use of this rail line, it is planned for future commuter use. As described above, the ambient noise level with future train service would be expected to average 68.8 dB(A) Ldn, assuming a direct line of sight, at approximately 100 feet from the centerline of the railroad. The loudest one-second noise level recorded from one train pass-by was 69.6 dB(A). The average noise level generated by a 2 minute, 28 second train

pass by was 60.1 dB(A). The nearest proposed façade is the east elevation of Building 2, which would be located approximately 100 feet from the centerline of the rail line.

Assuming as a worst case that the residences and the occupied non-residential spaces within the multi-family buildings could be exposed to a one-hour maximum noise level of 69.6 dB(A) Leq and average day-night noise levels of up to 68.8 dB(A) Ldn from future railroad activity; these noise levels would be considered “conditionally acceptable” for new multifamily residential land use development. According to the City’s policies, new development may occur under these conditions provided needed noise insulation features are included in the design to maintain normally acceptable interior noise levels, typically defined to be 45 dB(A) Ldn, for areas where sleeping would occur.

Interior Noise

RESIDENTIAL UNITS

The CBC states the interior noise levels attributable to exterior sources shall not exceed 45 dB(A) Ldn in any habitable room within multifamily residential units. The needed sound isolation requirements of a building’s exterior façade are dependent on:

- the dimension of the rooms with exterior windows;
- the finishes within the rooms;
- the ratio of clear glass to solid wall in the exterior wall assembly; and
- the exterior solid wall construction.

Modern construction with punch windows typically provides a 25 dB(A) exterior-to-interior noise level reduction with the windows closed and approximately 15 dB(A) with windows open. Therefore, sensitive receptors exposed to an exterior noise level of 70 dB(A) Ldn or less will typically comply with the CBC-required interior noise level standard. Modern construction utilizing window walls, curtainwalls, or a high ratio of exterior clear glass will provide less reduction with the windows closed. Buildings using a high amount of glass will typically comply with the CBC-required interior noise level standard if exposed to exterior noise levels of 67 dB(A) Ldn or less.

The project’s building elevations show the residential units with punch windows and not a high ratio of window wall. Noise levels experienced at the project site, including future SMART train activity (at 68.8 dB(A) Ldn), would be expected to be below the 70 dB(A) Ldn threshold for buildings with punch windows. Standard construction with a window system achieving a minimum Outside-Inside Transmission Class (OITC) rating of OITC 22 would be sufficient to achieve the CBC interior noise requirement for residential units. The project would include window systems for the multi-family buildings that range from OITC 29 to 33.⁵⁸ Therefore, noise from exterior vehicular and rail traffic within the residential units would be less than significant.

OCCUPIED NON-GUESTROOM SPACES

The California Green Building Standards Code (CALGreen) states if an occupied non-guestroom space (i.e., lobby, community room, offices) is exposed to a noise level of 65 dB(A) Leq 1-hour during any hour of operation, the exterior façade design shall incorporate features to reduce noise inside the spaces to a maximum of 50 dB(A) Leq 1-hour. Given the project site may be exposed to hourly noise levels up to 69.6 dB(A) Leq, the building would be subject to the CALGreen requirements.

⁵⁸ Burbank Housing. 2022. Major Design Review Application Resubmittal Package for 155 Dry Creek Road, Additional Information – Cutsheets for Vinyl Windows – VPI Endurance Series. April 12, 2022.

Assuming a worst-case condition of the non-residential occupied spaces being finished with a hard-surfaced floor, hard ceiling, and punch windows, windows with a minimum rating of OITC 18 would be required to help achieve the code-dictated maximum 50 dB(A) 1-hour Leq noise level. A typical 1-inch-thick insulating glass unit constructed of ¼-inch glass – ½-inch airspace – ¼-inch glass has an expected rating of OITC 26. The project would include ground floor window systems for the multi-family buildings that range from OITC 26 to 30.⁵⁹ Therefore, standard construction would be acceptable for the non-residential areas to achieve the CALGreen code requirement and traffic and rail noise levels would have a less-than-significant impact.

Therefore, implementation of the project design features described above would reduce any potential noise impacts from exterior traffic and rail noise sources to a less-than-significant level.

Stationary Noise Sources

Development of the project would result in new stationary noise sources, including noise from parking lot activities, trash collection, and new mechanical equipment operations on the project site. Parking lot activities on the northeast portion of the project site would generate noise as a result of vehicle starts, people conversing, and doors slamming. The project would have a fully enclosed trash room at the northeast corner of Building 2 facing the SMART railroad and would generate noise due to trucks beeping and trash, recycling, and compost bin tipping. The closest off-site noise-sensitive receptors are the Hotel Trio south of the project site on the other side of Dry Creek Road and the residences to the west of the project site near Plank Coffee along Grove Street. These receptors are located more than 127 feet south and more than 200 feet west, respectively, from the proposed parking lot and trash collection activities. The Hotel Trio and nearby residences experience similar noise levels from parking lot and trash collection activities on their own sites. Activity from parking lots, garbage truck traffic, and trash pickup would be similar to current conditions in the project vicinity, and due to their intermittent nature and short duration, these activities would not result in a perceptible increase in ambient noise levels. Therefore, project-related parking lot and trash collection activities would not result in exposure of persons to noise levels in excess of existing standards, nor would they result in a substantial permanent increase in ambient noise levels compared with existing noise levels.

Typical multifamily residential buildings include new rooftop mechanical equipment, such as condensing units and exhaust fans. This equipment generates noise that can radiate to the neighboring properties. The noise from this equipment is required to comply with Paragraph 9.32.080 in the Municipal Code. Thus, when the on-site equipment is selected, the equipment would be designed to incorporate measures such as shielding, barriers, and/or appropriate attenuators to reduce noise levels that may affect nearby properties. In addition, nighttime noise limits would be applicable to any stationary equipment required to operate between the hours of 8:00 p.m. and 7:00 a.m.

Therefore, with adherence to City requirements identified in the 2030 General Plan and Municipal Ordinance Chapter 9, Noise, for on-site fixed-source noise equipment, development of the project would not result in exposure of the neighboring properties to noise levels in excess of existing standards, nor would they result in a substantial permanent increase in ambient noise levels compared with existing noise levels. Thus, operational noise impacts would be less than significant.

⁵⁹ Burbank Housing. 2022. Major Design Review Application Resubmittal Package for 155 Dry Creek Road, Additional Information – Cutsheets for Storefront – Old Castle Series 3000 Storefront. April 12, 2022.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction Vibration Impacts

During construction of the project, equipment such as trucks, bulldozers, and rollers may be used as close as 127 feet from the nearest noise-sensitive receptor, i.e., the approximate distance between the project site’s southern boundary and the Hotel Trio and the approximate distance between the residences to the west near Plank Coffee and the proposed work areas east of the 35-foot-wide Foss Creek riparian corridor which would be located between 110 feet and 200 feet to the east. Equipment used during project construction could generate vibration levels between 0.0003 PPV and 0.0183 PPV at 127 feet, as shown below in **Table 10: Estimated Vibration Levels for Construction Equipment**. All estimated vibration levels for typical vibration-producing construction equipment would be below the Federal Transit Administration vibration threshold at which human annoyance could occur (0.1 PPV) and below the threshold for potential building damage (0.3–0.5 PPV). The project would comply with Municipal Code Section 20.24.005, Vibration, which prevents any “use, activity, or process shall produce vibrations that are perceptible without instruments by a reasonable person at the property lines of a site.”⁶⁰ Therefore, impacts from construction vibration would be less than significant.

Table 10: Estimated Vibration Levels for Construction Equipment

Type of Equipment	Peak Particle Velocity at 127 Feet	Threshold at which Human Annoyance Could Occur	Potential for Proposed Project to Exceed Threshold
Large bulldozer	0.0078	0.10	No
Loaded trucks	0.0066	0.10	No
Small bulldozer	0.0003	0.10	No
Vibratory roller	0.0183	0.10	No

Sources: *Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual*, September 2018; *Noise Assessment: Dry Creek Commons Development Project* (see **Appendix H**)

Operational Vibration Impacts

The project would not include any permanent noise sources that would expose persons to excessive groundborne vibration or noise levels. Potential sources of groundborne vibration in the project vicinity would include vibration from future railroad activity along the SMART rail line, located 100 feet east of the Building 2 facade. According to the Federal Transit Administration, the screening distance for potential groundborne vibration impacts from intermediate capacity rail activity for residential-type land uses is 100 feet. As the SMART rail line is located 100 feet away from the façade of proposed Building 2, exposure of persons to excessive groundborne vibration from passenger rail service on the SMART rail line would be considered a less-than-significant impact.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?

The project site is located approximately 2 miles southeast of the Healdsburg Municipal Airport. As shown in Exhibit 11 Current Noise Contours and Exhibit 12 Future Noise Contours of the Airport Master

⁶⁰ City of Healdsburg, Municipal Code Chapter 20.24, Environmental and Historic Resources Protection. Available at: <https://www.codepublishing.com/CA/Healdsburg/#!/Healdsburg20/Healdsburg2024.html#20.24>. Accessed May 2022.

Plan, the project site is not within the 55 CNEL noise contours.⁶¹ In addition, the project site is not located within the boundaries of an airport land use plan. Therefore, there would be no impacts associated with exposure to airport noise.

