Environmental Assessment
Determinations and Compliance Findings for HUD-assisted Projects
24 CFR Part 58

Project Information

Project Name: Heritage Park ("Project")

Responsible Entity: City of Santa Rosa ("City")

Grant Recipient (if different than Responsible Entity): N/A

State/Local Identifier: N/A

Preparer: Brent Schleck, Senior Environmental Planner

Certifying Officer Name and Title: Clare Hartman, Director of Planning and Economic Development, NEPA Certifying Officer

Consultant (if applicable): Michael Baker International

Direct Comments to: Julie Garen, Housing and Community Services Program Specialist
(707) 543-4339 | jgaren@ssrcity.org

Project Location: 8685 Old Redwood Highway, Windsor CA (APN 164-100-023). The Project site is located on the southwestern corner of the intersection of Old Redwood Highway and Courtyards East in Windsor, California (see Figures 1 and 2), approximately 850 feet southeast of the Old Redwood Highway underpass with U.S. Highway 101. The Project site is designated as Boulevard Mixed Use in the Town of Windsor General Plan and is zoned as Boulevard Commercial. For simplicity, while the trapezoidal Project site is slightly angled off of square, the analysis included in this Environmental Assessment refers to the Project site’s boundary with Old Redwood Highway as the northern Project site boundary. The Project site is surrounded by parcels zoned Boulevard Commercial to the west, north across Old Redwood Highway, and east across Courtyards East. A multi-family residential development zoned Medium Density Residential is located immediately south of the Project site.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]: The Heritage Park Project (Project) would include the construction of a three-story, 33-unit apartment building on a 1.66-acre site and includes 32 affordable units and 1 unrestricted manager’s unit. The proposed apartment units would be affordable to low- and very low-income households and would include 13 three-bedroom units at 1,055 square feet each, 18 two-bedroom units at 955 square feet each,
and 2 one-bedroom units at 720 square feet each. The Project site plan is available as Figure 3. Because the Project would be 100 percent affordable housing, it would receive the following three development concessions under California’s Density Bonus Law (California Government Code Sections 65915-65918):

1. Elimination of required nonresidential components to allow a 100 percent residential Project in the Boulevard Commercial zoning district;
2. Larger front setback than the maximum front setback that is established in the Boulevard Commercial development standards; and
3. Parking space reduction.

Under the California Density Bonus Law, which applies to qualifying affordable housing projects, the minimum number of on-site parking spaces the Town of Windsor could require without using a development concession is 64. Because the Project proposes fewer than 64 spaces, a development concession is required, thus permitting the Project to provide fewer parking spaces. With the parking reduction concession, the Project would provide 54 spaces (38 covered, 9 uncovered, and 7 parallel spaces).

The Boulevard Commercial zoning district requires a maximum front setback of 5 feet but allows up to 20 percent of the façade to be set back 10 feet. This maximum front setback was established with the expectation that ground floor retail uses would be developed at the street. With an all-residential Project, a larger front setback may be preferred for privacy and noise concerns, and therefore the front setback exception was included with the request to eliminate the requirement for a commercial component in the Project. With the setback concession, the building would be set back up to 15 feet.

The Town of Windsor prepared an Initial Study/Mitigated Negative Declaration (IS/MND) in accordance with the California Environmental Quality Act for the Project. The IS/MND did not identify any significant environmental impacts that could not be mitigated to a less-than-significant level. The Town Council adopted the IS/MND on July 28, 2020.

The Project site would be accessed via a driveway on the east side of the Project site to Courtyards East. Additionally, an access road would be developed along the southern edge of the property to accommodate a future street connection planned by the Town of Windsor between Old Redwood Highway and Courtyards East that would pass through the undeveloped property to the west. As shown in Figure 3, this secondary access point would enter the southwest corner of the Project site and would extend along the Project site’s southern boundary, connecting to Courtyards East.

The site currently includes a 1,000-square-foot single-family residence and a small barn structure, which are unoccupied and substantially deteriorated. The residence and barn would be demolished to develop the Project. Additionally, the Project site includes 58 trees of various sizes and species. Of the 58 trees on the site, 46 are oak trees protected by the Town of Windsor’s Tree Preservation and Protection Ordinance. Of these protected oak trees, 25 would be removed as part of the Project and 21 would be preserved in place. A total of 36 protected and non-protected trees would be removed by the Project, with the remaining 22 trees preserved. The proposed Project would comply with all applicable Town of Windsor Tree Preservation and Protection policies and
regulations, including the fencing of trees to be preserved during Project construction and the filing of tree removal permits. In total, the Project would include planting an additional 64 trees throughout the Project site.

To reduce noise levels in outdoor activity areas on the Project site, a sound wall would be constructed on the western boundary of the Project site so that noise levels would not exceed HUD standards. Ambient noise and this proposed sound wall are discussed in the Noise Abatement and Control section of this Environmental Assessment. The efficacy of the sound wall would be confirmed by a qualified acoustical consultant.

**Statement of Purpose and Need for the Proposal** [40 CFR 1508.9(b)]: The purpose of the Project is to provide affordable housing units to low- and very low-income individuals and families in Sonoma County. The Project is needed due to the lack of affordable housing in the State of California and current trends of housing cost burden. Additionally, the Town of Windsor’s 2015-2023 Housing Element identifies several housing-related objectives, policies, and programs. One such objective is the development of new housing. Specifically, the Town of Windsor’s Housing Element includes a quantified objective of 130 very low- and 120 low-income units to be constructed, rehabilitated, or conserved. The proposed Project would satisfy part of that need.

**Existing Conditions and Trends** [24 CFR 58.40(a)]: The Project site is located in southeast Windsor and is relatively flat, with elevations ranging from 115 to 120 feet above mean sea level. The Project site is currently characterized by a single-family residence and a small barn structure with limited landscaping and ornamental plants on the western portion of the site and undeveloped, disked land on the eastern portion of the site. Mature trees of varying size, species, and health are located along the Project site’s northern, western, and southern boundaries. The site currently drains away from Old Redwood Highway.

