

**DRAFT**  
**CEQA Guidelines Section 15183 Environmental Checklist**  
**College Creek Apartments Project**  
**2150 West College Avenue**  
**City of Santa Rosa, Sonoma County, California**

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## ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
µg/m <sup>3</sup>	micrograms per cubic meter
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	asbestos containing material
ADT	Average Daily Traffic
AFY	acre-feet per year
ALUC	Airport Land Use Commission
AMI	area median income
APEFZ	Alquist-Priolo Earthquake Fault Zone
APN	Assessor's Parcel Number
ARB	California Air Resources Board
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
c/mve	collisions per million vehicles entering
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAM	California Administrative Manual
CAP	Climate Action Plan
CBC	California Building Standards Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CNDDDB	California Natural Diversity Database
CNG	compressed natural gas
CO	carbon monoxide
CO <sub>2</sub> e	carbon dioxide equivalent
COC	contaminants of concern
dBA	A-weighted decibel
DEIR	Draft Environmental Impact Report
DPM	diesel particulate matter

du	dwelling unit
du/acre	dwelling unit per acre
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	greenhouse gas
GIS	Geographic Information System
GP	General Plan
HREC	Historic Recognized Environmental Condition
HVAC	heating, ventilation, and air conditioning
in/sec	inch per second
kBTU	kilo-British Thermal Units
kWh	kilowatt-hour
lbs	pounds
L <sub>dn</sub>	day/night average sound level
L <sub>eq</sub>	equivalent sound level
LHMP	Local Hazard Mitigation Plan
LID	Low Impact Development
L <sub>max</sub>	maximum noise/sound level
LNG	liquefied natural gas
LOS	Level of Service
LRA	Local Responsibility Area
LSA	Limited Subsurface Assessment
LTS	less than significant
LTSM	less than significant with mitigation
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MMRP	Mitigation Monitoring and Reporting Program
mph	miles per hour
MT	metric tons
NAHC	Native American Heritage Commission
NO <sub>x</sub>	oxides of nitrogen
NWIC	Northwest Information Center



OEHHA	California Office of Environmental Health Hazard Assessment
PAOC	Potential Areas of Concern
PCB	polychlorinated biphenyls
PD	Planned Development
PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM <sub>10</sub>	particulate matter, including dust, 10 micrometers or less in diameter
PM <sub>2.5</sub>	particulate matter, including dust, 2.5 micrometers or less in diameter
PPV	peak particle velocity
PRC	Public Resources Code
PV	photovoltaic
REC	Recognized Environmental Condition
ROG	reactive organic gases
SB	Senate Bill
SCCDC	Sonoma County Community Development Commission
SLCP	Short-lived Climate Pollutant
Sonoma Water	Sonoma County Water Agency
SRA	State Responsibility Area
State Water Board	California State Water Resources Control Board
SUSMP	Standard Urban Storm Water Mitigation Plan
SWPPP	Storm Water Pollution Prevention Plan
TAC	toxic air contaminant
TAZ	Traffic Analysis Zone
TIS	Traffic Impact Study
TPH-cc	total petroleum hydrocarbons carbon chain
UGB	Urban Growth Boundary
USFWS	United States Fish and Wildlife Service
UST	underground storage tanks
VOC	volatile organic compounds
WELO	Water Efficient Landscape Ordinance
WSA	Water Supply Assessment
W-Trans	Whitlock & Weinberger Transportation
ZEV	Zero Emission Vehicle

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## SECTION 1: INTRODUCTION

The College Creek Apartments Project (proposed project) proposes the demolition of three existing vacant buildings and the construction of three buildings consisting of 168 dwelling units, as well as a community center and surface parking on a 7.49-acre project site. The proposed project is within the boundaries of the Santa Rosa General Plan 2035 (General Plan), which encompasses all land within the City of Santa Rosa Urban Growth Boundary (UGB), totaling approximately 29,100 acres.

Pursuant to California Environmental Quality Act (CEQA) Guidelines, (Public Resources Code [PRC] § 21000, *et seq.*), an Environmental Impact Report (EIR) and a Mitigation Monitoring and Reporting Program (MMRP), was prepared and certified by the Santa Rosa City Council in November 3, 2009 (General Plan 2035 Final Environmental Impact Report [FEIR] State Clearinghouse No. 2008092114). This document will be referred to as the General Plan FEIR throughout this environmental checklist.

The purpose of the following environmental checklist is to evaluate the proposed project's conformance with the analysis and conclusions of the General Plan FEIR, and to determine whether the project would result in new significant impacts or substantially more severe impacts under CEQA Guidelines Section 15183 that were evaluated and disclosed in the General Plan FEIR.

The following Environmental Checklist has been prepared pursuant to CEQA Guidelines Section 15183 (Projects Consistent with a Community Plan or Zoning) to determine if the proposed project requires additional environmental review. CEQA Guidelines Section 15183 mandates that projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an FEIR was certified (in this case the General Plan FEIR) shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects that are peculiar to the project or its site.

### 1.1 - Summary of Results

As illustrated by the following Environmental Checklist, the proposed project is found to be in conformance with the analysis and conclusions of the General Plan FEIR. This determination supports the design review approval of the proposed project and is based on the following criteria:

1. There are no new significant effects peculiar to the proposed project or its site;
2. There are no new significant effects that were not previously evaluated in the General Plan FEIR;
3. There are no new significant off-site or cumulative impacts that were not analyzed in the General Plan FEIR, and
4. There are no adverse impacts that are more severe than those previously identified in the General Plan FEIR.

Neither of the mitigation measures identified in the General Plan FEIR (Mitigation Measure 4.D-4 and Mitigation Measure 4.F-5) are applicable to the proposed project, as described in each

environmental topic. This evaluation concludes that the proposed project is within the scope of the General Plan FEIR, and that no further CEQA documentation is required.

