



Santero Way Specific Plan Update

Final Environmental Impact Report
State Clearinghouse #2023100654

prepared by

City of Cotati Community Development Department

201 West Sierra Avenue

Cotati, California 94931

Contact: Noah Housh, Director

prepared with the assistance of

Rincon Consultants, Inc.

4825 J Street, Suite 200

Sacramento, California 95819

December 2024



RINCON CONSULTANTS, INC. SINCE 1994

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1 Introduction

1.1 Final EIR Contents

This Final Environmental Impact Report (EIR) has been prepared by the City of Cotati Community Development Department to evaluate the potential environmental impacts of the proposed Cotati Santero Way Specific Plan Update Project (“proposed project” or “project”).

As prescribed by the California Environmental Quality Act (CEQA) *Guidelines* Sections 15088 and 15132, the lead agency (the City) is required to evaluate comments on environmental issues received from persons who have reviewed the Draft EIR and to prepare written responses to those comments. This document, together with the Draft EIR (incorporated by reference) comprise the Final EIR for this project. This Final EIR includes individual responses to each letter received during the public review period for the Draft EIR. In accordance with CEQA *Guidelines* Section 15088(c), the written responses describe the disposition of significant environmental issues raised.

The City has provided a good faith effort to respond to all significant environmental issues raised by the comments. The Final EIR also includes amendments to the Draft EIR consisting of changes suggested by certain comments, as well as minor clarifications, corrections, or revisions to the Draft EIR. The Final EIR includes the following contents:

- Section 1: Introduction
- Section 2: Responses to Comments on the Draft EIR, which also includes a list of all commenters and public comment letters
- Section 3: Revisions to the Draft EIR
- Section 4: Mitigation Monitoring and Reporting Program

1.2 Notice of Preparation and Project Scoping

The City of Cotati distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on October 23, 2023, and ending on November 22, 2023. A Revised NOP describing changes to the project boundary to include the TOC parcels was circulated between July 19, 2024, and August 20, 2024. In addition, the City held an EIR Scoping Meeting on November 6, 2023, and on August 4, 2024. The meetings were aimed at providing information about the proposed project to members of public agencies, interested stakeholders and residents/community members. The meetings were held at Cotati City Hall at 201 West Sierra Avenue. The City received letters from one agency and four members of the public in response to the NOP during the public review period, as well as various verbal comments during the EIR Scoping Meetings. These comments were addressed in the Draft EIR (refer to Table 1-1, beginning on page 1-2 of the Draft EIR).

The City published a Notice of Availability (NOA) on November 1, 2024, and filed a notice of completion (NOC) with the State Clearinghouse to begin the 45-day public review period (Public Resources Code [PRC] Section 21161). The local review period began on November 1, 2024, and ended on December 16, 2024, and the state review period began on November 4, 2024, and ended on December 18, 2024. The Draft EIR was made available on the County’s website (<https://www.cotaticity.org/1535/Santero-Way-Specific-Plan-Update>). The NOA was published in

the Community Voice (a local newspaper), filed with the Sonoma County Clerk, and emailed to individuals who requested written notifications related to the project. As a result of these notification efforts, written comments on the content of the Draft EIR were received from one agency. Section 2, *Responses to Comments on the Draft EIR*, identifies these commenting parties, their respective comments, and responses to these comments. None of the comments received, or the responses provided, constitute “significant new information” by CEQA standards (CEQA Guidelines Section 15088.5).

1.3 EIR Certification Process and Project Approval

Before adopting the proposed project, the lead agency is required to certify that the EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the lead agency.

Upon certification of an EIR, the lead agency makes a decision on the project analyzed in the EIR. A lead agency may: (a) disapprove a project because of its significant environmental effects; (b) require changes to a project to reduce or avoid significant environmental effects; or (c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (CEQA Guidelines Sections 15042 and 15043).

In approving a project, for each significant impact of the project identified in the EIR, the lead or responsible agency must find, based on substantial evidence, that either: (a) the project has been changed to avoid or substantially reduce the magnitude of the impact; (b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or (c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (CEQA Guidelines Section 15091). Per PRC Section 21061.1, “feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account, economic, environmental, legal, social, and technological factors.

If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision and explains why the project's benefits outweigh the significant environmental effects (CEQA Guidelines Section 15093).

