APPENDIX G

Environmental Checklist Form

1. Project title: In-Situ Treatment of Contaminated Soil and Groundwater, Former Best Cleaners

2. Lead agency name and address:

   North Coast Regional Water Quality Control Board
   5550 Skylane Boulevard, Suite A
   Santa Rosa, CA 95403

3. Contact person and phone number: Joan Fleck, (707) 576-2675

4. Project location: 1007B West College Avenue, Santa Rosa, California, Sonoma County

5. Project sponsor's name and address: West College Center, LLC, 1211 West College Avenue, Santa Rosa, CA 95401

6. General plan designation: Retail Business

7. Zoning PD-299 (Commercial General)

8. Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

   West College Center, LLC, is proposing to conduct a remediation activity and treat soil and groundwater in situ that is contaminated with volatile organic compounds (VOCs). The selected treatment method is reductive de-chlorination, which uses a carbohydrate source, in this case, cheese whey, as a reducing agent. The project is described in documents titled:

   Feasibility Study/Remedial Action Plan (January 25, 2007)
   Technical Support For Waste Discharge Requirements For The Injection of Whey Based Remediation To Groundwater (April 4, 2008)
   Addendum to the Technical Support for Waste Discharge Requirements For The Injection of Whey Based Remediation To Groundwater (May 20, 2008)
   Air Quality Monitoring Plan (January 29, 2009)
   Additional Waste Discharge Requirements (February 6, 2009)

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

   The site is a former commercial tenant space at the southeast corner of the G&G Shopping Center in Santa Rosa. The shopping center is located in a mixed commercial and residential neighborhood.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

    Sonoma County Environmental Health Division will issue permits for borings and/or groundwater monitoring wells, and injection wells.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐	Aesthetics	☐	Agriculture Resources	☒	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Geology /Soils
☒	Hazards & Hazardous Materials	☒	Hydrology / Water Quality	☐	Land Use / Planning
☐	Mineral Resources	☐	Noise	☐	Population / Housing
☐	Public Services	☐	Recreation	☐	Transportation/Traffic
☐	Utilities / Service Systems	☐	Mandatory Findings of Significance		

DETERMINATION: (To be completed by the Lead Agency)
On the basis of this initial evaluation:

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

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

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

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation

measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

Signature Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1.) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a.) Earlier Analysis Used. Identify and state where they are available for review.
   b.) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c.) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

7.) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

8.) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

9.) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

10.) The explanation of each issue should identify:

   a.) the significance criteria or threshold, if any, used to evaluate each question; and
   b.) the mitigation measure identified, if any, to reduce the impact to less than significance

Issues:

INITIAL STUDY/CHECKLIST

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
1. AESTHETICS -- Would the project:				
a) Have a substantial adverse effect on a scenic vista?	_____	_____	_____	__X__
The project will not have an adverse effect on a scenic vista. (1)[1]				
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	_____	_____	_____	__X__
The project is not within sight of any state scenic highway, and the project would not result in the damaging of scenic resources, as there are no trees, rock outcroppings, and historic buildings within a state scenic highway. (1, 3)				
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	_____	_____	_____	__X__
The project site will not change the existing visual character or quality of the site and its surroundings. (1)				
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	_____	_____	_____	__X__

1 List Of References

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

The project will not create a new source of substantial light or glare. No lights are proposed to be installed as part of the project. (1)

2. AGRICULTURE RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

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

The site is located in a shopping center and zoned planned development (commercial general). The project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. (1, 7, 20)

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

The project site is not zoned for agricultural use and is not protected under an existing Williamson Act contract. (20)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	_____	_____	_____	__X__

Agricultural uses do not exist at the project site. (1, 7, 20)

3. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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

The proposed project is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The project does not violate the BAAQMD 2000 Clean Air Plan. (1, 4)