Surrounding the site are vacant parcels, a commercial building (insurance sales), and the three-story Holiday Inn Windsor hotel to the west. Multi-family residential buildings are located south of the Project site and multi-family and single-family residential buildings are located east, across Courtyards East. North of the Project site, across Old Redwood Highway, there are two restaurant buildings located between 3rd Street and 4th Street, Pueblo Viejo Park at the southwestern corner of the intersection of Franklin Street and 3rd Street, and a single-family residential neighborhood. Pueblo Viejo Park, a 0.3-acre neighborhood park, is approximately 270 feet north of the Project site.

**Funding Information**

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Funding Amount</th>
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<tbody>
<tr>
<td></td>
<td>HUD VASH Project Based Vouchers (City of Santa Rosa)</td>
<td>10 HUD VASH Project Based Vouchers</td>
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**Estimated Total HUD Funded Amount**: 8 Project Based Vouchers from the County of Sonoma, 10 HUD VASH Project Based Vouchers from City of Santa Rosa

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]: $18,530,100
Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determinations</th>
</tr>
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**STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6**

**Airport Hazards**

24 CFR Part 51 Subpart D

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<th>Yes</th>
<th>No</th>
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HUD guidance regarding compliance with 24 CFR 51 D states that additional information is necessary if a project site is within 15,000 feet of a military airport or 2,500 feet of a civilian airport.

The Project site is approximately 50 miles from Travis Air Force Base. The closest commercial airport to the Project site is Sonoma County Airport, located over 2 miles (10,560 feet) to the southwest.

In short, the Project site is greater than 15,000 feet from a military airport and greater than 2,500 feet from a civilian airport. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**Documentation:**


### Coastal Barrier Resources

Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]

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<th>Yes</th>
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The Coastal Barrier Resources Act prohibits federal assistance within barrier islands that are subject to frequent damage by hurricanes and high storm surges. There are no coastal barrier resources identified by the US Fish and Wildlife Service (USFWS) within the State of California. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**Documentation:**


### Flood Insurance


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<th>Yes</th>
<th>No</th>
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Section 202 of the Flood Disaster Protection Act of 1973 (42 USC 4106) requires that projects receiving federal assistance and located in an area identified by FEMA as being within a Special Flood Hazard Areas (SFHA) be covered by flood insurance under the National Flood Insurance Program.

The Project site is not located within a floodplain. According to FEMA FIRM Community Panel Number 06097C0566E, the Project site is within Zone X (areas of minimal flood hazard) and is not within a SFHA. Therefore, per HUD guidance, because the Project is not located within a Special Flood Hazard Area, there are no formal compliance steps or mitigation required and no further analysis is necessary.

**Documentation:**


### Clean Air

Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93

<table>
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<th>Yes</th>
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The Project site is located in southern Sonoma County where air quality is regulated by the Bay Area Air Quality Management District (BAAQMD). The BAAQMD is the regulatory agency that oversees air quality for the Project area, which is in the San Francisco Bay Area Air Basin. The region is in federal non-attainment for ozone (O3) and particulate matter (PM2.5).

In the short term, Project-related emissions would be generated by construction equipment, fugitive dust, worker vehicle exhaust, and applications of asphalt and surface coatings. Long-term emissions would be
generated by the Project via mobile source emissions (i.e., motor vehicles), energy emissions (e.g., electricity usage), and area source emissions (e.g., consumer products, architectural coatings, and landscaping equipment). However, as determined through air quality modeling prepared for the Project by Michael Baker, 2019, the Project’s annual construction and operational emissions would be less than the U.S. Environmental Protection Agency’s (USEPA) de minimis emissions thresholds, as shown in Table 1, below.

**Table 1: Project-Related Construction and Operational Emissions**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Maximum Emissions (Tons/Year)</th>
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<tbody>
<tr>
<td></td>
<td>ROG/VOC</td>
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<tr>
<td>Construction Emissions</td>
<td>0.45</td>
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<tr>
<td>Operational Emissions</td>
<td>0.21</td>
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<tr>
<td>De Minimis</td>
<td>10</td>
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<tr>
<td>Significant (Yes or No)</td>
<td>No</td>
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Therefore, no adverse effect would result from the Proposed Project, the Proposed Project would be consistent with HUD’s guidance on air quality.

Further, a Health Risk Assessment (HRA) Report was prepared for the Project by MD Acoustics, LLC in October 2021. The HRA was performed to address the possibility of cancer risk associated with road-source diesel air emissions (from U.S. Highway 101 and Old Redwood Highway) and includes a discussion of cancer risk thresholds of significance, analysis of cancer risk associated with construction diesel emissions, and mitigation measures, as necessary.

A toxic air contaminant (TAC) is defined as an air pollutant which may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. In 1998, the California Air Resources Board (CARB) identified DPM as a toxic air contaminant based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. Both BAAQMD and CARB have monitoring networks in Sonoma County that measure ambient concentrations of certain TACs that are associated with important health-related effects, and are present in appreciable concentrations in the San Francisco Bay Area Air Basin (SFBAAB). The BAAQMD uses this information to determine health risks for a particular area. Diesel engines emit a complex
mixture of pollutants, including very small carbon particles, or "soot" coated with numerous organic compounds, known as diesel particulate matter (DPM). Asbestos is also a TAC and is considered a Hazardous Air Pollutant by USEPA. Asbestos occurs naturally in mineral formations and crushing or breaking these rocks, through construction or other means, can release asbestiform fibers into the air.

The BAAQMD defines health risk thresholds, which are represented as a cancer risk and a non-cancer hazard to the public from exposures to TACs. Cancer risk represents the probability (in terms of risk per million individuals) that an individual would contract cancer resulting from exposure to TACs continuously over a lifetime exposure period of 30 years for sensitive receptors. The health risk thresholds are as follows:

- Lifetime probability of contracting cancer is greater than 10 in 1 million at the nearest sensitive receptor or off-site worker; and
- Ground-level concentrations of non-carcinogenic toxic air pollutants would result in a Hazard Index of 1.0 or greater.

The proposed residential units would be as close as 40 feet from Old Redwood Highway and 485 feet from U.S. Highway 101.