The General Plan FEIR is available at:

City of Santa Rosa  
City Hall  
100 Santa Rosa Avenue  
Santa Rosa, CA 95404  
<https://srcity.org/392/General-Plan>

## SECTION 2: PROJECT DESCRIPTION

### 2.1 - Project Location and Setting

#### 2.1.1 - Project Location

The project site is located at 2150 West College Avenue in the City of Santa Rosa, in Sonoma County, California; Assessor's Parcel Number (APN) 010-320-029 (Exhibit 1). As shown in Exhibit 2, the 7.49-acre (gross) property contains a portion of College Creek, which runs along the southern and eastern boundary of the site. West College Avenue forms the site's northern boundary, while the California Department of Forestry and Fire Protection (CAL FIRE) Santa Rosa Station abuts the site to the west. Across College Creek to the east is the City of Santa Rosa Fire Department training facility (as part of CAL FIRE), while to the south across College Creek is a stormwater basin and utilities facility managed by the City of Santa Rosa. The project site is located on the *Sebastopol, California* United States Geological Survey (USGS) 7.5-minute Topographical Quadrangle Section 21, Township 7 North, Range 8 West Mount Diablo Baseline and Meridian (approximate Latitude 38° 26' 41" North; Longitude 122° 45' 17").

#### 2.1.2 - Site Background

In 1981, the site was acquired by Sonoma County Water Agency (Sonoma Water) for its operation center. In 2008, Sonoma Water explored the possibility of redeveloping the site for medium/High-Density workforce housing and submitted a formal request to the City of Santa Rosa for a change in the land use designation from Public Institutional to Medium High-Density Residential. The land use designation change was evaluated as part of the 2009 City of Santa Rosa General Plan Housing Element update and the designation change for the site was included in the Santa Rosa General Plan 2035 (General Plan). In September 2013, the Planning Commission initiated a rezoning of the site from PD-0196 (Planned Development) to R-3-30 (Multi-family Residential), to be consistent with the General Plan.

In March 2014, the County Board of Supervisors declared the property as surplus. In June 2017, the Board of Supervisors authorized the sale of the property to the Sonoma County Community Development Commission (SCCDC). The property was marketed for development by the SCCDC through a lengthy proposal process. In December 2018, USA Properties was selected as the preferred developer with approval from the Board of Supervisors to enter into an Exclusive Right to Negotiate Agreement for the entitlement of a mixed-income residential community.

#### 2.1.3 - Land Transfer

The SCCDC is in negotiations to convey 2150 West College Avenue to USA Properties Fund, Inc., a California Corporation. The negotiations include the potential planning, design, construction and long-term management of a mixed income community on the property.

#### 2.1.4 - Existing Development and Land Use Activities

Sited on the property are a collection of three vacant buildings, including maintenance shops, offices and a small garage, as well as associated parking lots that were formerly used by Sonoma Water. As

shown in Exhibit 3a and Exhibit 3b, the site contains overgrown vegetation with chain link fencing along the site boundaries. Ornamental trees planted on-site include elm, glossy privet, apple, sycamore, tulip tree, ponderosa pine, red gum eucalyptus, cedar, olive, and liquid amber.

College Creek is located along the eastern and southern project site boundaries and contains a riparian corridor with mature valley oaks.<sup>1</sup> A pedestrian path is located along the western bank of College Creek. Section 20-30.040(D)(3) of the Municipal Code regulates man-made and channelized waterways under the control of Sonoma Water such as College Creek within the boundaries of the project site. Developable land on the 7.49-acre parcel is approximately 5.829 acres, reflecting the apportionment of a creek trail and a creek maintenance easement dedication.

The property is located in a mixed commercial and residential neighborhood. A transit transfer center with three bus lines is adjacent, providing readily accessible high-frequency public transportation to residents of this proposed community. Additional features include the Finley Community Center and Finley Community Park within one block of the property.

### 2.1.5 - General Plan and Zoning Designations

The General Plan designates the project site as Medium High-Density Residential (Exhibit 4). This designation is intended for a range of housing options including multifamily developments with allowable densities between 18 and 30 dwelling units per gross acre.<sup>2</sup> The Santa Rosa Zoning Code zones the project site R-3-30 (Multi-family Residential) (Exhibit 5). The R-3-30 zoning allows for multi-family residential development and a maximum 45-foot building height. The minimum number of square feet of gross site area for one dwelling unit is 1,450 square feet.<sup>3</sup>

## 2.2 - Project Background and Previous Environmental Review

### 2.2.1 - General Plan

The General Plan is a long-range plan that, “addresses issues related to physical development, growth, transportation services, public facilities, community design, energy efficiency, greenhouse gas reduction strategies, and conservation of resources in the Planning Area.”<sup>4</sup> The General Plan provides a framework for development that dictates decisions on how to grow, provide public services and facilities, and protect and enhance the environment. Pursuant to California law, the General Plan is comprehensive, internally consistent, and long-range. The General Plan was adopted by the Santa Rosa City Council in 2009. As described above, the project site was designated Medium High-Density Residential as part of the General Plan. In September 2013, the Planning Commission initiated a rezoning of the site from PD-0196 (Planned Development) to R-3-30 (Multi-family Residential), to ensure consistency between the zoning for the site and its land use designation under the General Plan.