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

The project could result in the temporary generation of hydrogen sulfide and vinyl chloride gases.
The BAAQMD has an air quality standard for hydrogen sulfide gas of 0.03 parts per million (ppm) or 42 $\mu g/m^3$ (1 hour average). Although the project may result in the generation of hydrogen sulfide gas, it is unlikely. Other past projects using similar technologies within the jurisdiction of the Regional Water Board did not generate hydrogen sulfide gas. The BAAQMD has an air quality standard of 0.010 ppm or 26 $\mu g/m^3$ (24-hour average), for vinyl chloride gas. The project could result in the generation and emission of vinyl chloride gas, but is unlikely. Other past projects using similar technologies within the jurisdiction of the Regional Water Board did not detect

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

vinyl chloride gas in ambient air. (5)

Mitigation Measure 3: The discharger shall comply with Monitoring and Reporting Program Order No. R1-2009-0067 that contains requirements for groundwater and air monitoring, and a contingency plan in the event that BAAQMD air quality violations are detected.

Air quality monitoring will be conducted, including pre and post injection screening in buildings located over the treatment area. Air samples will be collected for chemical analysis, if screening levels of hydrogen sulfide and/or vinyl chloride gases are found above the BAAQMD air quality standards. Air quality screening will also be conducted for other volatile organic gases. If gases are detected above BAAQMD standards, or unsafe levels exist, the occupants of the businesses where the gases were detected will be immediately evacuated and the building will be ventilated. Post ventilation air quality will be established prior to re-entry. Permanent ventilation equipment may be installed for the life of the project and/or cracks or holes serving as vapor migration pathways may also be sealed**.**

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

The proposed project will not result in a cumulatively considerable net increase of any criteria pollutant. There may be a temporary increase in emissions from the mobile injection rig that will be used to inject the reducing agents. The duration of the injection events is two days, with the first two injection events one month apart, then quarterly there after for up to three years. (1, 2, 13, 14, 15, 16)

d) Expose sensitive receptors to substantial pollutant concentrations?	_____	____	__X__	_____

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
See 3b (1, 2, 13, 14, 15, 16)				
e) Create objectionable odors affecting a substantial number of people?	_____	_____	__X__	_____

Objectionable odors may be created in close proximity to the injection equipment and monitoring wells when opened during post injection sampling events. The presence of objectionable odors, if any, will be of short duration.

See 3b. (1, 2, 13, 14, 15, 16)

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

The project site is in a shopping center and is completely paved or concreted. There are no sensitive species identified at the project site. (1, 8)

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
The project site is in a shopping center and is completely paved or concreted. The project will not have an impact on riparian habitat. (1, 8, 14)				
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	_____	_____	_____	__X__
The project site is in a shopping center and is completely paved or concreted. The project site does not contain federally protected wetlands, thus, no wetlands would be directly affected by this project. (1, 8, 9, 14)				
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	_____	_____	_____	__X__
The project will not interfere with the movement of any native resident or migratory fish or wildlife (1, 8, 9, 14)				
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	_____	_____	_____	__X__
The project would not conflict with any adopted policies/regulations regarding biological resources. The proposed project does not include removal of any trees. (1, 8, 9, 14)				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	_____	_____	_____	__X__

The project does not conflict with any local policies or ordinances protecting biological resources. (9, 18, 19)

5. CULTURAL RESOURCES -- Would the project:

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

There are no identified historical resources at the project site. (1, 2, 6, 7, 8)

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

No archaeological resources have been identified at the site. Also, there will be no digging associated with this project.

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

There will be no digging associated with this project. The injections will be conducted in already established injection wells (1, 8)

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
No excavations are planned as part of this project. (1)				
6. GEOLOGY AND SOILS -- Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	_____	_____	_____	__X__
The nearest fault is the Rogers Creek Fault, which is identified in an "area of violent ground shaking during an earthquake." The project, however, will not have a direct impact or contribute any additional ramifications in the event of an earthquake. (1, 8, 14, 15)				
ii) Strong seismic ground shaking?	_____	_____	_____	__X__
The project will not cause strong seismic ground shaking. (1, 5, 14, 15)				
iii) Seismic-related ground failure, including liquefaction?	_____	_____	_____	__X__
The project will not result in seismic-related ground failure including liquefaction (1, 5, 14, 15)				
iv) Landslides?	_____	_____	_____	__X__