The HRA determined that the Project would not be a significant source of toxic air contaminants (TACs) and would also not be exposed to significant DPM TAC emissions or cancer risk from nearby traffic along U.S. Highway 101 and Old Redwood Highway. Therefore, it is concluded that the Project site would not be impacted by TAC emissions. The operational health risk impacts for non-cancer related impacts are less than 1.0; therefore, they are considered to be less significant. Future residential uses would not be exposed to significant levels of TACs from nearby industrial facilities.

Based on the analysis above, there are no formal compliance steps or mitigation are required and no further analysis is required.

Documentation:
## Coastal Zone Management

Coastal Zone Management Act, sections 307(c) & (d)

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The Coastal Zone Management Program (CZMP) is authorized by the Coastal Zone Management Act. Projects that can affect a coastal zone must be carried out in a manner consistent with the state CZMP under Section 307(c) and (d) of the act.

California’s coastal zone generally extends 1,000 yards inland from the mean high tide line. In significant coastal estuarine habitat and recreational areas, it extends inland to the first major ridgeline or 5 miles from the mean high tide line, whichever is less. The Project site is over 18 miles east (inland) of the coast. As such, the Project site is not within the coastal zone and does not involve the placement, erection, or removal of materials, or an increase in the intensity of use, in the coastal zone.

**Documentation:**


## Contamination and Toxic Substances

24 CFR Part 50.3(i) & 58.5(i)(2)

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<th>Yes</th>
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HUD policies state that all property proposed for use in HUD programs shall be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended use of the property. Further, an environmental review of residential properties shall include an evaluation of previous uses of the site and other evidence of contamination on or near the site, to ensure that future residents of the proposed site are not adversely affected by the hazards. HUD guidance states that particular attention should be given to any proposed site on or in the general vicinity of dumps, landfills, industrial sites, or other locations that contain, or may have contained, hazardous materials/wastes.

In the State of California, Section 65962.5 of the Government Code requires that the California Department of Toxic Substances Control (DTSC), the California Department of Public Health (CDPH), and the State Water Resources Control Board (SWRCB) compile lists of all hazardous waste facilities subject to corrective action; all sites included in the Abandoned Site Assessment Program; all drinking water wells that contain detectable levels of organic contaminants; all underground storage tanks with unauthorized releases; and all solid waste disposal sites with a migration of hazardous materials.
The Project site is not included on any of the above-described lists compiled by the DTSC, CDPH, or the SWRCB. The DTSC maintains the EnviroStor database, which provides a list of all hazardous waste sites, as required by Section 65962.5 described above, as well as information about other sites that are under investigation of reported hazardous substance contamination and past cases where contamination was identified at a site and properly removed.

According to the DTSC and the USEPA, there are no hazardous materials contamination sites on or adjacent to the Project site. DTSC does not identify any such sites with 1,000 feet of the Project site. USEPA does not identify any sites in the Town of Windsor.

In addition, a field visit conducted by Town of Windsor Planner Kim Voge on January 21, 2020, did not identify any signs of on-site or nearby potentially toxic, hazardous, or radioactive substances that could affect the health and safety of Project occupants or conflict with the intended use of the property.

**Documentation:**


<table>
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<tr>
<th>Endangered Species</th>
<th>Yes</th>
<th>No</th>
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<tr>
<td>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</td>
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A Biological Assessment was completed for the Project site in November 2018 by Weimeyer Ecological Associates and an Aquatic Resources Survey Report was prepared for the Project by Stantec in 2020.

The purpose of the Biological Assessment is to determine whether the Project site provides habitat for any special status plant or animal species, and whether the Project site includes any special status habitats, such as wetlands and waterways.

Special status plant species surveys were conducted on the Project site during the 2008, 2009, and 2018 blooming seasons. Special-status species were not identified on the Project site. Similarly, special status animal species surveys were conducted in 2008, 2009, and 2018 and included surveys and inspections of Project site groundcover, trees, and the existing barn (to determine if barn owls or bats were utilizing the barn).
The Biological Assessment determined that habitat types on the Project site include annual grassland, seasonal wetlands, landscaped areas, and ruderal (disturbed) habitats. However, further investigation by Stantec in 2020 determined that there are no seasonal wetlands on the Project site. This was confirmed by the U.S. Army Corps of Engineers (USACE) in an approved jurisdictional determination (conducted pursuant to Section 404 of the Clean Water Act), dated April 6, 2022, which determined that the Project site “is comprised entirely of uplands” and does not include any jurisdictional (protected) wetlands.

Construction activities and tree removal have the potential to impact raptors and native nesting birds. Tree removal has the potential to impact special-status bat species and other native roosting bats. While these bat and raptor species are considered special status, they are not listed as endangered or threatened by the USFWS under the Endangered Species Act. Impacts to these protected raptor and bat species are discussed in the Wildlife section of this Environmental Assessment.

As such, the Project would have no effect on endangered or threatened species or critical habitat. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.

Documentation:
(11b) U.S. Army Corps of Engineers, Approved Jurisdictional Determination, pursuant to Section 404 of the Clean Water Act, April 6, 2022.

<table>
<thead>
<tr>
<th>Explosive and Flammable Hazards</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>24 CFR Part 51 Subpart C</td>
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The proposed Project does not include an aboveground stationary storage tank.

According to the California Environmental Protection Agency Regulated Site Portal, there are two above ground storage tanks within a mile of the Project site. The closest site is approximately 0.36 miles from the Project site and is within an Acceptable Separation Distance. In short, the Project site and the immediate surrounding area are free of hazardous materials, contamination, toxic chemicals, gases, and radioactive substances that could affect health or safety, or conflict with the intended use of the Project Site. Therefore, there
<table>
<thead>
<tr>
<th><strong>Farmlands Protection</strong></th>
<th><strong>Floodplain Management</strong></th>
<th><strong>Historic Preservation</strong></th>
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</thead>
<tbody>
<tr>
<td>Federal projects are subject to Farmland Protection Policy Act requirements if they may irreversibly convert farmland to a non-agricultural use.</td>
<td>Compliance with Executive Order 11988, Floodplain Management, is required if a project involves property acquisition, and management, construction, or improvement within a 100-year floodplain or a &quot;critical action&quot; within a 500-year floodplain.</td>
<td>Three cultural resources studies were completed in support of the Project and included the methods and results of cultural resources identification efforts including delineation of the area of potential effect (APE), a Northwest Information Center records search, historic map review, Native American Heritage Commission Sacred Lands File search, Native American consultation, archaeological and built environment field</td>
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surveys, archival research, evaluation of two built environment properties for eligibility to the National Register of Historic Places (National Register) and California Register of Historical Resources (California Register), and archaeological testing within the APE. These studies were completed to determine whether the Project could result in adverse effects to historic properties in accordance with Section 106 of the National Historic Preservation Act.