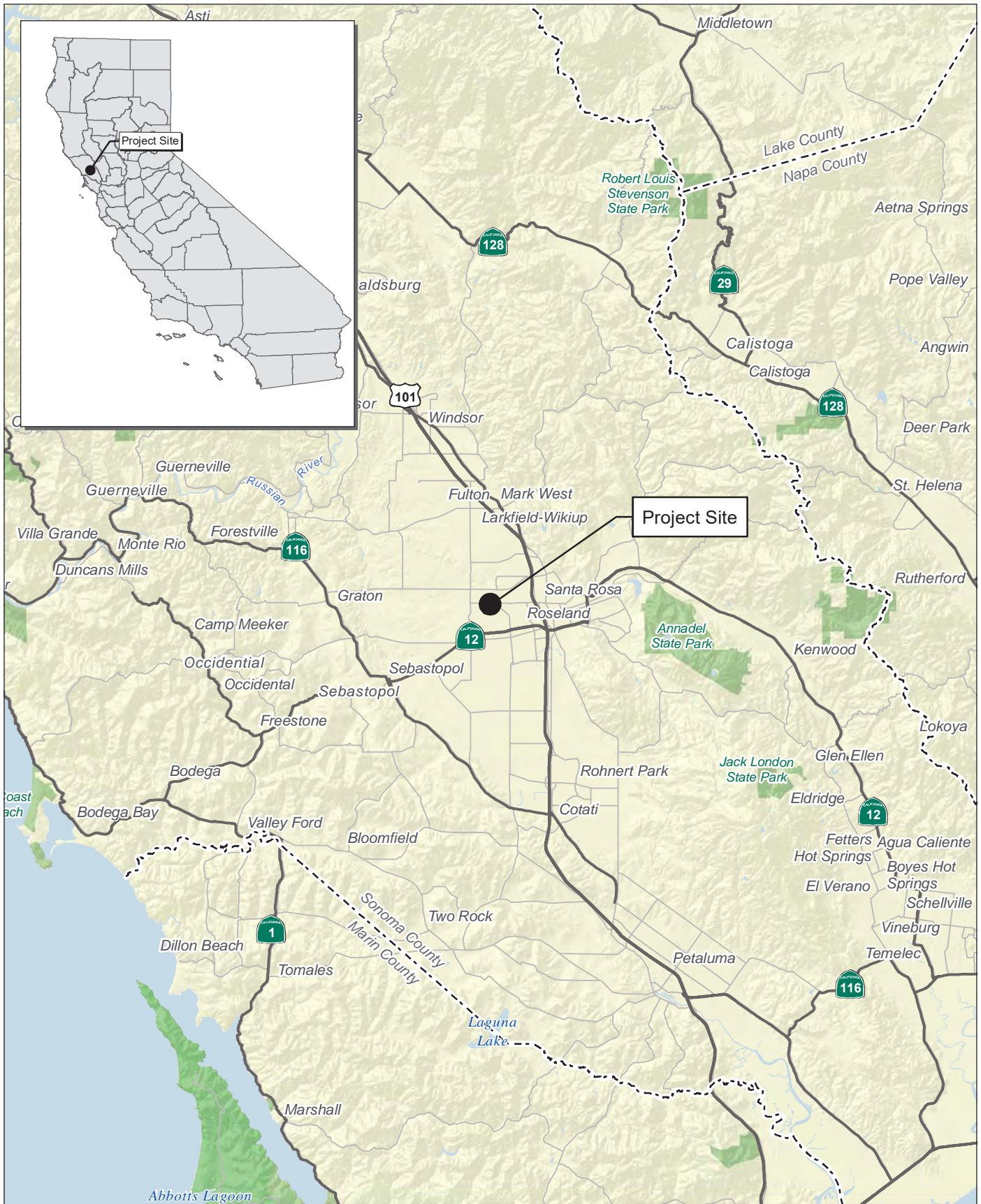
<sup>1</sup> Monk & Associates. 2019. Biological Resources Constraints Analysis. March.

<sup>2</sup> City of Santa Rosa. 2009. Santa Rosa General Plan 2035. Page 2-10. November.

<sup>3</sup> City of Santa Rosa. City of Santa Rosa Zoning Code, Table 2-3—Residential Zoning District Parcel Size and Density. Website: [http://qcode.us/codes/santarosa/view.php?topic=20-2-20\\_22-20\\_22\\_040&frames=on](http://qcode.us/codes/santarosa/view.php?topic=20-2-20_22-20_22_040&frames=on). Accessed October 31, 2019.

<sup>4</sup> City of Santa Rosa. 2009. Santa Rosa General Plan 2035. Page 1-3. November.





Source: Census 2000 Data, The CaSIL

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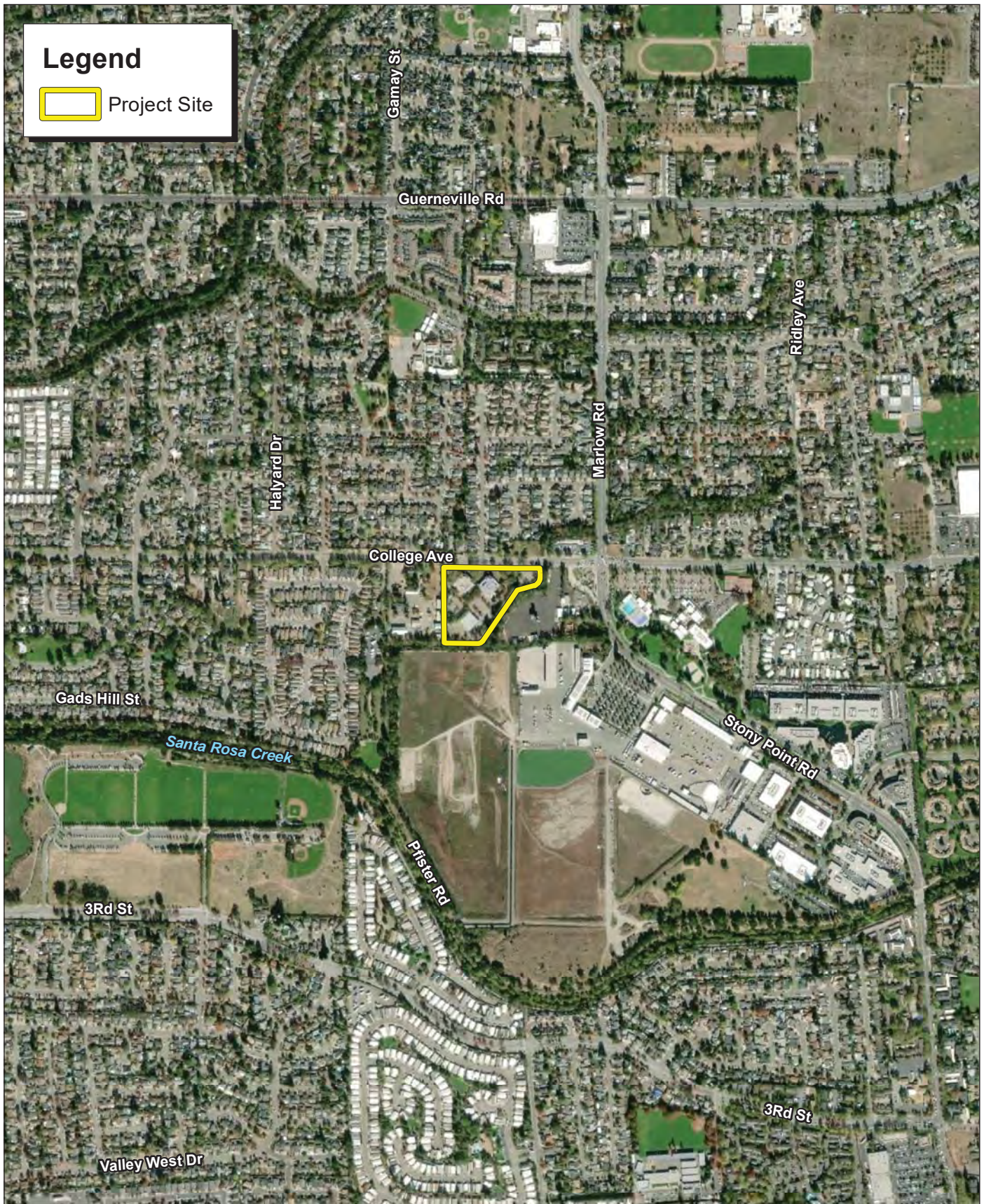