2.13.4 Mitigation Measures

None required.

2.14 POPULATION AND HOUSING

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2.14.1 Environmental Setting

The City’s 2015–2023 Housing Element is a strategic planning process to identify and analyze existing and projected housing needs in order to preserve, improve, and develop housing for all economic segments of the community.⁶² The City is currently in the process of drafting the 2023–2031 Housing Element.

Municipal Code Chapter 17.24, Growth Control Measures, originally enacted in 2000, sets forth an established annual quantified limit on the rate of residential growth. However, affordable housing units are exempted from this growth management initiative. Given that the residential units are exclusively affordable housing units, this policy does not apply to the project.

According to the U.S. Census Bureau, in April 2020, the City’s population was 11,340 residents, with an average household size of 2.51 persons.⁶³ The 2015–2023 Housing Element estimated the housing inventory in the City to be 4,904 housing units, 79 percent of which were single-family detached and attached homes.⁶⁴

⁶¹ Wadell Engineering Corporation. 2006. *Healdsburg Municipal Airport Master Plan 2025*. Available at: <https://ci.healdsburg.ca.us/DocumentCenter/View/587/Airport-Master-Plan---2006-PDF>. Accessed May 2022.

⁶² City of Healdsburg. 2015. *Healdsburg Housing Element 2015-2023*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/5437/Adopted-Housing-Element>. Accessed May 2022.

⁶³ U.S. Census Bureau. 2021. Quickfacts. Available at: <https://www.census.gov/quickfacts/healdsburgcitycalifornia>. Accessed May 2022.

⁶⁴ City of Healdsburg, 2015. *Healdsburg Housing Element 2015-2023*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/5437/Adopted-Housing-Element>. Accessed May 2022.

2.14.2 Impact Analysis

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

The project would construct 58 residential units on a 3.7-acre project site, which includes the 3.53-acre parcel and an adjacent 0.17-acre off-site improvement area along Dry Creek Road. Using the City’s average household size of 2.51, the project could house approximately 146 residents.⁶⁵ This represents an increase of 1.29 percent relative to the City’s 2020 estimated population of 11,340 residents.

The project would add 58 new affordable residential units to the City’s housing inventory, which would be consistent with the 2015–2023 Housing Element goal to build additional affordable housing. In addition, the project site is designated for mixed use development in the 2030 General Plan and Zoning Ordinance; therefore, the population increase associated with the project would be considered planned growth. The project site is surrounded by urban land uses and served by existing utilities (roadways, potable water, sewer, electricity, natural gas, etc.). Although the project would introduce new residents to the City, development of the project site was planned for in the City’s 2030 General Plan and the implementation of the project would not induce substantial population growth within the City. Therefore, impacts related to unplanned population growth would be less than significant.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project site is currently vacant; no residential housing units exist on the project site. The project would not result in a net loss of housing, nor would it necessitate the construction of replacement housing. There would be no impact.

2.14.3 Mitigation Measures

None required.

2.15 PUBLIC SERVICES

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<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"/>

⁶⁵ U.S. Census Bureau, 2021. Quickfacts. Available at: <https://www.census.gov/quickfacts/healthsburgetcalitycalifornia>. Accessed May 2022.

2.15.1 Environmental Setting

2.15.1.1 FIRE PROTECTION

Fire protection and emergency response services are provided by the Healdsburg Fire Department (HFD) for all areas within the incorporated limits of the City and City-owned properties outside of the City limits. The HFD, in conjunction with the California Department of Forestry and Fire Protection (CAL FIRE), the Geyserville Fire District, and the Sonoma County Department of Emergency Services established a Mutual Threat Zone in 1996 for those areas that encompass the Fitch Mountain area, including the ridgeline to its north.⁶⁶ For any fire calls within the Mutual Threat Zone during fire season, aid is provided by all three agencies. Since much of these lands are also within CAL FIRE's State Responsibility Areas, the HFD works closely with CAL FIRE on any response.

The only HFD fire station is located at 601 Healdsburg Avenue. Staff resources include 12 full-time firefighters and approximately 22 reserve volunteer firefighters.⁶⁷ The ratio of firefighters to population is currently 0.94 firefighters per thousand residents. The HFD has historically relied upon reserve volunteer firefighters to meet the demand for service created by call volume. However, this has become more difficult as training requirements have grown and most people have less time to dedicate to the HFD.⁶⁸ The HFD maintains a standard response goal of less than five minutes and averages a four-minute response time for medical and fire emergencies within the City limits.

Medical emergency response is provided by both the HFD, which provides basic life support, and Bell's Ambulance Service, which provides advanced life support and transport to medical facilities. Bell's Ambulance Service is a private company serving both the City and the surrounding area. As with fire emergencies, four to six minutes is considered the maximum acceptable response time for most medical emergencies.

2.15.1.2 POLICE PROTECTION

Police services are provided by the Healdsburg Police Department (HPD). The HPD station is located at 238 Center Street, approximately 1.3 miles south of the project site. The HPD currently employs 18 sworn officers, including the Chief of Police, and 12 civilian employees. The HPD currently maintains an officer-to-population ratio of 1:644.

The HPD receives approximately 16,000 calls annually for service (889 calls per sworn officer). The HPD maintains an emergency response time of 2 to 3 minutes throughout the City for emergency calls through the use of mobile units.⁶⁹

2.15.1.3 SCHOOLS

Healdsburg Unified School District (HUSD) operates four schools within the City. These schools include one elementary school on two campuses, Healdsburg Elementary (grades K through 2) and Fitch

⁶⁶ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Public Services*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/670/Public-Services-PDF>. Accessed May 2022.

⁶⁷ City of Healdsburg. 2022. "Fire Department." Available at: <https://ci.healdsburg.ca.us/248/Fire-Department>. Accessed May 2022.

⁶⁸ City of Healdsburg. 2022. "Fire Department." The HFD has strived to maintain an equivalent of one firefighter per 1,000 persons. Available at: <https://ci.healdsburg.ca.us/248/Fire-Department>. Accessed May 2022.

⁶⁹ City of Healdsburg. 2022. "Fire Department" Available at: <https://ci.healdsburg.ca.us/248/Fire-Department>. Accessed May 2022.

Mountain Campus (grades 3 through 5), as well as Healdsburg Junior High School (grades 6 through 8), Healdsburg High School (grades 9 through 12), and one continuation high school, Marce Becerra Academy.⁷⁰ HUSD enrollment in the 2020-2021 school year had a total of 1,317 students: 473 students at the elementary school, 293 students at Healdsburg Junior High, 516 students at Healdsburg High, and 35 students at Marce Becerra Academy.⁷¹

There are four additional schools that are not part of the HUSD, but whose students attend the HUSD's junior high and high school. Alexander Valley Elementary School and the Westside Elementary School contribute students to Healdsburg Junior High and Healdsburg High School. St. John the Baptist Catholic School and the Healdsburg School are both private schools and also contribute students to Healdsburg High School.⁷² HUSD and the private schools have the capacity to accommodate 4,774 students.⁷³ The HUSD has open enrollment, which means any student wishing to enroll in HUSD schools may do so after filling out an application. The HUSD accepts students from other districts as well after they have submitted an inter-district transfer application.

2.15.1.4 PARKS AND OTHER PUBLIC FACILITIES

The City's Community Services Department operates and maintains a variety of parks and recreational facilities throughout the City. The Community Services Department's service area is the same as that of the HUSD.

In addition to the facilities at HUSD schools, there are 15 parks and facilities within the City.⁷⁴ Dog parks are also provided at Badger Park and Villa Chanticleer. The City also maintains the Fitch Mountain Open Space Preserve and Healdsburg Ridge Open Space Reserve. In addition, Sonoma County operates and maintains the Veterans Memorial Beach Park, located on the east side of the Russian River just south of Healdsburg Avenue.

Including the City's eight neighborhood and community parks as well as Healdsburg Plaza, West Plaza Park, Carson Warner Memorial Skate Park, and the County's Veterans Memorial Beach Park, but excluding the Tayman Park Golf Course, Villa Chanticleer, Municipal Pool, and Senior Center, the City currently has total public park acreage of 43.32 acres.⁷⁵ A joint use agreement with the HUSD provides another 25 acres of school athletic fields that are also available for limited community use.

The City's goal is to provide 5 acres of developed neighborhood and community parkland per 1,000 residents. Based on the current City population of approximately 11,340 residents, the City should have approximately 57 acres of developed neighborhood and community parks. The City is currently deficient by approximately 16 acres in meeting the goal of developed neighborhood and community park acreage relative to population.

⁷⁰ Healdsburg Unified School District. 2022. "Who We Are." Available at: <https://healdsburgusd-ca.schoolloop.com/whowear>. Accessed May 2022.

⁷¹ Education Data Partnership, California Department of Education. 2022. "Healdsburg Unified." Available at: <http://www.ed-data.org/district/Sonoma/Healdsburg-Unified>. Accessed May 2022.

⁷² Healdsburg Unified School District. 2022. "Who We Are." Available at: <https://healdsburgusd-ca.schoolloop.com/whowear>. Accessed May 2022.