Two built environment resources were evaluated for inclusion in the National Register and California Register. 8685 Old Redwood Highway, a single-family residence and barn, was determined ineligible for listing in either register, and 8635 Old Redwood Highway, a single-family Queen Anne-style residence, was determined ineligible for listing in the National Register, but eligible for listing in the California Register as a good example of Queen Anne-style architecture. It is not a historic property as defined by 36 CFR 800.16, because it is not eligible for the National Register. No prehistoric or historic-period archaeological resources were identified in the APE.

The California Office of Historic Preservation concurred with the evaluation findings and finding of no historic properties affected on April 14, 2020.

While no prehistoric or historic-period archaeological resources were identified in the course of the studies, the APE maintains archaeological sensitivity due to a long history of prehistoric and historic occupation. There is the potential to discover previously unidentified archaeological resources during ground-disturbing activities. Because of this, the Project shall implement mitigation measures identified in the Mitigation Measures and Conditions section below.

**Mitigation Measure CUL-1: Preconstruction Meeting and Training.** A qualified archaeologist shall provide a preconstruction meeting with cultural resources awareness training to all construction personnel who will conduct ground-disturbing activities. The training shall include information regarding the types of artifacts, prehistoric and historic-period, that may be encountered during earth-disturbing activities, as well as the procedures to follow if resources are identified during construction and an archaeologist is not present. The training must occur prior to the start of the Project and any ground-disturbing activities.
### Mitigation Measure CUL-2: Treatment of Previously Unidentified Archaeological Deposits

If suspected prehistoric or historic-period archaeological deposits are discovered during construction, all work within 25 feet of the discovery shall be redirected and a Secretary of the Interior Professionally Qualified Archaeologist and/or Registered Professional Archaeologist shall assess the situation and make recommendations regarding the treatment of the discovery. Impacts to significant archaeological deposits should be avoided if feasible, but if such impacts cannot be avoided, the deposits shall be evaluated for their eligibility to the California Register of Historical Resources and National Register of Historic Places. If the deposits are not California Register or National Register eligible, no further protection of the find is necessary. If the deposits are eligible, effects shall be avoided or mitigated. Acceptable mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility.

**Documentation:**

- (17) Results of An Extended Phase I Archaeological Study for the Proposed Heritage Park Apartments Project, 8685 Old Redwood Highway, Windsor, Sonoma County, California.

### Noise Abatement and Control

<table>
<thead>
<tr>
<th>Noise Abatement and Control</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</td>
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### Roadways:

According to the Windsor General Plan Environmental Impact Report Noise Contour map under existing conditions, the Project site is within the 70 dBA and 65 dBA noise contours for Old Redwood Highway. Under 2040 buildout conditions, the Project site would be entirely in the 70 dBA noise contour.

Per HUD guidance, an a CEQ Acceptable exterior day-night average sound level is not to exceed 65 dB. For project sites with an average sound level above 65 dB,
but not exceeding 75 dB, HUD requires noise attenuation for new construction.

Per the Town of Windsor General Plan, an acceptable exterior day-night average sound level is not to exceed 55 dB. Average sound levels between 55 and 70 dB are normally unacceptable. For project sites within the normally unacceptable range, the Town of Windsor requires noise insulation features to be included in the project design.

Based on projected noise levels at the Project site and HUD and Town of Windsor noise regulations, the Project would be required to attenuate exterior noise levels to an acceptable level. A sound wall will be constructed on the western boundary of the Project site so that noise levels associated with U.S. Highway 101, which would be confirmed by a qualified acoustical consultant, would not exceed HUD standards. The Town of Windsor would not issue a building permit for the Project until it meets HUD exterior noise standards. See Mitigation Measure NOI-1, below.

**Aircraft Flyovers:**
The Project site is approximately 2 miles from the Sonoma County Airport and, according to the Airport Master Plan Update, is outside the existing and forecasted 65 dB contour line of the airport. Therefore, aircraft-related noise levels at the Project site are acceptable (at or below 65 dB).

**Railroad Activity:**
The Sonoma Marin Area Rail Transit (SMART) operates a rail corridor that traverses the town from north to south and accommodates freight and passenger trains.

The closest segment of this rail line is approximately 2,000 feet southeast of the Project site. However, the Project site is outside the noise contours of the rail line as defined in the Windsor General Plan Environmental Impact Report. Therefore, railroad-related noise will not affect the Project site.

**Mitigation Measure NOI-1:** Sound Wall. If determined by a qualified noise study to be necessary, a sound wall shall be constructed along the western property line to reduce traffic noise from U.S. Highway 101 to ensure exterior noise levels meet applicable standards. The sound wall shall be included on building and improvement plans. Timing/Implementation would
occur prior to construction and enforcement monitoring would be overseen by the Town of Windsor.