When an agency makes findings on significant effects identified in the EIR, it must adopt a program for reporting on or monitoring the changes that were adopted or made conditions of project approval to mitigate significant effects (CEQA Guidelines Section 15091[d]).

1.4 Draft EIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when comments on the Draft EIR or responses thereto identify “significant new information.” Significant new information is defined as including:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The comments, responses, and Draft EIR revisions presented in this document do not constitute such "significant new information;" instead, they clarify, amplify, or make insignificant modifications to the Draft EIR. For example, none of the comments, responses, and Draft EIR amendments disclose new or substantially more severe significant environmental effects of the proposed project, or new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft EIR that would clearly lessen the proposed project's significant effects.

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2 Responses to Comments on the Draft EIR

This section includes comments received during public circulation of the Draft Environmental Impact Report (EIR) prepared for the Santero Way Specific Plan Update Project (proposed project).

The Draft EIR was circulated for a 45-day public review period that began on November 1, 2024 and ended on December 18, 2024. The City of Cotati Community Development Department received one comment letter on the Draft EIR. The commenters and the page number on which each commenter’s letter appears are listed below.

Letter No. and Commenter	Page No.
1 Yunsheng Luo, Branch Chief, Caltrans District 4	2-2

The comment letters and responses follow. The comment letters are numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in Comment Letter 1).

Where a comment resulted in a change to the Draft EIR text, a notation is made in the response indicating that the text is revised. Changes in text are signified by ~~strikeout font~~ where text was removed and by underlined font where text was added. These changes in text are also included in Section 3, *Revisions to the Draft EIR*.

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



December 18, 2024

SCH #: 2023100654
GTS #: 04-SON-2024-00956
GTS ID: 33444
Co/Rt/Pm: SON/101/12.698

Noah Housh, Director
City of Cotati
201 W. Sierra Avenue
Cotati, CA 94931

Re: Santero Way Specific Plan Update – Draft Environmental Impact Report (DEIR)

Dear Noah Housh:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Santero Way Specific Plan Update. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the November 2024 DEIR.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project would update land use designations for a residentially focused transit-oriented neighborhood within walking distance to the Cotati Sonoma-Marin Area Rail Transit (SMART) Station that allows for mixed-use and neighborhood-serving retail development, community-serving uses, and transit-serving uses. Anticipated plan changes include potential expansion of the plan boundary to add one or more parcels up to 4 acres; potential rezoning of up to nine parcels up to 15 acres outside the Plan Area, but within 0.5 miles of the Cotati SMART Station; and development standards and design guidelines to ensure compatibility with existing land uses and project objectives. Rezoning is anticipated on up to 23 parcels to allow between 25-35 dwelling units per acre, and a floor area ratio (FAR) of at least 1.0 for commercial development.

1.1

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

1.1
cont.

The project VMT analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the DEIR, this project is found to have a less than significant VMT impact, given that the entirety of the project area is within 0.5 of an existing major transit station.

Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

1.2

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Equity and Public Engagement

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the City to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

Caltrans encourages the City to foster meaningful, equitable and ongoing public engagement in the Specific Plan development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.

1.3

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Melissa Hernandez, Associate Transportation Planner via LDR-D4@dot.ca.gov.

For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Noah Housh, Director
December 18, 2024
Page 3

Sincerely,

A handwritten signature in black ink, appearing to read "Luo Yunsheng". The signature is fluid and cursive, with the first name "Luo" being more prominent and the last name "Yunsheng" written in a more connected, flowing style.

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

Letter 1

COMMENTER: Yunsheng Luo, Branch Chief, Caltrans District 4

DATE: December 18, 2024

Response 1.1

The commenter summarizes the project and vehicle miles traveled analysis provided in the Draft EIR. The commenter states that the vehicle miles traveled analysis and significance determination are consistent with the Office of Planning and Research's Technical Advisory.

This comment is noted. No further response is required.

Response 1.2

The commenter states that oversized or excessive load vehicles on State roadways are required to obtain transportation permits issued by Caltrans. The commenter states that coordination with Caltrans prior to construction to reduce construction traffic impacts may be required.

This comment is noted. No construction is proposed at this time, and future construction facilitated by the project would be required to adhere to all rules and regulations related to transportation along State roadways.

Response 1.3

The commenter emphasizes the importance of equity and public engagement and indicates a desire to work with the City to provide benefits to underserved communities. The commenter encourages public engagement during the Specific Plan development process.