⁷³ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Public Services*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/670/Public-Services-PDF>. Accessed May 2022.

⁷⁴ City of Healdsburg. "Parks & Facilities." Available at: <https://www.ci.healdsburg.ca.us/281/Parks-Facilities>. Accessed May 2022.

⁷⁵ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Public Services*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/670/Public-Services-PDF>. Accessed May 2022.

There are five park projects planned for the City through 2025.⁷⁶ These projects include major improvements to Badger Park and the Fitch Mountain Park and Open Space Preserve, a pedestrian walkway extension from the Foss Creek Pathway titled the Mill District Connectivity Project, and the redevelopment of the former Purity building into a community gathering space and farmer's market. In addition, the City will the construct Montage Healdsburg Park, a new 36-acre passive and active public recreation area. Approximately \$8.5 million dollars of transient occupancy tax revenue is anticipated to come into the City in fiscal year 2022/2023, a portion of which will be dedicated to community services such as management and operation of park and recreational facilities.⁷⁷ This source of funds will enable the City to design and construct additional parks and recreational facilities, consistent with its adopted Master Plan.

2.15.2 Impact Analysis

a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?*

The project would develop 58 residential units on a 3.7-acre project site. The project site includes the 3.53-acre parcel, which is designated as MU and planned for development under the City's 2030 General Plan, and an adjacent 0.17-acre off-site improvement area along Dry Creek Road. Project implementation would result in a population increase of approximately 146 residents, resulting in a minor incremental increase in demand for fire protection services relative to the population of the City. In accordance with California Government Code Section 53090, the project would pay a fee to offset the increased demand.⁷⁸ The City's standard conditions of approval would require the provision of a fire flow analysis to ensure adequate water pressure and flow rates are available on-site for firefighting purposes.

The project would comply with Municipal Code Chapter 15.08, Fire Prevention, which requires the installation and maintenance of an automatic fire sprinkler system in all newly constructed buildings, including each multifamily dwelling unit. The project would also comply with all applicable Fire Code requirements associated with adequate fire access, fire flows, and number of hydrants. Project implementation would not increase the HFD's response times to the project site or surrounding vicinity; thus, no additional fire personnel or equipment would be necessary to serve the project. The project would not physically alter existing fire protection facilities, nor require the construction of new facilities. In addition, the project site is located within an urban, built-up area of the City with adequate response times and infrastructure; thus, the project would not significantly increase the demand for fire protection services. Therefore, the impact would be less than significant.

⁷⁶ City of Healdsburg. 2020. 2020-25 Five-Year Capital Improvements Program Summary. Available at: https://www.ci.healdsburg.ca.us/DocumentCenter/View/13397/2020-25-CS-CIP-Final-081020_2. Accessed May 2022.

⁷⁷ City Of Healdsburg. 2022. "City Council/Redevelopment Successor Agency Meeting Agenda: Fiscal Year 2022-23 and 2023-24 Budget and Capital Improvement Plan Adoption." Available at: <https://healdsburgca.iqm2.com/Citizens/FileOpen.aspx?Type=1&ID=2145&Inline=True>. Accessed July 2022.

⁷⁸ City of Healdsburg. 2018. "Development Fees, Multi-Family Residential Dwelling Units." Available at: <https://www.ci.healdsburg.ca.us/456/Fees>. Accessed May 2022.

b. 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 police protection?

As stated above, the HPD would provide police protection services to the project. The HPD officer-to-population-ratio is 1:644, and the project would not significantly increase that ratio. The project would not physically alter police protection facilities, nor would the project create an environment generally associated with unlawful activities requiring increased law enforcement services. The project would not inhibit HPD's response times, and the increased population would not warrant construction of a new police station. In accordance with California Government Code Section 53090, the project would be required to pay a fee to offset the increased demand associated with any additional services. Therefore, the impacts would be less than significant.

c. 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 schools?

The HUSD would serve the project site. The project's 58 residential units could result in an increased demand for school services. Based on a student generation rate of 0.6 student per dwelling (2030 General Plan Figure IV.N-17), the project would generate approximately 39 new students. Students from the project site would attend the following educational facilities:

- Healdsburg Elementary or Fitch Mountain Elementary, located approximately east of the project site
- Healdsburg Junior High, located southeast of the project site
- Healdsburg High and Marce Becerra Academy, a continuation high school, located southeast of the project site

California Government Code Section 65996 stipulates that a project must provide school impact fees to ensure adequate school and related facilities will be available and that the development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation." Given that HUSD enrollment is significantly decreased, the addition of 39 new students would not exceed the District's capacity. Therefore, with payment of school impact fees project impacts related to schools would be less than significant.

d. 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 parks?

The project would construct 58 residential units on a 3.7-acre project site, which includes a 3.53-acre parcel and 0.17-acre off-site improvement area along Dry Creek Road. The project would house approximately 146 residents. The project would construct approximately 10,225 square feet of outdoor open space. As stated under Section 2.11, Land Use and Planning, the project would request an Open Space Waiver under State Density Bonus Law from the City to allow for the decrease of usable outdoor open space from the required 11,600 square feet to 10,225 square feet.

As noted above, the City is currently below its goal of 5 acres of developed neighborhood and community parkland per 1,000 residents by approximately 16 acres. The addition of approximately 146 residents would incrementally increase the use of existing neighborhood and regional parks, as well as other recreational facilities. However, it would not substantially increase the City’s parkland deficiency; although the residents may be new, the project is consistent with the intensity of development and increase in population anticipated in the 2030 General Plan. As previously noted, a portion of the transient occupancy tax revenue in fiscal year 2022/2023 will be dedicated to community services, such as management and operation of park and recreational facilities. This source of funds will enable the City to design and construct additional parks and recreational facilities, consistent with its adopted Master Plan.

The project is within one mile of the Healdsburg Community Center, Carson Warner Memorial Skatepark, and Byron Gibbs Park. The population increase would not be substantial enough to result in physical deterioration of existing parks or other recreational facilities. In accordance with Municipal Code Section 17.08.350, the developer would be required to dedicate land or pay a fee in-lieu thereof, or both, for park and recreational purposes. With the required compliance with the City’s in-lieu fee requirements, the project’s impact to recreational facilities would be less than significant.

e. 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 other public facilities?

The Healdsburg Regional Library is located approximately 1 mile south of the project site, and the Healdsburg Community Center is located approximately 0.7 mile north of the project site. The addition of approximately 146 new residents would create an incremental increase in the demand for library facilities and the community center.

In accordance with California Government Code Section 53090, development impact fees would be required to offset any additional public service needs. Considering the legislated development fees and close proximity of existing public facilities, impacts would be less than significant.

2.15.3 Mitigation Measures

None required.

2.16 RECREATION

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
(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 checked="" type="checkbox"/>	<input type="checkbox"/>

2.16.1 Impact Analysis

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Please refer to Section 2.15, Public Services, for further information and analysis related to recreational facilities. Impacts would be less than significant.

2.16.2 Mitigation Measures

None required.

2.17 TRAFFIC AND CIRCULATION

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Would the project conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Substantially increase hazards due to a geometric 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"/>
(d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2.17.1 Environmental Evaluation

The *Final Traffic Impact Study for the Dry Creek Commons Project* was prepared for the project by W-Trans. The following analysis incorporates the findings of this report which has been included as **Appendix I** to this Initial Study

2.17.2 Environmental Setting

2.17.2.1 PROJECT SITE

The project site would be accessed from a single driveway on Dry Creek Road located at the southeastern edge of the project site, approximately 370 feet east of Grove Street and adjacent to the SMART railroad tracks. Along the project frontage, Dry Creek Road is nearly 50 feet wide and includes one through lane in the westbound direction, two through lanes in the eastbound direction, and a center turn lane. At the project driveway location, there is a raised median on Dry Creek Road that is part of a signalized pedestrian crossing system for the Foss Creek Pathway.

Dry Creek Road is an east–west arterial that connects ramps at U.S. 101 to Healdsburg Avenue to the east and Dry Creek Valley to the west. Dry Creek Road has a speed limit of 30 miles per hour and carries approximately 15,200 vehicles per day. The roadway has continuous sidewalks along the south side east of Grove Street, but sidewalks are missing along the project frontage on the north side of the street.

2.17.2.2 TRANSPORTATION SETTING

Transportation operating conditions during the a.m. and p.m. peak hours were evaluated under Existing, Existing plus Project, Cumulative, and Cumulative plus Project conditions. Conditions under these peak periods were evaluated to capture the highest potential impacts for the proposed project as well as the highest volumes on the local transportation network. The morning peak hour occurs between 7:00 and 9:00 a.m. and reflects conditions during the home to work or school commute, while the p.m. peak hour occurs between 4:00 and 6:00 p.m. and typically reflects the highest level of congestion during the homeward bound commute.