Documentation:


<table>
<thead>
<tr>
<th>Sole Source Aquifers</th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</td>
<td>☑</td>
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<tr>
<td>The Project site is not located on a sole source aquifer or within a designated sole source aquifer watershed area per USEPA Region 9 Ground Water Office.</td>
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<td>Documentation:</td>
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<tr>
<th>Wetlands Protection</th>
<th>Yes</th>
<th>No</th>
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<tr>
<td>Executive Order 11990, particularly sections 2 and 5</td>
<td>☑</td>
<td>□</td>
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<tr>
<td>The Proposed Project would consist of new construction, as defined in Executive Order 11990 (“draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of this Order [May 1977]”). According to the Aquatic Resources Survey Report prepared for the Project by Stantec in 2020 there are no seasonal wetlands on the Project site. This finding was confirmed by the U.S. Army Corps of Engineers (USACE) in an approved jurisdictional determination (conducted pursuant to Section 404 of the Clean Water Act), dated April 6, 2022, which determined that the Project site “is comprised entirely of uplands” and does not include any jurisdictional (protected) wetlands.</td>
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<tr>
<td>Grading and construction activities associated with the Project would be required to comply with stormwater runoff and sedimentation prevention requirements. Because grading- and construction-related sediment would be regulated by state and local water quality protections no wetlands would be impacted in terms of Executive Order 11990’s definition of new construction. Therefore, there are no formal compliance steps or mitigation required and no further analysis is necessary.</td>
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<td>Documentation:</td>
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### Wild and Scenic Rivers

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The closest National Wild and Scenic Rivers System river to the Project site, including designated Wild and Scenic Rivers, study rivers, and Nationwide Rivers Inventory river segments, is Eel River, immediately west of the Mendocino National Forest. Eel River is located over 60 miles north of the Project site and would not be affected by the Project.

**Documentation:**


### ENVIRONMENTAL JUSTICE

<table>
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<tr>
<th>Yes</th>
<th>No</th>
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The Project would provide affordable housing to very low- and low-income individuals and families. The proposed units would result in beneficial long-term social and economic impacts for low-income individuals.

As discussed in the Clean Air section, above, residents at the Project site would not be exposed to substantial health risks related to cancer, acute and chronic hazards, or particulate matter. As discussed under Noise Abatement and Control, interior and exterior noise levels on the Project Site would be within HUD’s acceptable conditions following implementation of **Mitigation Measure NOI-1**. Further, as discussed under Contamination and Toxic Substances, the Project would not expose future residents or the surrounding community to hazardous materials. The Project would not expose residents to adverse environmental hazards from aboveground storage tanks. Because the Project would not result in substantial adverse environmental effects, it would not have the potential to result in disproportionately high adverse effects on minority or low-income populations. As such, the Project would result in a beneficial impact for environmental justice communities, and those communities would not be subject to any disproportionate adverse environmental effects as a result of the Project.

### Environmental Assessment Factors

[24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the Project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or
consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list to make the determination of impact for each factor.

1. Minor beneficial impact
2. No impact anticipated
3. Minor Adverse Impact – May require mitigation
4. Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

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<thead>
<tr>
<th>Environmental Assessment Factor</th>
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<th>Impact Evaluation</th>
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<tbody>
<tr>
<td><strong>LAND DEVELOPMENT</strong></td>
<td></td>
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<tr>
<td>Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design</td>
<td>2</td>
<td>No impact anticipated. The Project site is designated by the Town of Windsor General Plan as Boulevard Mixed Use and is zoned Boulevard Commercial. The Project received three development concessions, including an elimination of required nonresidential components, a parking space reduction, and an increase in the allowable front setback. The concessions are allowed under existing zoning because the Project would provide affordable housing to low- and very low-income families. The Project site’s land use designation is consistent with the current zoning and General Plan.</td>
</tr>
<tr>
<td>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</td>
<td>2</td>
<td>According to the Natural Resources Conservation Service, soil on the Project site is classified as Huichica loam at 0 to 2 percent slopes and is moderately well drained. Because the Project site is relatively flat, there is low potential for soil erosion. A geotechnical study will be prepared for the Project site to confirm suitability of soil for the type of Project. The Town of Windsor would require the Project to conform with all applicable soil and foundation codes of the California Building Code.</td>
</tr>
<tr>
<td>Hazards and Nuisances</td>
<td>3</td>
<td>No nuisances or hazards were observed at the subject property or surrounding properties during the subject property inspection.</td>
</tr>
<tr>
<td>including Site Safety and Noise</td>
<td>As analyzed above, exterior noise levels would exceed an acceptable range. However, a noise attenuation wall would be constructed on the Project site to reduce noise levels to an acceptable level, as discussed in Mitigation Measure NOI-1.</td>
<td></td>
</tr>
</tbody>
</table>
| Energy Consumption | The Project would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6, of the California Code of Regulations, California’s Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. The Code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances. In addition, the California Green Building Standards Code sets targets for: energy efficiency; water consumption; dual plumbing systems for potable and recyclable water; diversion of construction waste from landfills; and use of environmentally sensitive materials in construction and design, including eco-friendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels.

The Project would be required to incorporate energy conservation measures in compliance with Title 24 and the California Green Building Standards Code, which would ensure that the Project would not adversely affect energy consumption or supplies.

Additionally, the following energy saving measures, as part of the Sonoma County Climate Action Plan, would be implemented as part of the Project:
- Measure 1-S1: Title 24 Standards for Commercial and Residential Building
- Measure 1-S2: Lighting Efficiency and Toxics Reduction Act (AB 1109)
- Measure 1-L2: Outdoor Lighting
- Measure 1-L3: Shade Tree Planting
- Measure 9-R1 Waste Diversion Goal
- Measure 11-R1: Countywide Water Conservation Support and Incentives
- Measure 11-L1: Senate Bill SB X7-7 Water Conservation Act of 2009

Per Executive Order 14008, and HUD’s guidance to demonstrate that Projects are resilient to climate change, the following analysis demonstrates that the Project would be resilient to the effects of climate change and would not substantially contribute to greenhouse gas emissions.
Regarding greenhouse gas emissions, as stated above, the Project would be required to incorporate energy conservation measures in compliance with Title 24 and the California Green Building Standards Code, which would ensure that the Project would not adversely affect energy consumption or supplies. Further, the Project would be designed with integrated solar photovoltaic panels on the top of the carport structures, which would offset Project-related energy demand.

With regard to climate change risks, FEMA’s National Risk Index, which is an online tool used to illustrate the United States communities most at risk for 18 natural hazards, including avalanche, coastal flooding, cold wave, drought, earthquake, hail, heat wave, hurricane, ice storm, landslide, lightning, riverine flooding, strong wind, tornado, tsunami, volcanic activity, wildfire, and winter weather. Per the National Risk Index, the census tract including the Project Site (06097153808) has a “relatively high” summary risk index of 27.83/100, which is greater than the California average (22.57) and the national average (16.91).