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## Exhibit 1 Regional Location Map

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Source: ESRI Aerial Imagery.

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## Exhibit 2 Local Vicinity Map



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Photograph 1: Southern-facing view of the northwestern-most commercial building referred to as the former Sonoma County Water Agency Administrative Office Building.



Photograph 2: Southwestern-facing view of the northeastern-most commercial building referred to as the former Sonoma County Water Agency Operations & Maintenance Building.



Photograph 3: Southern-facing view of the southern-most commercial building referred to as the Sonoma County Water Agency Service Center Building.



Photograph 4: Western-facing view of the western-most commercial building referred to as the former Sonoma County Water Agency Garage Building.

Source: Krazan Site Development Engineers, March 2019.

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## Exhibit 3a Project Site Photos

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Photograph 5: Southeastern-facing view of the paved parking lot located in the northeastern portion of the subject site.



Photograph 6: Northwestern-facing view of the paved parking lot located in the central portion of the subject site.



Photograph 7: Northeastern-facing view of the paved parking area located in the northwestern portion of the subject site.

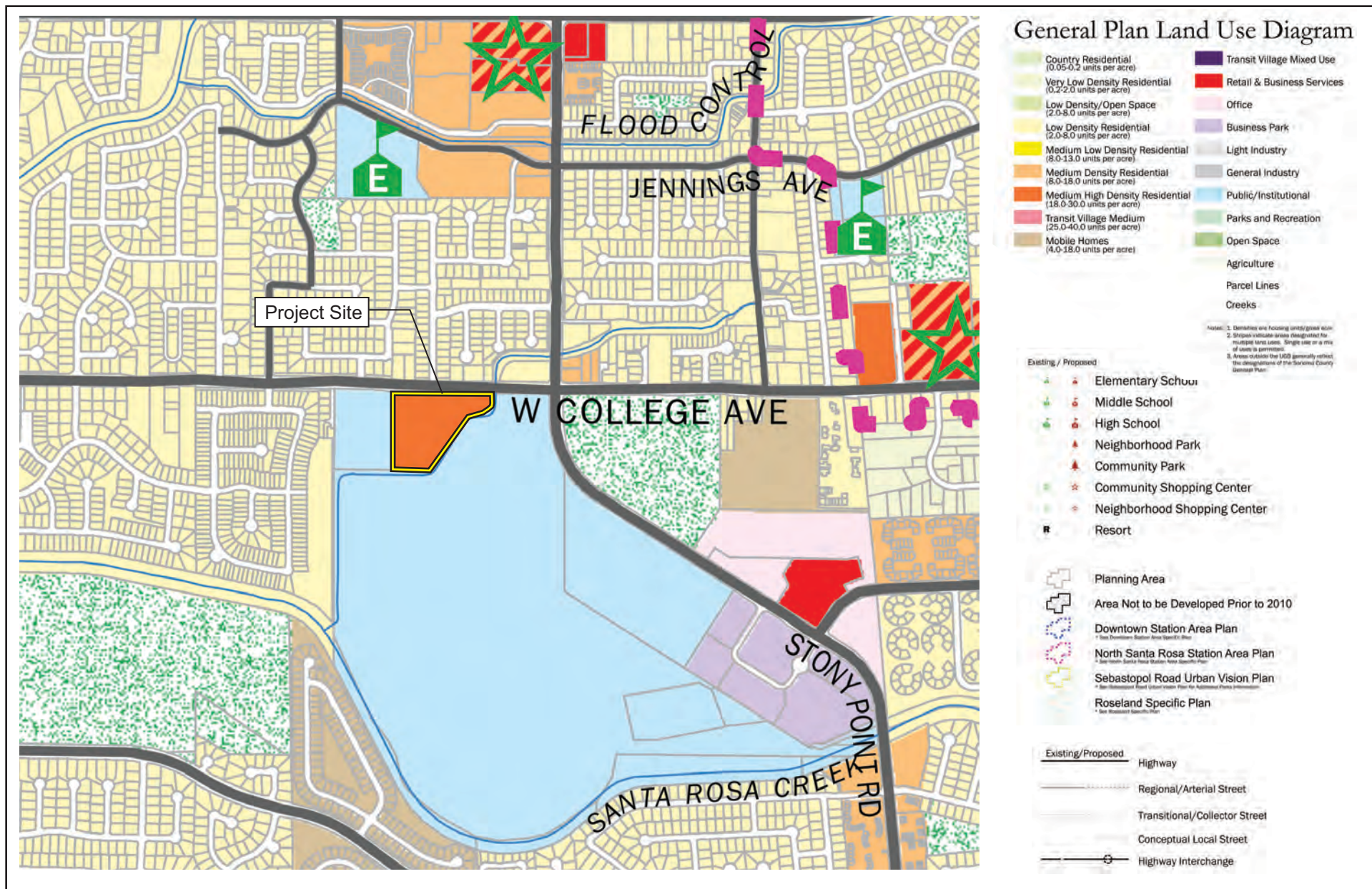


Photograph 8: Eastern-facing view of the northwestern and central-northern portions of the subject site adjacent to West College Avenue.