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
The project will not result in landslides. (1, 5, 14, 15, 21)				
b) Result in substantial soil erosion or the loss of topsoil?	_____	_____	_____	__X__
The project will not result in erosion or the loss of topsoil (1, 9)				
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	_____	_____	_____	__X__
The project will not result or potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. (1, 5, 14, 15, 21)				
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	_____	_____	_____	__X__
Soils have not been tested for this project as no construction of any building is proposed. (1)				
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	_____	_____	_____	__X__
Soil suitability for waste water disposal units does not need to be conducted as part of this project. (1)				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
7. HAZARDS AND HAZARDOUS MATERIALS B Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	_____	_____	_____	__X__

The injection of reducing agents will not result in the generation of hazardous materials that would require off-site disposal. The de-chlorination process is conducted below ground surface. Therefore, no hazardous wastes are proposed for transport, use or disposal as part of the injection activities. (1)

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

Hydrogen Sulfide Gas and Vinyl Chloride Gas

The project site is impacted with VOCs. The use of the reducing agent whey mixture has proven to effectively remediate soil and groundwater contamination and not cause significant adverse environmental effects. Although it is unlikely, the project can potentially generate hydrogen sulfide and vinyl chloride gases. Therefore, air monitoring of hydrogen sulfide and vinyl chloride gases are required. In the event that hydrogen sulfide or vinyl chloride gases are detected above BAAQMD standards, the mitigation measures identified in 3(b) will be implemented.

Methane

Methane gas may also be generated during this project. Methane is not a constituent of concern in the BAAQMD air quality plan and therefore does not have an applicable standard. However, methane can potentially be produced at levels that can cause explosions and, therefore, levels of methane must be monitored to protect worker, and public health and safety. If levels of Methane are detected posing a threat to human health and safety, the mitigation measure identified in 3(b) will be implemented.

Vinyl Chloride

Although it is anticipated that vinyl chloride will result in groundwater as a by-product of the de-chlorination process, vinyl chloride itself will also be destroyed during remedial activities. Compliance with Monitoring and Reporting Program No. R1-2009-0067. Therefore, the generation of vinyl chloride in groundwater will be temporary and will not create a significant impact. Vinyl Chloride will be analyzed in groundwater during pre- and post injection monitoring events to and the injection formula will be modified to enable vinyl chloride destruction to avoid any significant increases in concentrations and/or migration in groundwater.

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

The nearest school is approximately one-quarter mile from the site. Hazardous emissions of hydrogen sulfide and vinyl chloride gasses are unlikely, and unlikely to extend that distance from the treatment area. No other emissions or the handling of hazardous or acutely hazardous materials, substances or waste is anticipated as part of this project. (1, 8, 14, 15) See 3b.

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

The project site is on the North Coast Regional Water Quality Control Board's Active Toxic Site List and the State Water Resources Control Board Geotracker Data Base (10). However, the project is anticipated to remediate identified hazardous materials and therefore will have a positive impact on the environment and public health and safety.

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

The project site is not located within an airport land use plan or within two miles of a public airport or public use airport. (1, 11)

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
The project is not located within the vicinity of a private airstrip. (1, 11)				
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	_____	_____	_____	__X__

The project would not impair implementation of, or physically interfere with an adopted Emergency Operations Plan. The project would not change existing traffic or circulation patterns, and would have no effect outside the project area. (1, 12)

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	_____	_____	_____	__X__

The project is not located in an area subject to wild land fires. (1, 9, 14)

8. HYDROLOGY AND WATER QUALITY -- Would the project:

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

Waste Discharge Requirements will be required for this project, and will be adopted by the Regional Water Board at the October 2009 board meeting. No violations of the water quality standards or the Draft Waste Discharge Requirements are anticipated to result from the project. The project will improve water quality conditions, and restore and protect the beneficial uses. (1, 2, 8, 13, 15)

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would	_____	_____	_____	__X__

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?				

Extraction of groundwater proposed as part of this project is limited to purging groundwater monitoring wells and will not substantially deplete groundwater supplies. There are no water supply wells in the immediate vicinity of the project. The project will remediate groundwater and restore the beneficial uses (1, 2, 5, 14, 15).