However, the majority of the risk is informed by a “very high” risk score for earthquake hazards and a “relatively high” risk score for riverine flooding, with the remaining 16 natural hazards having “relatively low” or “very low” risk scores (i.e., the Project Site is not at high risk for these hazards). Like much of California, the Project site may be prone to seismic ground shaking. The Town of Windsor General Plan identifies the Project site as being in an area susceptible to extreme earthquake shaking potential. However, the Town of Windsor’s enforcement of its building code would ensure that future construction would be consistent with seismic safety requirements in the California Building Code. New construction is required to adhere to standard civil engineering design principles and must be adopted per Town standards. The Project is in an area that is subject to seismic activity from the Healdsburg-Rodgers Creek fault; however, no faults are known to occur within the Project site. Therefore, the risk of damage due to primary fault rupture is determined to be low. Additionally, the Project site is not in an area prone to landslides or liquefaction. Regarding the risk for riverine flooding, the Project site is not located within a floodplain. According to FEMA FIRM Community Panel Number 06097C0566E, the Project site is within Zone X (areas of minimal flood hazard) and is not within a SFHA.

Therefore, because the Project would include design features that would reduce the Project’s electricity demand (and thus reduce greenhouse gas emissions), and because the Project Site is located within an area that has “relatively moderate” risk index when compared with the country as a whole and has low or very low risks of impacts associated with hazards exacerbated by climate change.
change, such as heat waves, coastal flooding, or sea level rise, the Project would be consistent with Executive Order 14008.

Documentation(22) FEMA, National Risk Index Report, generated August 10, 2022.

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<tr>
<td>Employment and Income Patterns</td>
<td>1</td>
<td>Beneficial impact anticipated. The Project is new construction and would require the employment of skilled labor and professionals. No jobs exist on the Project site. The development of 33 apartment units would likely create a permanent property manager position and contribute to the creation of maintenance and landscaping jobs. The jobs created by this Project would likely be filled by residents of the Town of Windsor and region.</td>
</tr>
<tr>
<td>Demographic Character Changes, Displacement</td>
<td>2</td>
<td>No impact anticipated. The Project would provide 32 affordable units to very low- and low-income individuals and families and 1 unrestricted manager’s unit. The Project site is located in a residentially and commercially developed area. The Project is compatible with the surrounding neighborhood and no physical division of the neighborhood would occur.</td>
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<td><strong>COMMUNITY FACILITIES AND SERVICES</strong></td>
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<tr>
<td>Educational and Cultural Facilities</td>
<td>2</td>
<td>No impact anticipated. As a residential Project, payment of school impact fees would be required at the time building permits are approved. These fees would contribute to the construction of new school facilities. Under state law, payment of impact fees would render Project impacts on schools less than significant. The Project site is within less than a mile from an elementary school and a high school. Students would be able to safely walk or bike to school with existing pedestrian infrastructure and school crosswalks.</td>
</tr>
<tr>
<td>Commercial Facilities</td>
<td>2</td>
<td>No impact anticipated. The Project site is in proximity to several commercial buildings that residents of the Project would be able to patronize, such as grocery stores, a laundromat, several restaurants, and a bank.</td>
</tr>
<tr>
<td>Health Care and Social Services</td>
<td>2</td>
<td>No impact anticipated. The Project site is located in an urban area with healthcare and social services located throughout the region. Several medical clinics are in the vicinity of the Project. The Project would result in an additional estimated 99 residents, 0.3 percent of the Town’s existing population of 27,432. The addition of these residents would not overwhelm existing healthcare and social services in the area.</td>
</tr>
<tr>
<td>Solid Waste Disposal / Recycling</td>
<td>2</td>
<td>No impact anticipated. There are no landfills in Windsor or in the Town’s sphere of influence. The Town receives services from Sonoma County Resource Recovery (SCRR) to pick up solid waste, recyclables, and green waste. Non-recyclable solid waste and green waste are delivered to the</td>
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Healdsburg Transfer Station at 166 Alexander Valley Road in Healdsburg, California. The transfer station has a permitted capacity of 720 tons per day. The Town’s waste delivery agreement requires SCRR to direct inorganic non-recyclable trash to the Central Disposal Site in Petaluma, California. The Central Disposal Site has a daily permitted disposal of about 1,050 tons per day and a remaining capacity of about 9 million cubic yards.

The Project would generate a demand for solid waste collection services, including during construction and demolition activities. According to the California Department of Resources Recycling and Recovery (CalRecycle), the statewide per resident disposal rate was 5.2 pounds per resident per day in 2017. With an estimated 99 residents, the Project would generate 514.8 pounds of solid waste per day, or approximately 94 tons per year. Given the capacity of the facilities that would serve the Project site, waste facilities with adequate capacity are available to accommodate the additional solid waste.

Documentation

| Waste Water / Sanitary Sewers | The Town’s wastewater treatment facility has a capacity of 2.25 million gallons per day (mgd). The wastewater treatment facility is permitted for an average dry weather flow of 1.9 mgd. A Water Demand Study, performed by Water Resource Engineering Associates in July 2019, estimates that the proposed Project’s water demand would be 9,360 gallons per day. Assuming 100 percent of the domestic water would be converted to wastewater and discharged to the wastewater treatment system, the wastewater treatment facility has sufficient capacity remaining to adequately treat domestic wastewater from the proposed Project. The existing conveyance and treatment facilities serving the Town have sufficient capacity to serve the Project. |
| Water Supply | No impact anticipated. The Town of Windsor would provide water to the Project. The 2040 General Plan Environmental Impact Report Projects that the Town is expected to have sufficient water supply to accommodate planned development through 2040. The Project would be part of the planned development. The water is safe for drinking and the Town tests the water quality regularly. |
| Public Safety - Police, Fire and Emergency Medical | No impact anticipated. The Project site is already served by the Sonoma County Fire District and the Windsor Police Department. The Windsor Fire Protection District provides fire suppression, fire safety, and emergency medical services to the Town of Windsor. The Windsor Police Department, staffed by the Sonoma County Sheriff’s Department, |

Documentation
provides patrol duties, traffic enforcement, school resource officer, special event security, group/committee participation, conduct of investigations, and a K9 unit. The Project would pay development impact fees for police and fire protection services.