Source: Krazan Site Development Engineers, March 2019.

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Source: City of Santa Rosa General Plan Land Use Map, July 2019.

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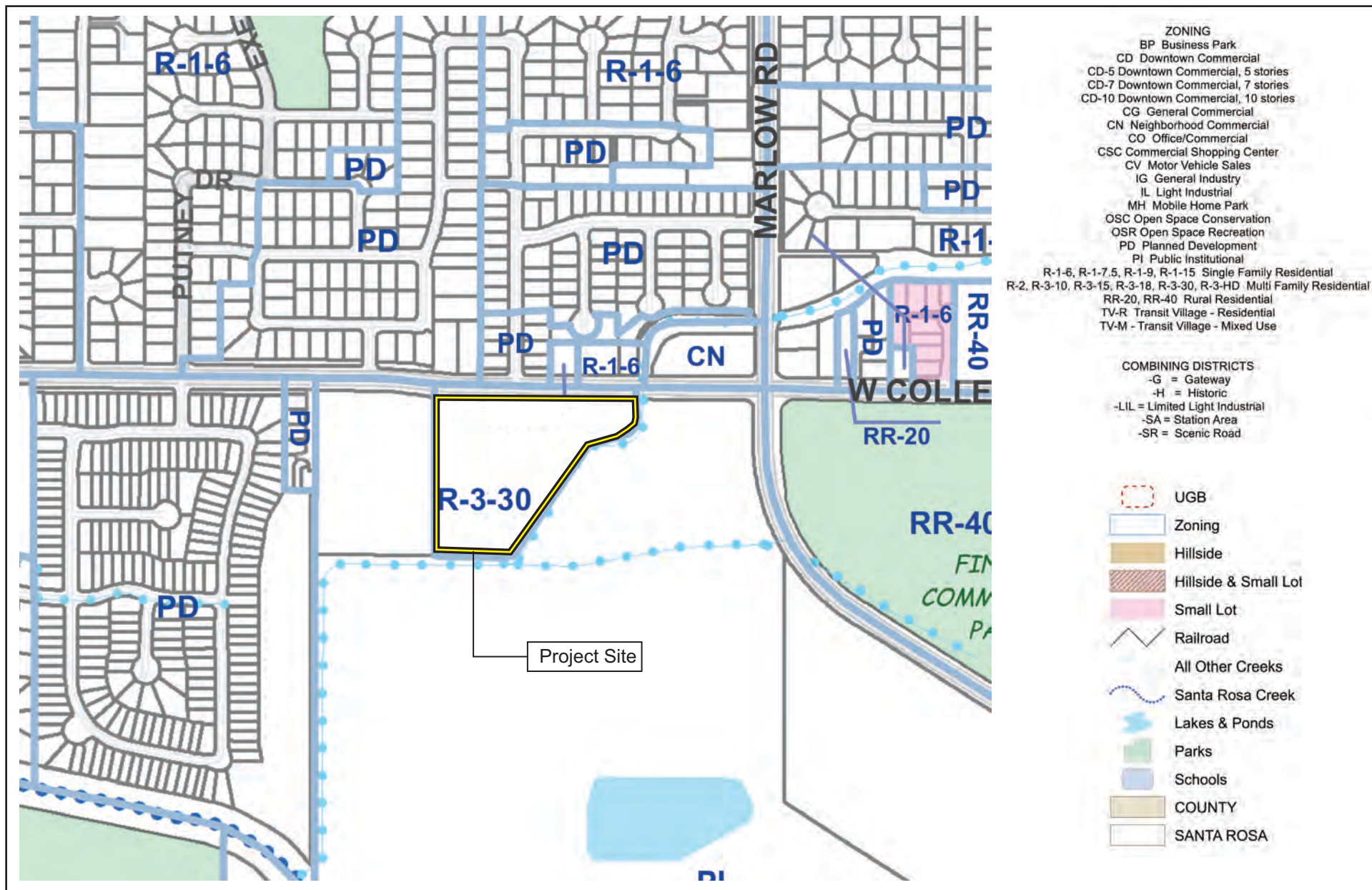
## Exhibit 4 Existing General Plan Land Use Designation

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Source: City of Santa Rosa Zoning Map, August 2015.

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## Exhibit 5 Existing Zoning Code Designation

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## 2.2.2 - General Plan Environmental Impact Report

The City prepared a Program EIR for the General Plan and certified the General Plan FEIR in 2009. The General Plan FEIR identified significant environmental effects that could result from implementation of the General Plan as well as ways the impacts could be reduced to less than significant implementation of General Plan policies and mitigation measures. It also identified significant and unavoidable environmental impacts related to transportation and circulation, air quality, and climate change. The General Plan FEIR's conclusions are listed in Section 4, Environmental Analysis, of this document.

## 2.3 - Project Description

### 2.3.1 - Development Summary

The project site is 7.49 acres (gross) with 1.67 acres of the parcel reserved for an exclusive easement to Sonoma Water for flood channel maintenance associated with College Creek, and public right-of-way dedication for the creekside pedestrian trail. The remaining 5.82 acres would be developed with three residential buildings with a total of 168 dwelling units, community center, pool, and other amenities (Exhibit 6a).

The proposed project also includes an application to subdivide the existing parcel into three parcels for the purposes of securing phased financing, if needed. The developable area for residential construction would be divided into two lots: Lot 1 (1.47 acres) with two multifamily buildings and Lot 2 (4.35 acres) with one multifamily building and amenities. The remainder area would consist of approximately 1.67 acres and is identified as the existing Sonoma Water easement. This area will be Lot 3 and is planned for future dedication to Sonoma Water. The Tentative Parcel Map is shown in Exhibit 6b. The proposed project would be operated as a single community.

The College Creek easement provides approximately 30 feet of protection on either side of the creek centerline as shown in Figure 3 of the Biological Resources Report. The proposed project would maintain a 10-foot setback from the College Creek easement boundary (excluding the trail connection, which would be within the easement boundary). The project proposes to extend the existing creek trail to formally connect at West College Avenue, along the eastern project site boundary. This trail connection would be within the easement boundary. This connection was envisioned by the City in their Citywide Creek Master Plan.<sup>5,6</sup> Table 1 summarizes the proposed project components.