The four roadway intersections selected for analysis included:

1. U.S. 101 South Ramps/Dry Creek Road, a four-legged all-way stop-controlled intersection; the south leg serves as the U.S. 101 South on-ramp.
2. U.S. 101 North Ramps/Dry Creek Road, a four-legged two-way stop-controlled intersection with stop controls on the northbound off-ramp approach. Because the north leg is a U.S. 101 North on-ramp, there is no southbound approach at this intersection.
3. Grove Street/Dry Creek Road, a four-legged signalized intersection with a protected left-turn phasing on the eastbound and westbound approaches. While Grove Street currently operates with permitted left-turn phasing, plans have been completed to convert operation to split phasing; the left-turn phasing on Dry Creek Road would be simultaneously converted to protected/permitted, with flashing yellow arrows during the “permitted” portion of the operation. Marked crosswalks with pedestrian phasing are available on all legs of the intersection.
4. Healdsburg Avenue/Dry Creek Road-March Avenue, a four-legged signalized intersection with protected left- turn phasing on all approaches. There are marked crosswalks with pedestrian phasing on all legs of the intersection.

Existing Conditions

The Existing Conditions scenario provides an evaluation of current operations based on existing traffic volumes during the a.m. and p.m. peak periods.

Under existing conditions, all four study intersections operate acceptably at LOS D or better. The northbound U.S. 101 North off-ramp approach to Dry Creek Road also operates acceptably at LOS C or D (see **Table 11: Existing Peak Hour Intersection Levels of Service**).

Table 11: Existing Peak Hour Intersection Levels of Service

Study Intersection	AM Peak		PM Peak	
	Delay	LOS	Delay	LOS
1. U.S. 101 South Ramps/Dry Creek Road	16.6	C	23.2	C
2. U.S. 101 North Ramps/Dry Creek Road	14.1	B	6.4	A
<i>Northbound (U.S. 101 Off-Ramp) Approach</i>	33.4	D	21.4	C
3. Grove Street/Dry Creek Road	33.4	D	30.3	C

4.	Healdsburg Avenue/Dry Creek Road-March Avenue	29.0	C	51.1	D
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Source: *Final Traffic Impact Study for the Dry Creek Commons Project*, April 2022 (see **Appendix I**)

Notes: Delay is measured in average seconds per vehicle; LOS= Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*.

Planned Facilities and Future Conditions

Based on the U.S. 101/Dry Creek Road Interchange Feasibility Study and subsequent review by the Healdsburg City Council,⁷⁹ roundabouts are the preferred option for making planned future improvements to the two ramp intersections at the U.S. 101/Dry Creek Road interchange. Further, the existing traffic signal at Grove Street/Dry Creek Road is planned to be modified as follows:

- Modify the northbound approach to include left-turn and shared through/right-turn lanes.
- Install split phasing for the northbound and southbound Grove Street approaches.
- Implement flashing yellow arrow (permissive/protected) left-turn phasing for the eastbound and westbound Dry Creek Road approaches.

Under the anticipated future volumes for the 2040 horizon year obtained from Sonoma County’s gravity demand model, and with completion of planned improvements described above, study intersections are expected to operate acceptably at LOS D or better (see **Table 12: Future Peak Hour Intersection Levels of Service**).

⁷⁹ City of Healdsburg, 2020. *US 101/Dry Creek Road Interchange Feasibility Study Report*. Available at: <https://healdsburg.gov/DocumentCenter/View/12616/US101-Dry-Creek-Interchange---Feasibility-Report-DRAFT--March-2020>. Accessed May 2022.

Table 12: Future Peak Hour Intersection Levels of Service

Study Intersection	AM Peak		PM Peak	
	Delay	LOS	Delay	LOS
1. U.S. 101 South Ramps/Dry Creek Road	13.7	B	26.2	C
2. U.S. 101 North Ramps/Dry Creek Road	6.8	A	10.1	B
3. Grove Street/Dry Creek Road	51.1	D	31.2	C
4. Healdsburg Avenue/Dry Creek Road-March Avenue	13.7	B	30.0	C

Source: *Final Traffic Impact Study for the Dry Creek Commons Project*, April 2022 (see **Appendix I**)

Notes: Delay is measured in average seconds per vehicle; LOS= Level of Service

2.17.2.3 EXISTING AND PLANNED PEDESTRIAN FACILITIES

Pedestrian facilities include sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extensions, and various streetscape amenities such as lighting and benches. In general, a network of sidewalks, crosswalks, pedestrian signals, and curb ramps provide access for pedestrians in the vicinity of the project site; however, a gap in the sidewalk network exists along the project’s Dry Creek Road frontage. Existing gaps and obstacles along the connecting roadways impact convenient and continuous access for pedestrians and present safety concerns in those locations where appropriate pedestrian infrastructure would address potential conflict points. These existing gaps and obstacles are as follows:

- **Dry Creek Road:** Continuous sidewalk coverage and overhead streetlighting is provided on one or both sides of Dry Creek Road between Grove Street and Healdsburg Avenue, with a gap in the existing facilities along the project frontage. The segment between Grove Street and U.S. 101 does not have sidewalks, except for the south side of the street between U.S. 101 North Ramps and Grove Street. Crosswalks with pedestrian phasing are available at the Foss Creek Pathway crossing as well as at the nearby signalized intersections, including Dry Creek Road/Grove Street and Healdsburg Avenue/Dry Creek Road-March Avenue.
- **Grove Street:** Sidewalks exist on both sides of Grove Street along the frontages of developed properties north of the Carson Warner Skatepark, but coverage is intermittent south of the skate park. Sidewalks are provided on both sides for most of the segment between Chiquita Road and Grove Court. There is minimal lighting south of Dry Creek Road besides pedestrian-scale lighting between Old Rossi Place and overhead streetlights at the roundabout at Grove Street/Farmstand Road.
- **Healdsburg Avenue:** Continuous sidewalk coverage is provided on both sides of Healdsburg Avenue except for a small segment on the west side of Healdsburg Avenue near Sunnyvale Drive. Overhead streetlighting is provided on both sides of Healdsburg Avenue.
- **Foss Creek Pathway:** The City recently completed an extension of the Foss Creek Pathway between Grove Street and the prior terminus south of Dry Creek Road, including a signalized crossing of Dry Creek Road adjacent to the project site. The Pathway currently extends south to Front Street where it is planned to connect across the Russian River along the SMART railroad alignment.

Pedestrian facilities are planned to be added near the project site, including the planned expansion of Foss Creek Pathway, benches and shade structures along the Foss Creek Pathway, and citywide ADA upgrades and warning and wayfinding signage.⁸⁰

⁸⁰ Sonoma County Transportation Authority. 2019. Countywide Bicycle and Pedestrian Master Plan Updated Project List. Available online: <https://scta.ca.gov/planning/countywide-active-transportation-plan/#updated-project-list-2019>. Accessed June 2022.

2.17.2.4 EXISTING AND PLANNED BICYCLE FACILITIES

The Caltrans Highway Design Manual classifies bikeways into four categories:

- Class I Multi-Use Path: a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.
- Class II Bike Lane: a striped and signed lane for one-way bike travel on a street or highway.
- Class III Bike Route: signing only for shared use with motor vehicles within the same travel lane on a street or highway.
- Class IV Bikeway: a separated bikeway for the exclusive use of bicycles that includes a separation between the bikeway and the motor vehicle traffic lane. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

Existing facilities in the project area include the Class I Foss Creek Pathway, Class II bike lanes on much of Grove Street and March Avenue east of Healdsburg Avenue, and Class III bicycle routes on Dry Creek Road and Healdsburg Avenue. Class III bicycle routes are proposed on Dry Creek Road from the City limits to Grove Street and on Grove Street south of Dry Creek Road. Class II bike lanes are proposed on Dry Creek Road west of the City limits and Grove Street north of Dry Creek Road.⁸¹ The Class I Foss Creek Pathway is planned to extend to the northern City limits. Bicyclists ride in the roadway and/or on sidewalks along all other streets within the project area.

2.17.2.5 EXISTING AND PLANNED TRANSIT FACILITIES

SCT provides fixed-route bus service in Healdsburg. SCT Route 67 provides north and south loop service Mondays through Saturdays from 9:06 a.m. to 3:11 p.m. to destinations throughout Healdsburg and stops on March Avenue across the street from Ace Hardware and on Grove Street south of Dry Creek Road. SCT Route 60 provides daily regional service between Healdsburg and surrounding communities such as Cloverdale to the north and Santa Rosa to the south from 7:15 a.m. to 9:20 p.m., depending on travel direction of travel. There are bus stops in both directions on Healdsburg Avenue near Dry Creek Road as well as near Terrace Boulevard. The SCT routes operate with headways of between 1 to 1.5 hours.

Two or three bicycles can be carried on most SCT buses. Bike rack space is on a first-come, first-served basis. Riders are responsible for both loading and unloading their bicycles.

Dial-a-ride, also known as paratransit, or door-to-door service, is available for those who are unable to independently use the transit system due to a physical or mental disability. SCT Paratransit is designed to serve the needs of individuals with disabilities.

The SMART rail line runs adjacent to the project site and service is proposed to be extended to the City, though there is currently no planned completion date for the extension. Upon completion of the SMART rail extension, access to regional transit service would improve.

⁸¹ Sonoma County Transportation Authority. 2019. Countywide Bicycle and Pedestrian Master Plan Updated Project List. Available online: <https://scta.ca.gov/planning/countywide-active-transportation-plan/#updated-project-list-2019>. Accessed June 2022.

2.17.3 Impact Analysis

a. *Would the project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

Trip Generation

The project would generate an average of 263 trips per weekday, including 21 a.m. peak hour trips and 23 p.m. peak hour trips. These new trips represent the increase in traffic associated with the project compared to existing volumes.