This comment is noted. This comment does not pertain to the analysis provided in the Draft EIR and no further response is warranted. A summary of the community engagement and outreach conducted during development of the Specific Plan to date can be found on the City's website: <https://www.cotaticity.gov/1535/Santero-Way-Specific-Plan-Update>.

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3 Revisions to the Draft EIR

This chapter presents specific text changes made to the Draft EIR since its publication and public review. The changes are presented in the order in which they appear in the original Draft EIR and are identified by the Draft EIR page number. Text deletions are shown in ~~strike through~~, and text additions are shown in underline. The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute “significant new information” requiring recirculation (see Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5).

3.1 Revisions to the Draft EIR

No revisions to the Draft EIR have been made.

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4 Mitigation Monitoring and Reporting Program

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Environmental Impact Report (EIR), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

Table 4-1 Mitigation Monitoring and Reporting Program

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Biological Resources							
BIO-1. Nesting Bird Survey							
<p>If construction is scheduled to occur during the nesting bird season (February 1 through August 31), the project applicant shall retain a qualified biologist to conduct a pre-construction nesting bird survey no more than 14 days prior to the start of construction to determine the presence/absence of nesting birds and raptors within the project sites and adjacent areas. The survey shall include the entire site plus a 100-foot buffer, as accessible. If active nests are found, the qualified biologist shall establish an appropriate avoidance buffer, considering the species sensitivity and physical location of the nest (line of site to the work area), to comply with CFGC 3503 and 3503.5. In no case shall the buffer be smaller than 50 feet for non-raptor bird species and 250 feet for raptor species. To prevent encroachment, the established buffer(s) shall be clearly marked by high visibility material installed by the contractor. The established buffer(s) shall remain in effect until the young have fledged or the nest has been abandoned as confirmed by the qualified biologist. The City shall review and approve the biologists' findings and buffer during construction as appropriate.</p>	<p>Require the project applicant to retain a qualified biologist to conduct a pre-construction nesting bird survey conducted no more than 14 days prior to the start of construction, if construction occurs between February 1 and August 31, and establish appropriate buffers until the young have fledged the nest.</p>	<p>No more than 14 days prior to construction start</p>	<p>Once and as needed</p>	<p>City of Cotati</p>			
	<p>Review and approve the biologist's findings and buffer.</p>	<p>Prior to construction start</p>	<p>Once and as needed</p>				

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
Cultural Resources							
CUL-1a. Identification of Historical Resources							
<p>A historical resources evaluation shall be prepared for projects carried out within the project area involving the demolition or physical alteration of a building, structure, object, or other built environment feature that is 45 years of age or older, that has not been subject to evaluation as part of this study, as outlined in Table 4-2. The evaluation shall be prepared by a qualified architectural historian or historian who meets the Secretary of the Interior’s Professional Qualifications Standards (PQS) in architectural history or history to conduct a historical resources evaluation and submit to the City for review for projects located on parcels listed in Table 4-2.</p> <p>Review the prepared report and confirm that the final report has been submitted to the Northwest Information Center.</p>	<p>Require the project applicant to retain a qualified architectural historian or historian who meets the Secretary of the Interior’s Professional Qualifications Standards (PQS) in architectural history or history to conduct a historical resources evaluation and submit to the City for review for projects located on parcels listed in Table 4-2.</p>	<p>Prior to construction on parcels listed in Table 4-2</p>	<p>Once</p>	<p>City of Cotati</p>			
			<p>Prior to construction</p>	<p>Once</p>			

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Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
CUL-1b. Treatment of Historical Resources							
<p>If a project would occur on a site containing a historical resource as identified during implementation of Mitigation Measure CUL-1a, impacts must be mitigated, to the extent feasible, to historical resources identified within a proposed development site. Application of mitigation shall be overseen by an architectural historian, historian, and/or historic architect meeting the PQS, unless unnecessary in the circumstances (e.g., avoidance). Mitigation may include avoidance, or preservation, rehabilitation, restoration, or reconstruction of the resource consistent with the Secretary of the Interior’s Standards for the Treatments of Historic Properties (Standards). In accordance with CEQA, a project that has been determined to conform with the Standards generally would not cause a significant adverse direct or indirect impact to historical resources (14 CCR Section 15126.4[b][1]). A report identifying and specifying the project description, treatment of character-defining features, and compliance with the Standards must be submitted to the City for review and approval prior to the issuance of permits.</p> <p>If historical resources are identified on a development site and compliance with the Standards and/or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken as determined by a PQS historian, architectural historian, and/or historic architect and the City. Mitigation measures may include, but are not limited to, Historic American Building Survey (HABS)-Like report, interpretive signage, and</p>	<p>If a project occurs on a site containing a historical resource as determined by Mitigation Measure CUL-1a and avoidance is not an option, require the project applicant to retain an architectural historian, historian, and/or historic architect meeting to oversee the necessary mitigation.</p>	Prior to project approval	As needed	City of Cotati			
	<p>Review and approve the completed report identifying and specifying the project description, treatment of character-defining features, and compliance with the Standards must be submitted to the City.</p>	Prior to issuance of permits for demolition or alternative of a historic resource	As needed				