| Parks, Open Space and Recreation | No impact anticipated. The Town of Windsor maintains 19 parks, totaling approximately 119 acres, and has access to three regional parks operated by Sonoma County, totaling approximately 1,361 acres. Parks and facilities include sports fields, children’s play places, and senior recreation. The Project site is 300 feet south of Pueblo Viejo Park and 2,700 feet southeast of Windsor Town Green. The Project would result in an estimated 99 additional residents, which represents less than 0.3 percent of the Town’s 27,423 population. Upon issuance of a building permit, the Project applicant will be required to pay impact fees for parks, recreation, open space, and trails. These impact fees will allow the Town to provide new recreational opportunities and maintain existing facilities. |
| Transportation and Accessibility | No impact anticipated. The Project would be served by Sonoma County Transit. Four bus routes operate throughout the Town and a bus stop is located approximately 300 feet from the Project site. Sonoma County Transit also offers paratransit service to people with disabilities unable to ride standard fixed-route buses. Paratransit operates within .75 miles from all standard fixed-route bus stops. The Project would be built in accordance with the Americans with Disabilities Act. |

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<tr>
<td>NATURAL FEATURES</td>
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<tr>
<td>Unique Natural Features, Water Resources</td>
<td>2</td>
<td>There are no surface water features, sole source aquifers, or other water resources on or adjacent to the Project site, as noted above in the Sole Source Aquifers, Wetlands Protection, and Wild and Scenic Rivers sections of this Environmental Assessment. Further, there are no unique geological features on or immediately adjacent to the Project site that are of special social/cultural, economic, educational, aesthetic, or scientific value. The Project site includes 58 trees varying in size, species and health. A total of 36 of these trees would be removed by Project-related construction activities. However, the proposed Project is required to comply with the Town of Windsor Tree Preservation and Protection Ordinance. In addition to complying with the Town of Windsor’s Tree Preservation Ordinance through payment of tree mitigation fees, the Project’s landscape plan proposes to plant an additional 64 trees throughout the Project site. Therefore, because Project-related construction activities would take place on a site that has been disturbed by past land management activities, and because the Project site is located within a fully urbanized environment that is surrounded by disturbed areas (such as sidewalks, commercial and residential uses, streetlights, and major arterial streets).</td>
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</table>
the Project would not impact any natural features, water resources, or geologic features. Therefore, there are no compliance measures required and no further analysis is necessary.

### Vegetation, Wildlife

As discussed above in the Endangered Species section of this Environmental Assessment, removal of trees and structures has the potential to impact special-status bat species and other native roosting bats. The trees onsite may also provide nesting sites for migratory birds and raptors. Raptors (birds of prey), migratory birds, and other avian species are protected by state and federal laws, such as the federal Migratory Bird Treaty Act (MBTA) (42 USC Sections 703–712), which prohibits the killing, possessing, or trading of migratory birds except in accordance with regulations prescribed by the Secretary of Interior, as well as Section 3503.5 of the California Fish and Game Code, which states that it is “unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.”

Given the potential for migratory birds to nest in the trees proposed for removal by the Project, impacts to nesting birds protected by the MBTA could occur if construction activities were to occur during nesting season. While migratory bird species are considered highly mobile and would naturally avoid areas with loud construction noise, removal of active nests during the nesting season could lead to the loss of young and/or eggs.

Therefore, the mitigation measures below would protect nesting birds and bats during Project-related demolition and construction activities, and would ensure that the Project would be consistent with the MBTA. With implementation of these mitigation measures, the Project would not have adverse effects on vegetation and wildlife species.

**Mitigation Measure BIO-1**: In the event that construction activities are initiated (including land clearing, demolition, and/or tree removal) within the avian nesting season (February 1–August 31), a preconstruction survey shall be performed by a qualified biologist on the site to locate any active nests on or immediately adjacent to the site. The preconstruction survey shall be performed within 15 days before initiation of site activities. If active nests are identified, protective measures shall be implemented. An appropriate non-disturbance buffer zone shall be established—typically up to 300 feet for raptors and 50 feet for passerines, or as otherwise recommended by the biologist. These protection measures shall remain in effect until the young have left the nest and are foraging independently or the nest is no longer active, as determined by the biologist. If land-clearing activities (including all vegetation removal) can be performed outside of the nesting season (September 1–January 31), no preconstruction surveys for nesting birds are warranted.
Mitigation Measure BIO-2: To ensure that actively roosting bats are not disturbed as a result of building demolition, tree trimming, and tree removal, the following mitigation measures would be implemented to avoid impacts to bat species.

1. The pruning or removal of living trees or snags must not occur during the maternity season between April 1 and September 1 to minimize the disturbance of young that may be present and unable to fly.

2. The pruning or removal of living trees or snags must occur between the hours of 12 p.m. and sunset on days after nights when low temperatures were 50° or warmer to minimize impacting bats that may be present in deep torpor.

3. When it is necessary to perform crown reduction on trees over 12 inches in diameter breast height or remove entire trees or branches over 6 inches in diameter, there shall be preliminary pruning of small branches less than 2 inches in diameter performed the day before. The purpose of this is to minimize the probability that bats would choose to roost in those trees the night before the work is performed. If it is not possible to implement Measures 2 and/or 3, then a qualified bat biologist will be required to conduct tree cavity surveys and humanely evict roosting bats within 24 hours of vegetation management activities. Measure 1, i.e., avoidance of maternity season, is critical as young bats that are not able to fly cannot be humanely evicted.

4. Prior to demolition activities, a survey shall be conducted by a qualified bat biologist to determine the presence of bats in the existing single-family residence and barn structures. Should bats be present, passive eviction strategies would be used to humanely evict the bats.