Existing Plus Project Conditions

Upon the addition of project-related traffic to existing traffic volumes, the study intersections would continue to operate acceptably at the same LOS with minor increases to the delay (see **Table 13: Existing and Existing plus Project Peak Hour Intersection Levels of Service**).

Table 13: Existing and Existing plus Project Peak Hour Intersection Levels of Service

Study Intersection	Existing Conditions				Existing plus Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. U.S. 101 S Ramps/Dry Creek Road	16.6	C	23.2	C	17.4	C	24.0	C
2. U.S. 101 N Ramps/Dry Creek Road	14.1	B	6.4	A	14.3	B	6.6	A
<i>Northbound (U.S. 101 Off-ramp) Approach</i>	<i>33.4</i>	<i>D</i>	<i>21.4</i>	<i>C</i>	<i>34.1</i>	<i>D</i>	<i>21.8</i>	<i>C</i>
3. Grove Street/Dry Creek Road	29.0	C	16.1	C	29.0	C	16.2	B
4. Healdsburg Avenue/Dry Creek Road-March Avenue	38.7	D	16.6	B	38.7	D	16.6	B

Source: *Final Traffic Impact Study for the Dry Creek Commons Project*, April 2022 (see **Appendix I**)

Notes: Delay is measured in average seconds per vehicle; LOS= Level of Service; Results for minor approaches to two-way stop-controlled intersections are indicated in *italics*.

Future Plus Project Conditions

Upon the addition of project-generated traffic to the anticipated future volumes, and with the planned improvements, the study intersections would operate acceptably at LOS D or better (see **Table 14: Future and Future plus Project Peak Hour Intersection Levels of Service**).

Table 14: Future and Future plus Project Peak Hour Intersection Levels of Service

Study Intersection	Future Conditions				Future plus Project			
	AM Peak		PM Peak		AM Peak		PM Peak	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. U.S. 101 South Ramps/Dry Creek Road	13.7	B	26.2	C	14.0	B	26.7	C
2. U.S. 101 North Ramps/Dry Creek Road	6.8	A	10.1	B	7.0	A	10.2	B
3. Grove Street/Dry Creek Road	30.3	C	31.2	C	30.3	C	31.6	C
4. Healdsburg Avenue/Dry Creek Road-March Avenue	51.1	D	30.0	C	51.1	D	30.0	C

Source: *Final Traffic Impact Study for the Dry Creek Commons Project*, April 2022 (see **Appendix I**)

Notes: Delay is measured in average seconds per vehicle; LOS= Level of Service

The project would contribute vehicular trips to the intersections of U.S. 101 South Ramps/Dry Creek Road and U.S. 101 North Ramps/Dry Creek Road, where the roundabouts are planned to be installed. These planned future improvements were incorporated into the City's Traffic Facilities Impact Fees per Resolution 2-2021, so payment of the fee would be expected to offset any cumulative effect on traffic operation associated with the project. Therefore, with the payment of the City's Traffic Facilities Impact Fees, the project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness of the circulation system and impacts would be less than significant.

Pedestrian Facilities

Given the proximity of nearby commercial and recreational destinations surrounding the project site residents, visitors, and employees may walk, bicycle, and/or use transit for trips from and to the project site. The project would include the construction of a sidewalk along the project's Dry Creek Road frontage, connecting to the existing sidewalk to the east and the Foss Creek Pathway that runs along the SMART railroad tracks east of the project site and to the existing sidewalk to the west at Plank Coffee near Grove Street.

The project frontage would be oriented toward Dry Creek Road and placed moderately close to the back of the sidewalk. The project's landscape design would use plantings to define the edge of the sidewalk; incorporate pedestrian paths, outdoor places, landscaping, and lighting; and highlight building entries. Pedestrian facilities serving the project site would be adequate upon completion of improvements proposed as part of the project. The project would be expected to have a less-than-significant impact regarding adequacy of pedestrian facilities and compliance with policies related to pedestrian facilities. Impacts to pedestrian facilities would be less than significant.

Bicycle Facilities

Existing bicycle facilities, including the Foss Creek Pathway and bike lanes on Grove Street, March Avenue and Healdsburg Avenue, together with shared use of minor streets, provide adequate access for bicyclists.

Based on Municipal Code Section 20.16.175, Bicycle Parking, lockable bicycle parking is required for multifamily residential projects of 10 or more units, though the number of required bicycle spaces is not specified. Bicycle parking would be provided outdoors at the project site entrance (10 spaces) and indoors inside a secure bicycle room in Building 1 (50 spaces). The bicycle parking room would be centrally located within the project site to encourage bicycling. Bicycle facilities serving the project site are adequate. The project would be expected to have a less-than-significant impact regarding adequacy of bicycle facilities and compliance with policies related to bicycle facilities. Impacts to bicycle facilities would be less than significant.

Transit Facilities

Existing bus stops for SCT Routes 60 and 67 are located approximately 400 feet west of the project site near Grove Street and on March Avenue/Dry Creek Road, approximately 700 feet east of the project site. These bus stops are within a reasonable walking distance of the project site. Transit load factors would be spread out across SCT Routes 60 and 67 and the various route headways as described above. Therefore, the project-generated transit trips would have a dispersed effect on local transit service. Existing transit routes are adequate to accommodate project-generated transit trips and access to regional transit would be improved upon completion of the SMART extension to the City with connections via existing SCT routes and also via the Foss Creek Pathway.

The project would be expected to have a less-than-significant impact regarding adequacy of transit facilities and compliance with policies related to transit. Impacts to transit facilities would be less than significant.

Summary

The proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness related to transportation and the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, the project would have less-than-significant impacts to the circulation system.

b. Would the project conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)?

SB 743 established a change in the metric to be applied in determining transportation impacts associated with development projects. As of the date of this analysis, the City has not yet adopted thresholds of significance related to vehicle miles traveled (VMT). As a result, project-related VMT impacts were assessed based on guidance published by the California Governor's Office of Planning and Research (OPR) in the publication Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory (2018). The Technical Advisory notes that "a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less-than-significant impact on VMT. Evidence supports a presumption of less-than-significant impact for a 100 percent affordable residential development (or the residential component of a mixed-use development) in infill locations." As the project is an infill 100 percent affordable housing development, the screening guidance provided by the OPR would apply, and it is reasonable to conclude that the project would have a less-than-significant impact on VMT.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Site Access

Site access would be from Dry Creek Road via a driveway located at the southeast corner of the project site. The project driveway would be aligned with the driveway for Hotel Trio on the south side of Dry Creek Road; however, given the proximity of the proposed driveway to the recently installed Foss Creek Pathway crossing and, in particular, the median island that is part of that crossing, the project would prohibit left turns from the project driveway and include on-street striping and signage indicating right-turn out movements only. Left turns would be prohibited because drivers exiting the project site would not be able to enter the center turn lane but would need to cross through it. As a result, left turns could result in vehicles stopping across the center lane and extending into the through lane, blocking traffic and creating a potentially unsafe situation. Under future conditions, with the planned extension of service on the SMART rail line through Healdsburg north to Cloverdale, a "Quiet Zone" would be implemented through the City. As part of the implementation of the Quiet Zone improvements, the median island that is part of the Foss Creek Pathway crossing would be extended and would completely block access to the project driveway, resulting in right-turn access only both inbound and outbound.

In order to prevent potential conflicts associated with outbound left turns the project has been designed to prohibit outbound left turns; only outbound right turns would be allowed from the project driveway. Thus, no conflicts are anticipated between vehicles exiting the project site and vehicles traveling on Dry Creek Road, including vehicles entering and exiting the Hotel Trio driveway on the south side of Dry Creek

Road. Therefore, the project would not substantially increase hazards due to a geometric design feature or incompatible uses.

Sight Distance

Sight distance along Dry Creek Road at the project driveway was evaluated based on sight distance criteria contained in the Caltrans Highway Design Manual. The recommended sight distances for minor street approaches that are a driveway are based on stopping sight distance, with the approach travel speeds used as the basis for determining the recommended sight distance. Additionally, the stopping sight distance needed for a following driver to stop if there is a vehicle waiting to turn into a side street or driveway is evaluated based on stopping sight distance criteria and the approach speed on the major street.

For the 30 mile per hour speed limit on Dry Creek Road, a minimum of 200 feet of stopping sight distance is needed. Based on the review of field conditions, sight lines to and from the project driveway on Dry Creek Road are measured to be nearly 720 feet to the west, which would be more than adequate for the posted speed limit. Sight lines to the east were not measured as left turns from the project driveway would be prohibited as part of the project design to avoid potential conflicts associated with the existing median island and Foss Creek Pathway crossing, as described above. Adequate stopping sight distance is available on Dry Creek Road for a following driver to notice and react to a preceding motorist slowing to enter the project site at the project driveway.

Consistent with Article I, Yard Requirements, and Article VI, Landscaping and Screening, of Municipal Code Chapter 20.16, General Development Standards, all signs and landscaping at the project driveway and Dry Creek Road frontage would be designed and maintained to preserve adequate sight lines for vehicles. Therefore, the project would have less-than-significant impacts related to traffic hazards associated with sight lines and stopping sight distance.