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
relocation. The mitigation shall be completed and submitted to the City prior to issuance of permits for demolition or alteration of the historical resource.							
CUL-2a. Archaeological Resources Assessment							
<p>For future projects involving ground disturbance either on parcels not previously studied (as outlined in Table 4-3), on parcels previously studied but the <i>Santero Way Specific Plan Update Project Cultural Resources Technical Report</i> (Rincon Consultants, Inc. 2024) is more than five years old, and/or if conditions on the project parcel has changed substantially, the project applicant(s) shall prepare a Phase I archaeological resources assessment under the supervision of an archaeologist meeting the PQS in archaeology (National Park Service 1983). Assessments must include a California Historical Resources Information System (CHRIS) records search at the Northwest Information Center at Sonoma State University, Sacred Lands File search maintained by the Native American Heritage Commission, and intensive-level pedestrian survey, and archaeological sensitivity analysis. The assessment must be completed prior to project approval.</p> <p>If the Phase I archaeological resources assessment identifies resources that may be affected by the project, an extended Phase I testing program, Phase II testing and evaluation, and/or archaeological monitoring may be required, as determined by the qualified archaeologist. If resources are determined significant or unique, avoidance or preservation-in-place may reduce impacts to a less than significant level. If avoidance is not possible, appropriate site-specific mitigation measures</p>	<p>If a parcel listed in Table 4-3 has not been previously studied, the previous study is more than five years old, or conditions on the parcel have changed substantially,, require the applicant to retain an archaeologist meeting the PQS in archaeology to conduct a Phase I archaeological resources assessment.</p>	Prior to project approval	As needed	City of Cotati			
	<p>Review and approve the completed report(s) and confirm implementation of identified mitigation measures.</p>	Prior to project approval	As needed	City of Cotati			

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Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
shall be identified. These measures may include, but would not be limited to, a Phase III data recovery program and curations, or other appropriate actions to be determined by a qualified archaeologist and City. The City will review and approve reports and ensure that mitigation measures are implemented as appropriate prior to or during construction.							
CUL-2b. Unanticipated Discoveries							
In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities, work within 50 feet of the find shall halt and an archaeologist meeting the PQS for archaeology shall be contacted immediately to evaluate the resource. If the resource is determined by the PQS archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the PQS archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a PQS archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the California Code of Regulations (CCR) Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover	Require in the construction contract that work shall stop within 50 feet of an archaeological resource.	Prior to grading permit approval	Once	City of Cotati			
	Require the project applicant to retain an archaeologist meeting the PQS for archaeology to evaluate the resource.	During construction, if an archaeological resource is discovered	As needed				
	If the resource is prehistoric, contact a Native American representative to participate in evaluation of the resource.	During construction, if a prehistoric archaeological resource is discovered	As needed				
	If avoidance of an eligible resource is not feasible, review and approve a data recovery and treatment plan prepared by the archaeologist and Native American representative.	During construction, if an eligible resource cannot be avoided	As needed				

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Section 15126.4(b)(3)(C).							
Geology and Soils							
GEO-9a. Unanticipated Discovery of Paleontological Resources							
The City shall require the following mitigation measure for all projects involving ground disturbance of sediments that may have high paleontological sensitivity (i.e., sediments greater than 5 feet below the surface) in order to mitigate potential impacts to unanticipated paleontological resources discovered during project construction:	Require in the construction contract that work shall stop within 50 feet of a paleontological resource.	Prior to construction	Once	City of Cotati			
<ul style="list-style-type: none"> The project applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If a potential fossil is discovered during project construction, construction activity within 50 feet of the find shall cease until the discovery is examined by a Qualified Professional Paleontologist as defined by the Society of Vertebrate Paleontology (SVP; 2010). If the find is determined to be scientifically significant, the Qualified Professional Paleontologist shall direct all mitigation measures related to paleontological resources consistent with the SVP (2010) standards, which shall include fossil salvage, laboratory preparation, curation in a paleontological 	Require project applicants to retain a Qualified Professional Paleontologist as defined by the SVP to evaluate the find, direct necessary mitigation measures, and monitor construction activities if a paleontological find is discovered.	During construction,	As needed				