**Table 1: Project Components**

Project Portion	Acreage	Description
Buildings A, B, and C (includes all proposed project development outside the creek area)	5.82	168 dwelling units within Buildings A, B, and C; Bike Storage Enclosure; Community Center;

<sup>5</sup> City of Santa Rosa. 2013. Santa Rosa Citywide Creek Master Plan. April.

<sup>6</sup> City of Santa Rosa. No date. Creek Trails of Santa Rosa. Website: <https://srcity.org/DocumentCenter/View/8501/Creek-Trails-Map-PDF?bidId=>. Accessed December 24, 2019.

Project Portion	Acreage	Description
		Covered barbeque area; pool; children's play area; surface level parking.
Creekside easement	1.67	Exclusive easement to Sonoma Water for stormwater channel construction and maintenance. Easement area includes an initial offer document to the City of Santa Rosa for a creekside trail that extends the full length of the creek.
<b>Total</b>	7.49	—

Source: USA Properties Fund 2019.

## Residential Uses

The proposed project would include 168 units in three buildings (Building A, Building B, Building C) with a mix of 1-, 2-, and 3-bedroom units ranging in size from 622 to 1,141 square feet. Unit mix includes 70 one-bedroom, 83 two-bedroom, and 15 three-bedroom units. In total, the proposed project would provide 28.9 dwelling units per acre. The proposed project will be consistent with the City's Housing Allocation Plan with no less than 15 percent of the units available to households with income at or below 80 percent Area Median Income. The total income range for apartment homes is expected to range from 35 percent to 120 percent Area Median Income.

## Amenities

The proposed project would include a Community Center on the ground floor of Building C. The Community Center would include the leasing office, common areas, fitness room, mail room, and package lockers. A clubroom with hospitality kitchen, large screen television, billiards table, and Wi-Fi workstations are also planned within the Community Center. Outdoor amenities would include a pool with lounge chairs, barbeque counter with seating, children's play area, bike repair station, and a pet wash station.

## Employment

The proposed project would be staffed by four full-time employees who would work on-site once the proposed project is completed and fully occupied; two of the employees would live on-site.

### 2.3.2 - Design and Appearance

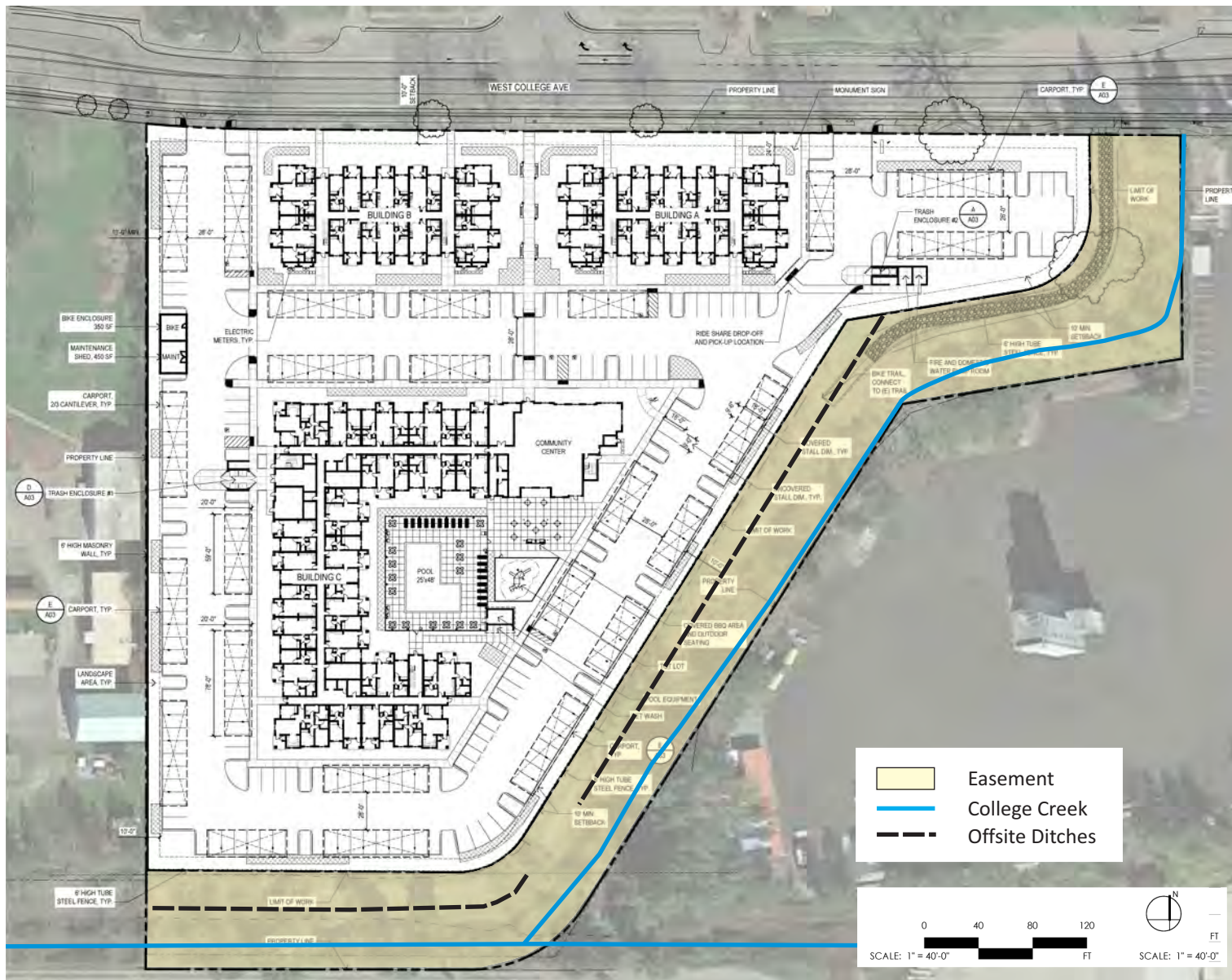
The architectural design for the buildings utilizes simple forms with contemporary architecture. The three buildings would be a maximum of 45 feet tall with varying roofline decorative facades to conceal roof-mounted equipment. The overall architectural aesthetic includes a mix of modern design elements, including earth tones and natural colors (Exhibit 7a and Exhibit 7b). A variety of materials including horizontal fiber cement siding, board-and-batten fiber cement siding, and plaster would be used throughout the proposed project to articulate the building surfaces and to provide variety in the texture of the building elements. Apartment structures would include metal awnings, tube steel deck railings, and balcony elements to provide a natural element to the design. Throughout the proposed project, natural colors and earth tones are proposed for the stucco base and siding features.