Geometric Design Considerations

As part of the project, Dry Creek Road would be widened to provide a second westbound travel lane, closing an existing gap as the second westbound travel lane currently exists to the east and west of the project site. To ensure safe operation upon completion of the project, the project would restripe Dry Creek Road and include new signage to eliminate the existing roadway merge to the east and convert the dedicated right-turn lane at Grove Street to a shared through/right-turn lane. The project would also restripe and install signage at the westbound approach to the Grove Street/Dry Creek Road intersection to allow U-turns.

Summary

Implementation of the project design as proposed, including the right-in, right-out turn restriction at the project driveway; road widening to add a second westbound through lane to Dry Creek Road; associated striping improvements to Dry Creek Road; and associated striping improvements to the Grove Street/Dry Creek Road intersection to accommodate U-turns, would ensure that impacts related to hazards due to a geometric design feature would be less than significant.

d. Would the project result in inadequate emergency access?

The project site circulation and access design would meet City design criteria, including the 20-foot minimum width for project driveway. Additionally, a vehicular connection on the eastern side of the project site to the parcel north of the project site would provide emergency ingress and egress. All internal drive aisles would be subject to California Fire Code requirements, including provisions associated with

minimum width. As designed, the project site access and on-site circulation would function acceptably for emergency response vehicles and the project would not substantially increase emergency response times. As such, adequate emergency access would be provided, and impacts would be less than significant.

2.17.4 Mitigation Measures

None required.

2.18 TRIBAL CULTURAL RESOURCES

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
(a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(i) Listed in 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2.18.1 Environmental Evaluation

The *Cultural Resources Study for the Dry Creek Commons Project* was prepared for the project by Tom Origer and Associates. The following analysis incorporates the findings of this report, which has been included as **Appendix D** to this Initial Study.

2.18.2 Environmental Setting

Cultural resources are generally defined in the California Public Resources Code (PRC) Section 21074 as either a site, feature, place, or 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.

2.18.3 Impact Analysis

- a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i. Listed in 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)?**

As described above in Section 2.5, Cultural Resources, the *Cultural Resources Study* prepared for the project did not identify resources on-site that were listed or eligible for listing. Therefore, the project would have less-than-significant impacts on a tribal cultural resource that is listed in or eligible for listing in the California Register, or in a local register of historical resources as defined in PRC Section 5020.1(k).

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

All formal outreach to Native American parties and follow-up consultation is being conducted by the City's Planning Division, pursuant to PRC Section 21080.3.1, as amended by the provisions of AB 52. A records search request for the project was made to the California Native American Heritage Commission (NAHC) on November 3, 2021, with the intent of identifying sensitive areas and obtaining a list of Native American tribes and/or individuals who may have specific knowledge of the vicinity (see **Appendix D**). The NAHC responded on December 8, 2021, indicating results of the Sacred Lands File search were positive, and provided a list of Native American tribes and individuals who may also have knowledge of cultural resources in the project's archaeological APE. The City sent formal consultation letters to all provided Native American contacts on February 11, 2022. Informal consultation emails to Native American contacts were also sent on November 3, 2021.

The Federated Indians of Graton Rancheria responded to the informal consultation email via email on November 4, 2021, stating that the project's archaeological APE is outside of their area of interest. The Kashia Band of Pomo Indians of the Stewarts Point Rancheria responded via email on November 17, 2021, stating that the project's archaeological APE is within the territory of the Dry Creek Band of Pomo, and they defer comments to them. No other responses have been received as of the date of this Initial Study.

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of project construction, construction activities would temporarily cease on the project site, as set forth in **Mitigation Measure TRI-1**, until the potential tribal cultural resources are properly assessed pursuant to PRC Section 21074 (a)(2). Implementation of **Mitigation Measure TRI-1** and **Mitigation Measure CUL-1 (Accidental Discovery)** would reduce impacts related to encountering previously unidentified tribal resources to a less-than-significant level. Compliance with these mitigation measures would ensure the project does not cause a substantial adverse change in the significance of a tribal cultural resource, and this potentially significant impact would be reduced to a less-than-significant level.

2.18.4 Mitigation Measure

TRI-1 In the event that tribal cultural resources are encountered during the course of the project construction, all such activities within 100 feet of the find shall temporarily cease on the project site until a qualified archaeologist can evaluate whether the resource requires further study to ensure that the potential tribal cultural resources are properly assessed and treated pursuant to Public Resources Code Section 21074(a)(2).

2.19 UTILITIES AND SERVICE SYSTEMS

Environmental Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
(a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2.19.1 Environmental Setting

The Utilities Department, which includes the Electric, Water and Wastewater Divisions, is responsible for the delivery of water, electricity, and treatment of wastewater within the City. Responsibilities include maintenance, operation and improvement of the electrical distribution system, the water system (including production, treatment, storage and distribution), and the wastewater system (including collection, pumping and treatment of sewage). The Public Works Department is responsible for engineering review and the development and maintenance of the City's infrastructure, including design and construction of the water, sewer and storm drain systems.

2.19.1.1 WASTEWATER

The City operates and maintains a network of 50.2 miles of collection system gravity main piping, 3 miles of force mains, and 11 lift stations.⁸² The lift stations include the Magnolia Lift Station and 10 smaller satellite lift stations. The Magnolia Lift Station has a capacity of approximately 8.6 million gallons per day (gpd) and experiences maximum daily flows of about 0.9 million gpd.⁸³ The northern area of the City, including the project site, is served by the North Trunk Sewer. The Magnolia Trunk Sewer collects all wastewater within the City near the south end of Healdsburg Avenue, directing flows south to the Magnolia Lift Station where it is pumped to the City's wastewater treatment plant (WWTP). The City is currently replacing the two sections of 14-inch-diameter force main pipe that runs under Dry Creek Road and installing three new 16-inch-diameter force main pipes.⁸⁴

The City operates a tertiary-level WWTP, which treats all of the City's wastewater to Title 22 recycled water standards. The WWTP is located on Foreman Lane, approximately one mile southwest of the City limits just south of the confluence of Dry Creek and the Russian River. The WWTP is located within the Region 1 (North Coast) boundaries of the RWQCB and is designed to accommodate an annual average daily flow of 1.6 million gallons per day (mgd) and maximum sustained peak flows of 4.0 mgd.⁸⁵ The WWTP operates under Order No. R1-2016-0015 (NPDES Permit No. CA0025135) and has a permitted dry-weather capacity of 1.4 mgd and peak daily wet weather flow of 4.0 mgd.⁸⁶ The equalization basins and wet-weather treatment capacity (4.0 mgd) together are sized to accommodate a storm event producing wet weather flows of up to 9.3 mgd.⁸⁷ Buildout under the 2030 General Plan is anticipated to generate an estimated wastewater flow of 0.364 mgd.⁸⁸

2.19.1.2 WATER

The City's water distribution system serves a population of roughly 11,800 through 4,532 water meters and includes the residents of Healdsburg and the Fitch Mountain Water District.⁸⁹ The City's Utility Department pulls water from both the Russian River and Dry Creek through well fields. This diversion of water is allowed through four water-rights: three on the Russian River and one on Dry Creek. In addition, the City has one application pending with the State Water Resources Control Board (SWRCB) for additional water rights on Dry Creek. The City also contracts with Sonoma Water for a backup supply of water should the City's water rights become unavailable.

⁸² City of Healdsburg. 2020. *Sewer System Management Plan*, pp. 3-4 and Appendix 4-3. Available at: <https://ci.healdsburg.ca.us/DocumentCenter/View/11888/FINAL-SSMP-Update-2020>. Accessed May 2022.

⁸³ City of Healdsburg. 2014. *Healdsburg Housing Element: 2015-2023*, p. 100. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/5437/Adopted-Housing-Element>. Accessed May 2022.

⁸⁴ City of Healdsburg. 2020. *Sewer System Management Plan*, pp. 3-4 and Appendix 10.1. Available at: <https://ci.healdsburg.ca.us/DocumentCenter/View/11888/FINAL-SSMP-Update-2020>. Accessed May 2022.

⁸⁵ City of Healdsburg. 2008. *Membrane Wastewater Treatment Facility*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/1039/New-State-of-the-Art-Facility-PDF?bidId=>. Accessed May 2022.

⁸⁶ City of Healdsburg. 2020. *Sewer System Management Plan*, Appendix 10.1. Available at: <https://ci.healdsburg.ca.us/DocumentCenter/View/11888/FINAL-SSMP-Update-2020>. Accessed May 2022.

⁸⁷ City of Healdsburg. 2009. *2030 General Plan Update Revised Draft Environmental Impact Report: Utilities*, p. IV.P-2. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/672/Utilities-PDF>. Accessed May 2022.

⁸⁸ City of Healdsburg. 2014. *Healdsburg Housing Element: 2015-2023*, p. 101. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/5437/Adopted-Housing-Element>. Accessed May 2022.

⁸⁹ City of Healdsburg. 2021. *2020 Urban Water Management Plan Update*, p. 7. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/13549/2020-Urban-Water-Management-Plan---Final?bidId=>. Accessed May 2022.