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<p>repository, and a paleontological monitoring report. Additionally, the Qualified Professional Paleontologist and City shall decide if full- or part-time monitoring shall be instated for further project-related excavations. A Qualified Professional Paleontologist, is defined by the SVP (2010) as an individual with:</p> <ul style="list-style-type: none"> ▫ A graduate degree in paleontology or geology, and/or a publication record in peer reviewed journals; and demonstrated competence in field techniques, preparation, identification, curation, and reporting in the state or geologic province in which the project occurs. An advanced degree is less important than demonstrated competence and regional experience. ▫ At least two full years professional experience as assistant to a Project Paleontologist with administration and project management experience; supported by a list of projects and referral contacts. ▫ Proficiency in recognizing fossils in the field and determining their significance. ▫ Expertise in local geology, stratigraphy, and biostratigraphy. ▫ Experience collecting vertebrate fossils in the field. 							
GEO-9b. Paleontological Resources Mitigation During Construction							
For projects that could disturb previously undisturbed sediments greater than 5 feet below the surface, the project applicant shall:	Require the project applicant to retain a qualified paleontologist to conduct a paleontological Worker Environmental Awareness program training for construction personnel, construction	Prior to construction of projects involving ground disturbance greater than 5 feet	Once	City of Cotati			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
<ul style="list-style-type: none"> ▪ Retain a Qualified Professional Paleontologist. The Qualified Professional Paleontologist shall determine the applicable following mitigation measures depending on the volume of the proposed ground disturbance, nature of the proposed ground disturbance, development history of the project site, and/or other criteria. The Qualified Professional Paleontologist shall oversee the implementation of these mitigation measures which may include some, all, or none of the following: <ul style="list-style-type: none"> ▫ Paleontological Worker Environmental Awareness Program. Prior to the start of construction, a Qualified Professional Paleontologist, as defined by the Society of Vertebrate Paleontology (SVP; 2010), or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction personnel. The WEAP shall discuss the potential to discover paleontological resources in the project site, legal obligations to protect paleontological resources, examples of paleontological resources that may be found in the project site, procedures in case a paleontological resource is discovered, and contact information for the Qualified Professional Paleontologist. ▫ Paleontological Monitoring. Paleontological monitoring shall be 	<p>monitoring, evaluate paleontological finds, and prepare reports for projects involving ground disturbance greater than 5 feet below ground surface.</p> <p>Require in the construction contract that work shall stop within 50 feet of a paleontological resource.</p> <p>Review paleontological final report(s) and ensure the project applicant complies with recommendations from the report.</p>	<p>below ground surface</p> <p>Prior to construction</p> <p>During construction</p>	<p>Once</p> <p>Once</p>				

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Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
	<p>conducted by a paleontological monitor with experience with collection and salvage of paleontological resources and who meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor, meaning an individual with:</p> <ul style="list-style-type: none"> – BS or BA degree in geology or paleontology and one year experience monitoring in the state or geologic province of the specific project. An associate degree and/or demonstrated experience showing ability to recognize fossils in a biostratigraphic context and recover vertebrate fossils in the field may be substituted for a degree. An undergraduate degree in geology or paleontology is preferable, but is less important than documented experience performing paleontological monitoring, or – AS or AA in geology, paleontology, or biology and demonstrated two years’ experience collecting and salvaging fossil materials in the state or geologic province of the specific project, or – Enrollment in upper division classes pursuing a degree in the fields of geology or paleontology and two years of monitoring experience in the state or geologic province of the specific project. <p>▫ Monitors must demonstrate proficiency in recognizing various types of fossils, in</p>						