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

The project will not alter the existing drainage pattern. (1, 2, 8, 14)

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	_____	_____	_____	__X__

Refer to 8(c) above.

e) Create or contribute runoff water which would exceed the	_____	_____	_____	__X__

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				

This project will not create or contribute runoff. (1, 2, 14, 15)

f) Otherwise substantially degrade water quality?	_____	_____	__X__	_____

The addition of reducing agents to groundwater will change the existing water quality in the project area.

The addition of reducing agents has the potential to mobilize metals and will temporarily result in the production of breakdown VOCs, including vinyl chloride, through the reductive dechlorination process. The discharger shall comply with Monitoring and Reporting Program Order No. R1-2009-0067 that contains requirements for groundwater monitoring to evaluate the mobilization of metals and VOCs, and verify the return of pre-treatment water quality conditions minus the groundwater contaminants. The project of adding reducing agents to groundwater is designed to reduce groundwater toxicity and enhance cleanup of the aquifer. (1, 2, 5, 13, 14, 15, 22, 23). See 3b.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	_____	_____	_____	__X__

The project will not include any housing. The project is not located in a flood zone. (17)

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

The project is not within a 100-year flood hazard area. (17)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	_____	_____	_____	__X__

The project will not expose people or structures as a result of flooding or the failure of a levee or dam. (1)

j) Inundation by seiche, tsunami, or mudflow?	_____	_____	_____	__X__

The project site is not subject to seiche, tsunami or mudflow. (1)

9. LAND USE AND PLANNING - Would the project:

a) Physically divide an established community?	_____	_____	_____	__X__

The project would not physically divide a community because there is no planned construction activities proposed. (1, 2)

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	_____	_____	_____	__X__

See 9 (a) above. The project would not conflict with any applicable land use plan, policy, or regulation. (1, 5, 9, 14, 15)

c) Conflict with any applicable habitat conservation plan or	_____	_____	_____	__X__

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
natural community conservation plan?				

The project site is a shopping center. The project will not conflict with any applicable habitat conservation plan or natural community conversation plan (1, 18, 19)

10. MINERAL RESOURCES -- Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	_____	_____	_____	__X__

There are no mineral resources known to exist on the project site. (8)

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

Refer to 10 (a) above.

11. NOISE - Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	_____	_____	__X__	_____

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact

The project will not result in exposure of persons to or generation of noise levels in excess of standards. The noise from this project is limited to the mobile injection rig and diaphragm pump. The injection events are completed in two days. Injection events will take place monthly for two months, and quarterly thereafter for up to three years. The injections will occur during normal business hours in a commercial shopping center, parking lot and adjacent to the municipal right-of-way. (1, 9, 14)

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

The project would not generate excessive groundborne vibration. (1, 5, 14, 15)

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

The project will not create a permanent increase in ambient noise levels. See 11(a) above. (1, 9)

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

The project includes the use of a mobile injection rig and diaphragm pump for periodic injections. The increase in the noise level in the immediate area during the project will not be substantial, and will be of short duration. (1, 2, 14, 15)

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a	_____	_____	_____	__X__

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				

The project is not in the vicinity of a public or private airstrip. (1, 11)

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

The project is not in the vicinity of a private airstrip. (1, 9)

12. POPULATION AND HOUSING -- Would the project:

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

The project will have no direct or indirect effect on population. (1, 5, 14)

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

No housing will be displaced by the project. (1, 5, 14)

c) Displace substantial numbers of people, necessitating the construction of replacement	_____	_____	_____	__X__

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
housing elsewhere?				