The City's drinking water system includes the operation of thirteen water production wells, their water treatment systems and equipment at each of three well fields, the water treatment plant, a single raw water reservoir and seven treated water storage reservoirs, five booster pump stations, and eight pressure reducing stations. The principal water mains in the distribution system range in size from 4 to 16 inches in diameter. Most of the distribution piping in the older areas of the City range in size from 1-1/2 to 4 inches, while the newer areas are served by pipes 6 to 16 inches in diameter.

The City's Urban Water Management Plan (UWMP) estimated the City's total demand for water in 2020 at 661 million gallons (mg), including 640 mg of retail water demand and 21 mg of wholesale water demand. The City's actual retail water supply in 2020 was 1,826 mg. The City's total water demand (potable and non-potable) is projected to increase to 981 mg in 2045, 940 mg of which would be from retail customers.⁹⁰ The City's total retail water supply is projected to increase to 2,355mg in 2045.

In 2020, the City had the rights to 1,826 acre-feet per year (afy) of retail water supplies with an additional 1,306 afy assuming the acquisition of pending water rights. As shown in Table 6-11a of the UWMP, the City projects the reasonably available retail water supply in 2045 to be 2,355 mg.⁹¹

2.19.1.3 ELECTRICITY AND NATURAL GAS

The City owns and operates its own electrical distribution system. The City's Electric Department is responsible for the operation and maintenance associated with the reliable distribution of electricity to residential and commercial customers, except for the Grove Street neighborhood and the Fitch Mountain area, which are served by Pacific Gas and Electric Company (PG&E). The City acquires wholesale-priced power through the Northern California Power Agency (NCPA). The City's electrical system is linked to its power sources through an interconnection with the PG&E 60,000-volt transmission line at the City's Badger Electric Substation, located approximately 1.5 miles from the project site. Two main electrical feeder lines extend from the substation south along First Street and south to the industrial area along Healdsburg Avenue. The substation does not operate at full capacity. Two additional electrical feeder lines extend northerly to the main part of the City through Tayman Park Golf Course.⁹²

2.19.2 Impact Analysis

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

Wastewater

The project would include the extension of wastewater collection infrastructure from Dry Creek Road to serve Building 1 and Building 2.

⁹⁰ City of Healdsburg. 2021. *2020 Urban Water Management Plan Update*, p. 25. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/13549/2020-Urban-Water-Management-Plan---Final?bidId=> . Accessed May 2022.

⁹¹ City of Healdsburg. 2021. *2020 Urban Water Management Plan Update*, p. 25. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/13549/2020-Urban-Water-Management-Plan---Final?bidId=> . Accessed May 2022.

⁹² City of Healdsburg. 2014. *Healdsburg Housing Element: 2015-2023*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/5437/Adopted-Housing-Element>. Accessed May 2022.

The Magnolia Lift Station and the WWTP both have capacity to serve the project. The Magnolia Lift Station has a capacity of approximately 8.6 million gpd and experiences maximum daily flows of approximately 0.9 million gpd. Therefore, the system has the hydraulic capacity to accommodate the peak wet weather flows as well as additional flows, including those generated by the project.

The WWTP has a permitted dry weather capacity of 1.4 mgd. Taking the highest average dry weather flow (ADWF) between 2000 and 2008 (0.98 mgd) as the base year, the unused capacity available to accommodate development and growth under 2030 General Plan buildout is a minimum of 0.42 mgd.^{93,94} Buildout under the 2030 General Plan, which considered development of the project site, is anticipated to generate an estimated wastewater flow of 0.364 mgd. The total resulting flow of 1.34 mgd at buildout would leave an unused capacity of 0.06 mgd. Therefore, there is adequate wastewater treatment capacity to accommodate the increased demand associated with the project.

The 2030 General Plan Update EIR did not find a significant impact due to anticipated developments in relation to wastewater facilities. This project falls under the type of buildout planned for in the 2030 General Plan, as it is consistent with the land use and zoning requirements. No new or expanded wastewater treatment facilities or expansion of existing facilities would be needed to serve the wastewater generated from 58 residential units and approximately 146 new residents. Therefore, impacts would be less than significant.

Water

The project would include the extension of water distribution infrastructure from Dry Creek Road to serve Building 1 and Building 2.

Buildout of the 2030 General Plan, which includes development of the project site, is planned to increase the City's population to 14,468; less than the population of 14,900 projected for 2025 by the 2003 Water System Master Plan and the 2005 UWMP.⁹⁵ The City's combined projected water supplies are sufficient to meet projected demands during normal water supply conditions over the next 25 years. However, during single-dry year and multiple-dry year conditions, when the City's water supplies are constrained by low flows within the Russian River and Dry Creek, the City would have insufficient water supply to meet demand without implementing conservation measures. Under a worst-case condition (single dry year) the level of needed mandatory conservation could reach 50 percent. In 2014 the City updated Municipal Code Chapter 13.12, Water System, to include Article IV, the Water Shortage Emergency Plan for the City.⁹⁶ In accordance with the 2020 UWMP, this ordinance will be amended to include further water shortage scenarios.

The 2030 General Plan Update EIR did not find a significant impact due to anticipated developments in relation to the availability of water supplies. Buildout of the 2030 General Plan included development of the project site consistent with land use and zoning requirements including the increase that could occur in association with the development of affordable housing. No new or expanded entitlements would be needed to serve the annual water demand from 58 residential units and approximately 146 new residents and expansion of existing facilities would not be necessary. Therefore, there is adequate water supply to

⁹³ City of Healdsburg. 2014. *Healdsburg Housing Element: 2015-2023*, p.100. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/5437/Adopted-Housing-Element>. Accessed May 2022.

⁹⁴ City of Healdsburg. 2009. *2030 General Plan Update Revised Draft Environmental Impact Report: Utilities*, pp. IV.P-8 - IV.P-9. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/672/Utilities-PDF>. Accessed May 2022.

⁹⁵ City of Healdsburg. 2014. *Healdsburg Housing Element: 2015-2023*, p. 102. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/5437/Adopted-Housing-Element>. Accessed May 2022.

⁹⁶ City of Healdsburg. 2014. "ORDINANCE NO. 1134." Available at: <https://ci.healdsburg.ca.us/DocumentCenter/View/988/Water-Conservation-Ordinance-1134-PDF>. Accessed May 2022

accommodate the increased demand associated with additional residential development during the Housing Element planning period (i.e., 2015–2023), including the project. Project impacts would be less than significant.

Electricity and Natural Gas

The project would underground the existing overhead electrical lines along the Dry Creek Road frontage. The project would also include all-electric buildings with solar panels to generate electricity on-site and would not use natural gas.

The 2030 General Plan anticipated energy demand in the City could grow by 15 to 20 percent in the next few years, primarily because of growth in the northern area of the City, including the project site.⁹⁷ The Badger Electric Substation is currently operating at about one-half of its capacity and would adequately serve the needs of the project. Additionally, sufficient electric power is available to serve future development through purchase power contracts with the NCPA, possible future additional NCPA generation projects, conservation and load management programs, small self-generation projects, and purchase power contracts through private qualifying facilities. The 2030 General Plan Update EIR did not find a significant impact due to anticipated developments in relation to electricity and natural gas. Buildout of the 2030 General Plan included development of the project site consistent with land use and zoning requirements. No new or expanded electricity or natural gas sources or expansion of existing facilities would be needed to serve the annual energy demand from 58 residential units and approximately 146 new residents. Therefore, project impacts would be less than significant.

Stormwater

Please refer to Section 2.10, Hydrology and Water Quality, for further information and analysis related to stormwater facilities. Impacts would be less than significant.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Please refer to analysis under Impact Question (a), above. Impacts would be less than significant.

c. Would the project 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?

Please refer to analysis under Impact Question (a), above. Impacts would be less than significant.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Please refer to analysis under Impact Question (e). Impacts would be less than significant.

⁹⁷ City of Healdsburg. 2014. *Healdsburg Housing Element: 2015-2023*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/5437/Adopted-Housing-Element>. Accessed May 2022.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The 2030 General Plan Update EIR states that residential uses would generate approximately 11.4 pounds of solid waste per dwelling unit per day.⁹⁸ Using this ratio, the project would generate approximately 661.2 pounds of solid waste daily (0.33 ton) or approximately 87.4 tons annually.

The City has an exclusive franchise agreement with Recology Sonoma Marin to provide solid waste, recycling and compost service to residents and businesses.⁹⁹ Solid waste from the City is transferred first to the North County Transfer Station and then transported to landfill sites located outside Sonoma County. Landfills outside of Sonoma County include Redwood Sanitary Landfill near Novato, Potrero Hills Sanitary Landfill near Suisun City, and Altamont Landfill near Livermore. Collectively, these disposal facilities have more than 100 million cubic yards of remaining capacity, which is more than enough to accommodate the solid waste potentially produced by the project. Therefore, impacts to landfills would be less than significant.