### 2.3.3 - Landscaping

Proposed project landscaping would include low-profile shrubs and grasses that would provide groundcover and would be compatible with bioretention areas as shown in Exhibit 8. The proposed project would provide landscaping adjacent to all parking areas, buildings, and walkways in accordance with the City's Design Guidelines.

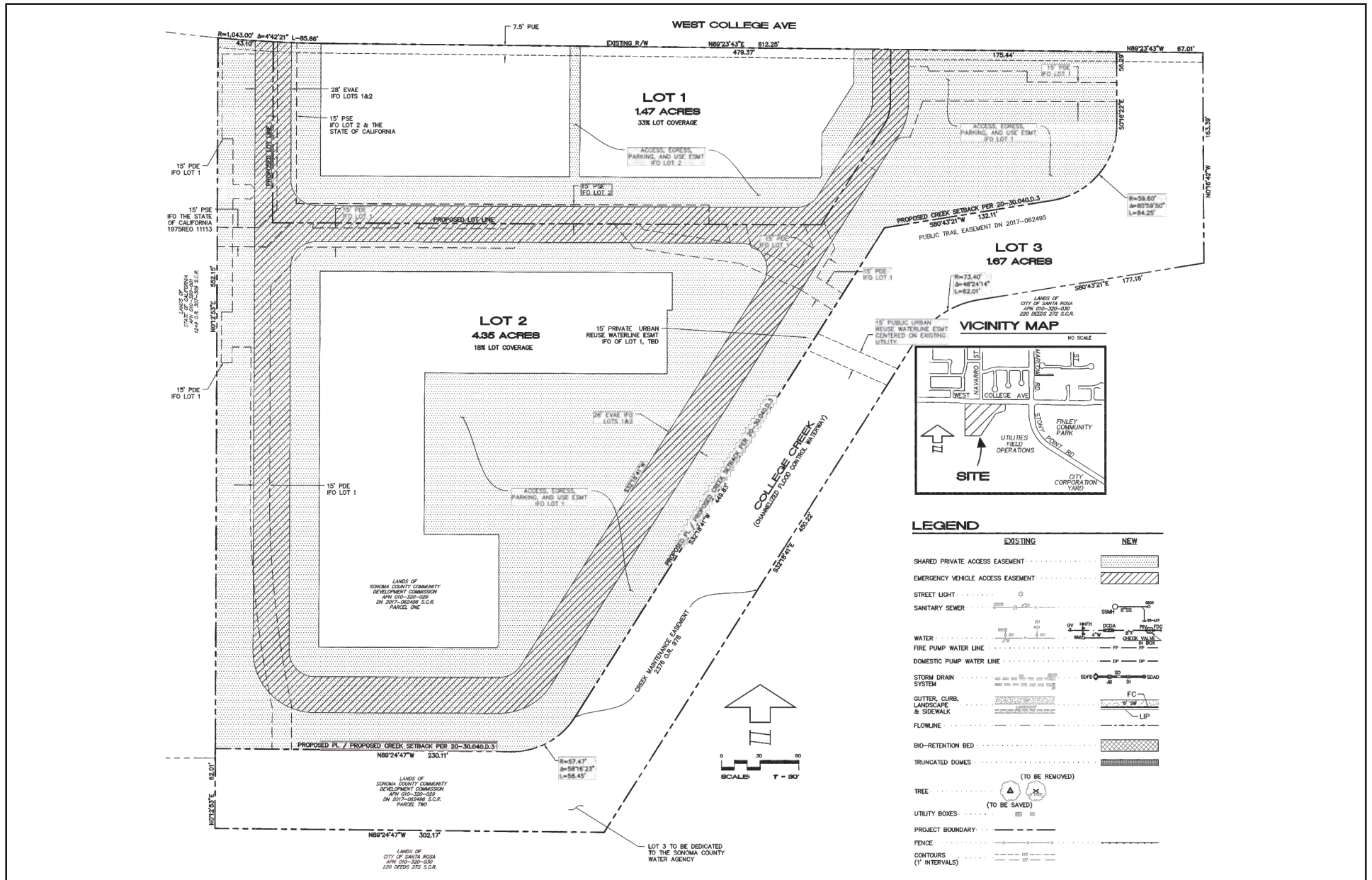
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Source: Civil Design Consultants, Inc., August 2020.

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**Exhibit 6b**  
**Tentative Parcel Map**

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Source: Integra Planning & Landscape Architecture, 7/29/2019.

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## Exhibit 7a Project Conceptual Rendering

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COLLEGE CREEK APARTMENTS PROJECT  
CEQA GUIDELINES SECTION 15183 ENVIRONMENTAL CHECKLIST

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STUCCO FINISH



CORNICES



ACCENT STUCCO & BOARD + BATTEN



CORNER WINDOW TRIM



HORIZONTAL SIDING



TRIM



MAIN STUCCO



ACCENT STUCCO & ADMIN STUCCO



CANOPIES + RAILINGS



HARDIEPANEL VERTICAL SIDING BOARD AND BATTEN



LOUVERED CANOPIES



HARDIEPANEL HORIZONTAL SIDING



1X1 TUBE STEEL RAILING

Source: Integra Planning & Landscape Architecture, 7/29/2019.