Other Factors

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<td>2</td>
<td>No other factors have been identified.</td>
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Additional Studies Performed:

- Biological Assessment, Heritage Park, 8685 Old Redwood Highway, Windsor, CA
- Wetland Delineation, Vintage Oaks, 8685 Old Redwood Highway, Windsor, CA
- Approved Jurisdictional Determination, pursuant to Section 404 Clean Water Act, 2022
- Heritage Park Project, Supplemental Review of Trees on Old Redwood Highway
- Water Demand Study – 8685 Old Redwood Highway, Heritage Park Multi-Family Residential Development
- Tree Preservation and Mitigation Report, Heritage Park Apartments
- Traffic Impact Study for the Heritage Park Project
- Heritage Park Project CalEEMod
- Historic Property Survey for the Heritage Park Apartments Project
- Historic Resource Evaluation for the Heritage Park Apartments Project

**Field Inspection** (Date and completed by): Kim Voge, January 21, 2020

**List of Sources, Agencies and Persons Consulted** [40 CFR 1508.9(b)]:
- California Department of Fish and Wildlife
- Evans & De Shazo
- Horticulture Associates
- Town of Windsor
- US Army Corps of Engineering
- US Fish and Wildlife Service
- Water Resource Engineering Associates
- Weimeyer Ecological Sciences
- W-Trans

**List of Permits Obtained:** N/A.

**Public Outreach** [24 CFR 50.23 & 58.43]: A notice of finding of no significant impact and notice of intent to request release of funds for the Project was published by the Town of Windsor and Sonoma County Community Development Commission in the Press Democrat on April 30, 2021 and was distributed to interested parties, tribes, local governments, the USEPA, and HUD in May 2021.

Before finalizing this Project’s Environmental Assessment, the City will publicly disseminate/publish the Environmental Assessment’s findings, as required by 24 CFR 58.43 and 24 CFR 58.70. The City will consider the public comments received on any Project-related notices and, if appropriate, would make modifications in response to the comments.

**Cumulative Impact Analysis** [24 CFR 58.32]: No significant impacts were identified for the proposed Project. Therefore, there would be no cumulative impacts.

**Alternatives** [24 CFR 58.40(e); 40 CFR 1508.9]: None.

**No Action Alternative** [24 CFR 58.40(e)]: Without the Project, a significant need for affordable housing in the area would be delayed in being met or not met. The site is close to necessary amenities. In the absence of the Project, a commercial business would be suitable for the location. However, there is no pending application for a commercial facility on the site, and no demonstrated need for more commercial locations in the area. There is a substantial need for affordable housing in the region and difficulty in securing land and entitlements to provide it.

**Summary of Findings and Conclusions:** The Project would not negatively impact the surrounding environment and will not have an adverse environmental or health effect on end users. The Project complies with NEPA and other related federal and state environmental laws.

**Mitigation Measures and Conditions** [40 CFR 1505.2(c)]
Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into Project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure</th>
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<tbody>
<tr>
<td>Endangered Species, Wetlands Protection, Unique Natural Features, Water Resources</td>
<td>In the event that construction activities are initiated (including land clearing, demolition, and/or tree removal) within the avian nesting season (February 1–August 31), a preconstruction survey shall be performed by a qualified biologist on the site to locate any active nests on or immediately adjacent to the site. The preconstruction survey shall be performed within 15 days before initiation of site activities. If active nests are identified, protective measures shall be implemented. An appropriate non-disturbance buffer zone shall be established—typically up to 300 feet for raptors and 50 feet for passerines, or as otherwise recommended by the biologist. These protection measures shall remain in effect until the young have left the nest and are foraging independently or the nest is no longer active, as determined by the biologist. If land-clearing activities (including all vegetation removal) can be performed outside of the nesting season (September 1–January 31), no preconstruction surveys for nesting birds are warranted.</td>
</tr>
<tr>
<td>Endangered Species, Wetlands Protection, Unique Natural Features, Water Resources</td>
<td>To ensure that actively roosting bats are not disturbed as a result of building demolition, tree trimming, and tree removal, the following mitigation measures would be implemented to avoid impacts to bat species.</td>
</tr>
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trees the night before the work is performed. If it is not possible to implement the first two mitigation measures, then a qualified bat biologist will be required to conduct tree cavity surveys and humanely evict roosting bats within 24 hours of vegetation management activities. Measure 1, i.e., avoidance of maternity season, is critical as young bats that are not able to fly cannot be humanely evicted.

4. Prior to demolition activities, a survey shall be conducted by a qualified bat biologist to determine the presence of bats in the existing single-family residence and barn structures. Should bats be present, passive eviction strategies would be used to humanely evict the bats.

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<th>Act</th>
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<td>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</td>
<td>Preconstruction Meeting and Training. A qualified archaeologist shall provide a preconstruction meeting with cultural resources awareness training to all construction personnel who will conduct ground-disturbing activities. The training shall include information regarding the types of artifacts, prehistoric and historic-period, that may be encountered during earth-disturbing activities, as well as the procedures to follow if resources are identified during construction and an archaeologist is not present. The training must occur prior to the start of the Project and any ground-disturbing activities.</td>
</tr>
<tr>
<td>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</td>
<td>Treatment of Previously Unidentified Archaeological Deposits. If suspected prehistoric or historic-period archaeological deposits are discovered during construction, all work within 25 feet of the discovery shall be redirected and a Secretary of the Interior Professionally Qualified Archaeologist and/or Registered Professional Archaeologist shall assess the situation and make recommendations regarding the treatment of the discovery. Impacts to significant archaeological deposits should be avoided if feasible, but if such impacts cannot be avoided, the deposits shall be evaluated for their eligibility to the California Register of Historical Resources and National Register of Historic Places. If the deposits are not California Register or National Register eligible, no further protection of the find is necessary. If the deposits are eligible, effects shall be avoided or mitigated. Acceptable mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility.</td>
</tr>
<tr>
<td>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</td>
<td>Sound Wall. If determined to be necessary through consultation with HUD, a sound wall shall be constructed along the western property line to reduce traffic noise from U.S. Highway 101 to ensure exterior noise levels meet</td>
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applicable standards. The sound wall shall be included on building and improvement plans.

Determination:

☑ Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The Project will not result in a significant impact on the quality of the human environment.

☐ Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The Project may significantly affect the quality of the human environment.

Preparer Signature: Brent Schleck, Senior Environmental Planner, Michael Baker Intl.
Date: September 27, 2022

Certifying Officer Signature: Clare Hartman, Director Planning and Economic Development, NEPA Certifying Officer
Date: 9/29/2022

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/Project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).