Section 4.408.1 of the 2019 CALGreen requires all residential projects to recycle and/or salvage for reuse a minimum of 65 percent of nonhazardous construction and demolition waste as a condition of approval on all building and/or demolition permits. To demonstrate compliance, the project would submit a Construction Waste Management Plan to the City’s Community Development Department.¹⁰⁰

The project would be required to comply with all federal, state, and local ordinances for water, energy, and waste reduction and management. The project would be served with curbside solid waste, recycling, and green waste collection service, which are standard services for residential uses in the City. Solid waste disposal must follow the requirements of the contracted waste hauler and receiving landfill. These waste haulers must follow federal, state, and local regulations related to the collection and disposal of solid waste. The project would comply with all construction and operational regulations regarding waste diversion and recycling. Given the project characteristics, no further recycling or waste reduction requirements would be applicable therefore project impacts would be less than significant.

2.19.3 Mitigation Measures

None required.

2.20 WILDFIRE

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>				
(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

⁹⁸ City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Utilities*. Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/672/Utilities-PDE>. Accessed May 2022.

⁹⁹ City of Healdsburg. 2022. “Solid Waste Services.” Available at: <https://www.ci.healdsburg.ca.us/875/Solid-Waste>. Accessed May 2022.

¹⁰⁰ City of Healdsburg Planning and Building Department. 2022. “Construction Waste Management Plan (CWMP).” Available at: <https://www.ci.healdsburg.ca.us/DocumentCenter/View/12333/Construction-Waste-Management-Plan>. Accessed May 2022.

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
(b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

2.20.1 Impact Analysis

a. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The project site is surrounded by industrial and commercial uses and is not within a Very High Fire Hazard Severity Zone (FHSZ) in a State Responsibility Area or Local Responsibility Area.¹⁰¹ As shown on General Plan Figure IV.H-1, Wildland High Fire Hazard Zone, the eastern portion of the City includes hazard zones with moderate to high wildland fire susceptibility due to steepness and vegetative cover.¹⁰² These zones are more than 1 mile north and east of the project site. Access to Dry Creek Road and the design of the project driveway would comply with City standards including HFD requirements for emergency access. In compliance with Municipal Code Section 12.12.150, Maintaining Traffic, at least 72 hours in advance written notification of any construction-related lane closures or detours would be given to emergency service providers. Therefore, construction and operation of the project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and no impacts would occur.

b. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Please refer to analysis under Impact Question (d), below. No impact would occur.

¹⁰¹ California Department of Forestry and Fire Protection (CAL FIRE). 2008. *Very High Fire Severity Zones in Local Responsibility Areas: Sonoma County*. Available at: https://osfm.fire.ca.gov/media/6820/fhszl_map49.pdf. Accessed May 2022.

¹⁰² City of Healdsburg. 2009. *Healdsburg 2030 General Plan Update Revised Draft Environmental Impact Report: Figure IV.H 1*. Available at: <https://ci.healdsburg.ca.us/DocumentCenter/View/713/IVH-1-Wildland-High-Fire-Hazard-Zone-PDF>. Accessed May 2022.

c. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Please refer to analysis under Impact Question (d), below. No impact would occur.

d. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

The project site is located in an urban area surrounded by commercial and industrial development and infrastructure. As noted above, the project site is not within a mapped Very High, High, or Moderate FHSZ pursuant to CAL FIRE and the 2030 General Plan. The project would add three fire hydrants throughout the project site and underground the existing overhead electrical utility lines along the Dry Creek frontage. Given the project’s location outside of a FHSZ, the project would not expose project occupants to pollutant concentrations from wildfire hazards, would not require the installation or maintenance of any other new infrastructure, and would not expose people or structures to significant risks as a result of post-fire instability including downslope or downstream flooding or landslides. Therefore, the project would not expose people or structures to significant risks associated with wildland fires and no impact would occur.

2.20.2 Mitigation Measures

None required.

2.21 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
(a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

2.21.1 Impact Analysis

- 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?**

The project site is located on the western edge of the City, directly adjacent to Foss Creek and its riparian corridor. The project site is surrounded by commercial and industrial land uses to the north, east, west, and south. Three vegetation communities, comprising four wildlife habitat types, occur within the project site. **Mitigation Measure BIO-1** through **Mitigation Measure BIO-3** would be implemented to protect plants and wildlife in the area, and **Mitigation Measures BIO-2** through **Mitigation Measure BIO-5** would be implemented to protect sensitive species, wetlands, and nesting birds; therefore, the project would have a less-than-significant impact on biological resources.

The SMART (formerly Northwestern Pacific Railroad) railroad tracks are east of the project site and were determined eligible for the National Register, but the project would not affect this resource. While not anticipated, if archaeological resources and human remains are found during project construction the project would have a less-than-significant impact with implementation of **Mitigation Measures CUL-1** and **Mitigation Measure CUL-2**. As described in this Initial Study, the project would not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts from the project would be less than significant with mitigation incorporated.

- 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.)**

The project would have less-than significant impacts to aesthetics, air quality, biology, cultural resources, energy, geology and soils, GHGs, hydrology and water quality, noise, traffic, and tribal cultural resources. Cumulative impacts are assessed as follows:

- **Aesthetics.** Temporary construction impacts to the visual character would be limited to the public view from Dry Creek Road. Construction impacts would be short-term and temporary, lasting approximately 12 to 18 months, and would be limited to the presence of construction vehicles, equipment, and staging on the project site. Because of the intervening landscaping and limited duration of project construction, the project would not cause impacts to aesthetics that would be cumulatively considerable.
- **Air Quality and GHG.** According to the BAAQMD’s CEQA Guidelines, if a project’s emissions levels exceed the identified significance thresholds for air quality and GHGs, the emissions would be cumulatively considerable. Construction and operational emissions for the project would not exceed BAAQMD thresholds of significance. Therefore, construction and operations-related air quality and GHG impacts associated with the project would not be cumulatively considerable.
- **Biological Resources.** The project could have potentially significant impacts to sensitive species, wetlands, roosting bats, and nesting birds. However, a qualified biologist would conduct pre-construction surveys and **Mitigation Measure BIO-1** through **Mitigation Measure BIO-4**

identified for impacts to biological resources would fully mitigate all potentially significant biological impacts from construction to a less-than-significant level. Therefore, the project would not cause impacts to biological resources that would be cumulatively considerable.

- **Cultural and Tribal Cultural Resources.** There is no indication of any significant tribal or cultural resources located within the project site. **Mitigation Measures CUL-1, CUL-2, and TRI-1** would require the cessation of project construction activities following the discovery of any previously unidentified cultural resources, human remains, or tribal cultural resources. The potential impacts remaining after cessation of project construction activities would be negligible and would not contribute to an incremental impact. Therefore, the project would not cause impacts that would be cumulatively considerable.
- **Energy.** There are no established thresholds of significance for construction-related energy use. Cumulative impacts on energy resources would occur if the project would add to a substantial aggregation of impacts related to wasteful, inefficient, or unnecessary energy consumption or conflict with a state or local plan for renewable energy or efficiency. Projects in the County are required to comply with the BAAQMD and the California Green Buildings Standard to reduce construction-related GHG emissions which also reduces energy use. In addition, all projects in the County are required to comply with the County Waste Management Plan by recycling at least 65 percent of all construction waste or demolition material. Therefore, the project would not cause impacts to energy use that would be cumulatively considerable.
- **Geology and Soils.** As described in Section 2.7, Geology and Soils, the project is located in a seismically active area. **Mitigation Measure GEO-1** would require the recommendations in the *Geotechnical Study Report* to be incorporated into project design to ensure the project is designed to resist seismic hazards. In addition, there is no indication of any paleontological resources located in the project area; however, **Mitigation Measure GEO-2** would require the cessation of construction activities following the discovery of any previously unidentified paleontological resource. The potential impacts remaining after cessation of project activities would be negligible and would not contribute to an incremental impact. Therefore, the project would not cause impacts to geology and soils that would be cumulatively considerable.
- **Hydrology and Water Quality.** Project construction could cause runoff to adjacent ditches and Foss Creek that could violate water quality standards and result in erosion or siltation. However, compliance with the SWPPP BMPs, which is a standard condition of approval, would prevent contaminated stormwater runoff from entering adjacent drainages during both construction and operation. Therefore, the project would not contribute to cumulative water quality impacts in Foss Creek, adjacent drainages, or wetlands.
- **Transportation.** The project proposes modifications to Dry Creek Road that would temporarily redirect traffic during project construction; notification of any lane closures or detours would be given to emergency service providers at least 72 hours in advance. The project would contribute vehicular trips to the intersections of U.S. 101 South Ramps/Dry Creek Road and U.S. 101 North Ramps/Dry Creek Road, where future improvements are planned. The project would pay the City's Traffic Facilities Impact Fees per Resolution 2-2021, which would be expected to offset any cumulative effect on traffic operations associated with the project. The project would incorporate improvements to Dry Creek Road and to the Grove Street/Dry Creek Road intersection to increase the safety of the project. Therefore, the project would not cause impacts to transportation that would be cumulatively considerable. Impacts of construction will be short-term and temporary, lasting approximately 12 to 18 months. Given the small size of the project, its limited duration, and mitigation measures to reduce all potential impacts, the effects of the project would not contribute to a cumulatively considerable impact.

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

A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the previous sections. The project would construct affordable housing, and as described throughout this Initial Study, with required adherence to local, regional, and state regulations and implementation of mitigation measures (where applicable), the project would not result in any significant impacts. Therefore, the project would not have the potential to result in substantial adverse effects on human beings, and impacts would be less than significant with mitigation incorporated.

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