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
<p>collection methods, and in other paleontological field techniques.</p> <p>The Qualified Professional Paleontologist has the authority to determine the duration, frequency, and specific locations, of paleontological monitoring, which may change during project construction based on geological observations made during monitoring.</p> <ul style="list-style-type: none"> ▫ Paleontological Resource Discovery Protocols. In the event of a fossil discovery by the paleontological monitor or construction personnel, all construction activity within 50 feet of the find shall cease until the discovery can be evaluated by the Qualified Professional Paleontologist. If a fossil is not scientifically significant, then construction activity may resume. If it is determined that a fossil is potentially scientifically significant, the following shall be completed: <ul style="list-style-type: none"> – The paleontological monitor shall salvage (excavate and recover) the fossil to protect it from damage/destruction. Typically, fossils can be safely salvaged quickly by a single paleontological monitor with minimal disruption to construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrate fossils. After a fossil 							

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
<p>is salvaged, construction activity may resume.</p> <ul style="list-style-type: none"> – Fossils shall be identified to the lowest (most-specific) possible taxonomic level, prepared to a curation-ready condition, and accessioned to a paleontological repository, defined by the SVP (2010) as a “not-for-profit museum or university approved by the lead agency and employing a permanent curator responsible for paleontological records and specimens,” alongside all metadata (e.g., maps, coordinates, stratigraphic/geologic data, etc.) required by the paleontological repository. ▫ Paleontological Monitoring Report. This measure shall be required if paleontological monitoring occurred or significant paleontological resources were discovered. Upon completion of ground-disturbing activities (or laboratory preparation and curation of fossils, if necessary), the Qualified Professional Paleontologist shall prepare a report describing the results of the paleontological monitoring efforts. The report shall include a summary of field and laboratory methods employed; an overview of project geology; and, if fossils were discovered, an analysis of the fossils, including physical description, taxonomic identification, and scientific significance. The report shall be submitted to the City and, if 							

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fossil curation occurred, the paleontological repository.							
Greenhouse Gas Emissions							
GHG-1. Consistency with BAAQMD’s Project-Level GHG Threshold							
The following shall be a condition of approval for future developments facilitated by the project: Greenhouse Gas Emissions Reductions. Development under the Specific Plan and on the TOC parcels shall not include natural gas appliances or natural gas plumbing. EV Charging. Development under the Specific Plan and on the TOC parcels shall achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.	Include the greenhouse gas emission reduction measures as conditions of approval for future development within the Specific Plan Area and on the TOC parcels.	Prior to building permit approval	Once	City of Cotati			
Hazards and Hazardous Materials							
HAZ-6. Traffic Control Plan							
A Traffic Control Plan (TCP) shall be developed prior to issuance of grading permits and implemented by the project applicant and/or their construction contractor(s) during construction of the proposed project. The TCP shall include but not be limited to: <ul style="list-style-type: none">The TCP shall identify construction staging site locations and potential road closures, alternate routes for detours, and planned truck routes for construction-related vehicle traffic, including but not limited to haul trucks, material delivery trucks, and equipment delivery trucks. It shall also identify alternative safe routes and policies to maintain safety along bicycle and pedestrian routes during construction. Construction traffic routes shall avoid local	Require the project applicant to submit and implement a TCP. Review and approve the TCP. Confirm implementation of the TCP.	Prior to issuance of grading permits During construction	Once As needed	City of Cotati Public Works and Engineering Department			

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<p>residential streets to the maximum extent practicable. Staging locations, alternate detour routes, and construction traffic routes shall avoid other active construction projects within 0.25 mile of the project construction site to the maximum extent practicable.</p> <ul style="list-style-type: none"> ▪ The TCP shall provide for traffic control measures including flag persons, warning signs, lights, barricades, cones, and/or detour routes to provide safe passage of vehicular, bicycle, and pedestrian traffic and access by emergency responders. ▪ Prior to the start of construction, written notice shall be provided regarding potential land and/or road closures as described in the plan. Notice shall be delivered to potentially affected properties within a 500-foot radius of the construction site. The notice shall contain a brief description of the work, work dates, and contact information of the City of Cotati Community Development Department. The notice shall be delivered ten calendar days prior to beginning the work and again at two working days prior to beginning the work. A revised notice shall be delivered in the event of delays in schedule as soon as reasonably practicable after a delay is identified and the revised schedule is known. <p>The TCP shall be submitted to the City of Cotati Public Works and Engineering Department for review and approval prior to the issuance of a grading permit. The City of Cotati shall also ensure the plan is reviewed by emergency services personnel to ensure adequate emergency access is maintained throughout the</p>							