No people will be displaced by the project. (1, 5, 14)

13. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire and police protection?	_____	_____	_____	__X__
b) Schools, parks or other public facilities?	_____	_____	_____	__X__

The police and fire departments will continue to provide service to the area. The project will have no effect on population or housing, and therefore no effect on schools, parks or other facilities. (1, 2)

14. RECREATION --

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
The project will not increase the use of existing neighborhood, regional parks, or any other recreational facilities, and will have no effect on park use. (1, 2)				
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	_____	_____	_____	__X__
See item 14(a) above.				
15. TRANSPORTATION/TRAFFIC -- Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	_____	_____	____	__X__
The project would not cause an impact on traffic. (1, 2)				
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	_____	_____	_____	__X__
The project will not exceed the level of service standard for designated roads or highways. (1,2)				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?	_____	_____	_____	__X__

The project would not cause a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. (1,2)

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

The project will not include hazardous design features or incompatible uses. (1, 2)

e) Result in inadequate emergency access?	_____	_____	_____	__X__

See item 7(g) above.

f) Result in inadequate parking capacity?	_____	_____	_____	__X__

The project will not result in inadequate parking. (1, 2)

g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	_____	_____	_____	__X__

The project does not affect alternative modes of transportation. (1, 2)

16. UTILITIES AND SERVICE SYSTEMS - Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	_____	_____	_____	__X__

The project does not include waste water treatment and will therefore, not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. (1, 5, 15)

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

The project would not require the construction of new water or wastewater treatment facilities. (1, 5, 15)

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	_____	_____	_____	__X__

The project would not require the construction of new storm water drainage facilities or expansion of existing facilities. (1, 5, 15)

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

Water service is available from the City of Santa Rosa to the G&G Shopping Center. (1)

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	_____	_____	_____	__X__

The project will not need to be served by the local waste water treatment provider. (1)

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

The project will not need to be served by a landfill. (1)

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

Refer to 16 (f), above.

17. MANDATORY FINDINGS OF SIGNIFICANCE --

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or	_____	_____	_____	__X__

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
eliminate important examples of the major periods of California history or prehistory?				

No fish, wildlife or plant species or habitat would be impacted by the project. As discussed in Section 5, the project would not eliminate important examples of major periods of California history or prehistory.

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

The injection of reducing agents, when viewed along with the other site activities, generates no significant cumulative impacts.

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

All potential direct and indirect impacts on the environment identified in this Initial Study have a “Less Than Significant Impact” with mitigations. Mitigation Measure 3 is compliance with Monitoring and Reporting Program Order No. R1-2009-0067, which contains requirements for groundwater and air monitoring, and a contingency plan in the event that BAAQMD air quality violations are detected. The project will accelerate the cleanup of groundwater and is expected to have direct positive effects to water quality and the environment. (1, 2, 5, 8, 14, 15, 16, 22, 23).

LIST OF REFERENCES

1. Regional Water Board staff evaluation based on review of the project and project description.

2. Regional Water Board staff evaluation of impact based on past experience.

3. California Scenic Highway Mapping System.

4. Bay Area Air Quality Management Districts, 2000 Clean Air Plan.

5. Other sites where similar technologies are performed.

6. City of Santa Rosa's Historic Preservation Program.

7. City of Santa Rosa's Zoning Map.

8. Regional Water Board files, Best Cleaners site file record.

9. City of Santa Rosa, General Plan.

10. California Environmental Protection Agency, North Coast Regional Water Quality Control Board Active Toxic Site List and State Water Resources Control Board GeoTracker Data Base.

11. Sonoma County Airport-Master Plan.

12. City of Santa Rosa, Emergency Operations Plan.

13. Draft Waste Discharge Requirements Order No. R1-2009-0066.

14. Edd Clark & Associates, Inc. Feasibility Study/Remedial Action Plan, January 25, 2007.

15. Edd Clark & Associates, Inc. Technical Support for Waste Discharge Requirements for the Injection of Whey Based Remediation to Groundwater, April 4, 2008.

16. Edd Clark & Associates, Inc. Air Quality Monitoring Plan, January 29, 2009.

17. FEMA maps.

18. Sonoma County Water Agency, Water Conservation Plan.

19. Santa Rosa Plain Conservation Strategy Team, Santa Rosa Plain Conservation Strategy- December 1, 2005.

20. California Agricultural LESA Worksheets.

21. Soil Survey for Sonoma County.

22. Edd Clark & Associates, Inc., Addendum to the Technical Support for Waste Discharge Requirements for the Injection of Whey Based Remediation to Groundwater, May 20, 2008.

23. Edd Clark & Associates, Inc., Additional Waste Discharge Requirements, February 6, 2009