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
construction period. The City shall confirm implementation of the plan during construction as part of routine site inspections.							
Noise							
N-1a. Construction-Related Noise Reduction Measures							
Similar to Action N 1h in the Cotati General Plan (City of Cotati 2015), the City shall require, as a standard condition of approval, that project applicants apply the following measures during construction of individual development projects within the project area.	Require project applicants to include noise mitigation measures in their construction contracts as a standard condition of approval.	Prior to grading permit approval	Once	City of Cotati			
<ul style="list-style-type: none"> ▪ Mufflers. Construction equipment shall be properly maintained and all internal combustion engine driven machinery with intake and exhaust mufflers and engine shrouds, as applicable, shall be in good condition and appropriate for the equipment. During construction, all equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers, consistent with manufacturers' standards. ▪ Electrical Power. Electrical power, rather than diesel equipment, shall be used to run compressors and similar power tools and to power any temporary structures, such as construction trailers or caretaker facilities. ▪ Stationary Equipment. All stationary equipment shall be staged as far away from the adjacent sensitive receptors as feasible. ▪ Equipment Idling. Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use. 	Confirm implementation of noise reduction measures.	During construction	As needed				

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
<ul style="list-style-type: none"> ▪ Workers’ Radios. All noise from workers’ radios shall be controlled to a point that they are not audible at sensitive receptors near construction activity. ▪ Smart Back-up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction in compliance with applicable safety laws and regulations. ▪ Disturbance Coordinator. The applicant shall designate a disturbance coordinator who shall be responsible for responding to any local complaints about construction noise. The noise disturbance coordinator shall determine the cause of the noise complaint and shall require that reasonable measures warranted to correct the problem be implemented. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site. ▪ Temporary Sound Barriers. Erect temporary noise barriers, where feasible, when construction noise is predicted to exceed the acceptable standards (e.g., 80 dBA L_{eq} at residential receivers, schools or other sensitive receptors during the daytime) and when the anticipated construction duration is greater than is typical (e.g., two years or greater). Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per 							

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
square foot with no gaps from the ground to the top of the barrier. If a sound blanket is used, barriers shall be constructed with solid material with a density of at least 1 pound per square foot with no gaps from the ground to the top of the barrier and be lined on the construction side with acoustical blanket, curtain or equivalent absorptive material rated sound transmission class 32 or higher.							
N-1b. Conduct Stationary Operational Noise Analysis							
The City shall require future development projects that are subject to General Plan Policies N 1.2, N 1.3, and N 1.11 as a condition of approval and to implement any required mitigation measures as recommended by a qualified acoustical consultant to minimize impacts on these uses. Examples of mitigation measures to reduce on-site noise include, but are not limited to, operational restrictions, selection of quiet equipment, equipment setbacks, enclosures, silencers, and/or acoustical louvers.	Retain future development applicants to include specific operational noise mitigation measures as a condition of approval.	Prior to building permit approval	Once	City of Cotati			
N-2. Vibration Control Plan							
Prior to issuance of a building permit for a project in the project area that would require the use of pile driving during construction within 180 feet of fragile structures such as historical resources or within 75 feet of buildings of conventional construction; a vibratory roller within 50 feet of fragile historical resources or 20 feet of buildings of conventional construction; or a dozer or other large earthmoving equipment within 27 feet for a fragile historical structure or 12 feet of buildings of conventional construction, the	Require the project applicant to retain an acoustical consultant or engineer to create a vibration control plan if the development involves pile driving within 180 feet of fragile structures or 75 feet of conventional buildings, a vibratory roller within 50 feet of fragile structures or 20 feet of conventional buildings, or large earthmoving equipment within 27 feet of fragile structures or 12 feet of conventional buildings.	Prior to building permit approval	Once	City of Cotati			

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<p>project applicant shall prepare a vibration analysis to assess and mitigate potential noise and vibration impacts related to these construction activities. This vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The vibration levels shall not exceed the City of Cotati’s vibration criteria for architectural damage thresholds (e.g., 0.08 in/sec PPV for fragile or historical resources and 0.3 in/sec PPV for buildings of conventional construction). If vibration levels would exceed this threshold, alternative uses such as drilling piles as opposed to pile driving, static rollers as opposed to vibratory rollers, and lower horsepower earthmoving equipment shall be used. If alternative methods are not feasible or vibration levels are still predicted to exceed the City’s standards, construction vibration monitoring shall be conducted to ensure vibration thresholds are not exceeded. The study should be submitted to the City prior to permit approval for review and confirmation that the requirements of this measure have been incorporated.</p>	Review the vibration control plan.	Prior to building permit approval	Once				
	Ensure that mitigation measures are implemented.	During construction	As needed				

Tribal Cultural Resources

TCR-1. Suspension of Work Around Tribal Cultural Resources During Construction

<p>In the event that cultural resources of Native American origin are identified during construction of a project, all earth-disturbing work within 50 feet of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City, in</p>	Require in the construction contract that work within 50 feet of discovered tribal cultural resources be temporarily suspended or redirected.	Prior to grading permit approval	Once	City of Cotati			
	Require the project applicant to retain a qualified archaeologist and contact the proper Native American representative to evaluate the resource and create a mitigation plan.	During construction if a tribal cultural resource is discovered	As needed				

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Compliance Verification Comments
<p>consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, the applicant shall prepare and implement a mitigation plan in accordance with State guidelines and in consultation with local Native American group(s). The mitigation plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. The City shall review and approve the mitigation plan prior to implementation.</p>	<p>Confirm implementation of the tribal cultural resource mitigation plan.</p>	<p>During construction</p>	<p>As needed</p>				

Table 4-2 Properties to be Evaluated (Mitigation Measure CUL-1a)

APN	Address	Build Year	Age Eligible	45 Year Threshold	Relationship to Project
144-292-023	640 East Cotati Avenue	2004	No	2049	TOC Parcel
144-292-024	680 East Cotati Avenue	c. 1983-1992+	No	2028	TOC Parcel
144-301-010	905 East Cotati Avenue	1920/1975	Yes	–	TOC Parcel
144-302-022	768 East Cotati Avenue	1954	Yes	–	TOC Parcel
144-302-050	766 East Cotati Avenue	1989	No	2034	TOC Parcel
144-501-004	556 East Cotati Avenue	1973	Yes	–	TOC Parcel
144-570-001	475 East Cotati Avenue	1984	No	2029	TOC Parcel
144-720-029	501 East Cotati Avenue	1945/1956	Yes	–	TOC Parcel
144-720-040	525 East Cotati Avenue	1994	No	2039	TOC Parcel
144-770-021 to 144-770-070	6305-7012 Santero Way	2004	No	2049	SWSP Parcel
144-302-047	930 East Cotati Avenue	1990	No	2035	SWSP Parcel
144-302-049	924 East Cotati Avenue	1994	No	2039	SWSP Parcel
144-480-008	8354 Santero Way	1987	No	2032	SWSP Parcel
144-790-001 to 144-790-016	7046 to 7062 Santero Way	2006	No	2051	SWSP Parcel

Table 4-3 Parcels Not Previously Studied (Mitigation Measure CUL-2a)

APN	Address	Relationship to Project
144-292-023	640 East Cotati Avenue	TOC Parcel
144-292-024	680 East Cotati Avenue	TOC Parcel
144-301-010	905 East Cotati Avenue	TOC Parcel
144-302-022	768 East Cotati Avenue	TOC Parcel
144-302-050	766 East Cotati Avenue	TOC Parcel
144-501-004	556 East Cotati Avenue	TOC Parcel
144-570-001	475 East Cotati Avenue	TOC Parcel
144-720-029	501 East Cotati Avenue	TOC Parcel
144-720-040	525 East Cotati Avenue	TOC Parcel
144-770-021 to 144-770-070	6305-7012 Santero Way	SWSP Parcel
144-051-037	None	SWSP Parcel
144-302-047	930 East Cotati Avenue	SWSP Parcel
144-302-049	924 East Cotati Avenue	SWSP Parcel
144-310-007 to 144-310-008	None	SWSP Parcel
144-320-018	None	SWSP Parcel
144-320-026	None	SWSP Parcel
144-320-027	6050 Santero Way – Cotati SMART Station parking lot	SWSP Parcel
144-320-029	None	SWSP Parcel
144-480-008	8354 Santero Way	SWSP Parcel
144-480-015 to 144-480-017	None	SWSP Parcel
144-480-019	None	SWSP Parcel
144-770-071 to 144-770-074	None	SWSP Parcel
144-790-001 to 144-790-016	7046 to 7062 Santero Way	SWSP Parcel
144-790-COM	None	SWSP Parcel