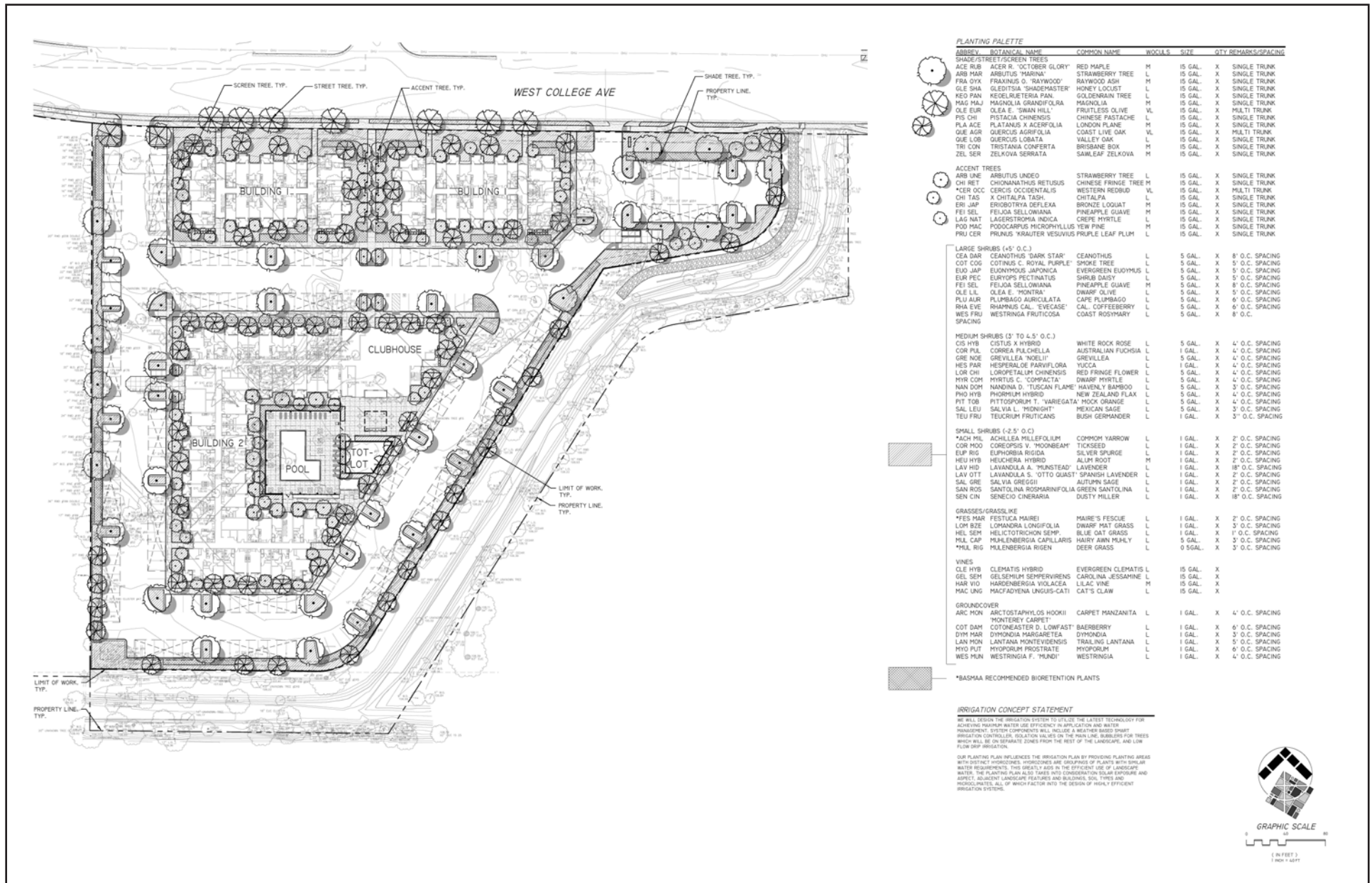
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## Exhibit 7b Project Materials and Colors

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CEQA GUIDELINES SECTION 15183 ENVIRONMENTAL CHECKLIST

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Source: Integra Planning & Landscape Architecture, 7/30/2019.

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### 2.3.4 - Fencing and Gates

The proposed project design includes 6-foot-high tube steel fencing along the eastern and southern boundaries of the developable area.

While masonry type walls are typically used to separate non-residential and residential properties, the project applicant will work with the City to determine the appropriate fencing for the western boundary adjacent to the CAL FIRE Santa Rosa Station.

### 2.3.5 - Circulation

#### Vehicular Circulation

Vehicular access would be from two driveways on West College Avenue. An internal loop driveway would provide access to residential buildings and a ride-share drop-off/pick up location is also planned at the eastern entrance.

The proposed project would include restriping the section of West College Avenue from west of Putney Drive to Stony Point Road to provide a single eastbound through lane and accommodate a center left-turn lane (improvements are shown in Appendix A).

#### Pedestrian Access

Pedestrian access would be taken from several entrances on West College Avenue via existing sidewalks. The western entry would lead to the leasing offices and clubhouse as well as provide entry for residents. The project would include the installation of an enhanced crosswalk at the intersection of West College Avenue/Navarro Street, including Rectangular Rapid-Flashing Beacons as shown in Appendix A.

The proposed project would include pedestrian walkways throughout the project site. In addition, the existing creekside trail would be extended north to West College Avenue, as shown in Exhibit 6a. The trail is proposed to be constructed with compacted gravel to match the material used for the existing trail. The project applicant would coordinate with Sonoma Water and the City of Santa Rosa in completing the trail segment.

### 2.3.6 - Parking

The proposed project would provide a total of 272 parking spaces with a mix of covered and uncovered spaces available for residents and their guests; 15 percent of the spaces (41 spaces) would be electric vehicle charging stations.

The proposed project would include 84 enclosed bike parking spaces in multiple on-site locations including an enclosed structure located on the western boundary of the project site and dedicated storage rooms in Building C. In addition, the proposed project will include 14 short-term bike stalls located throughout the project site for a total of 98 bike parking spaces.

### 2.3.7 - Energy Saving Design Features

The proposed project would be designed to incorporate elements from the City of Santa Rosa's Climate Action Plan (CAP), City of Santa Rosa's California Green Building Standards Code (CALGreen) requirements, and CALGreen 2020 Tier 1 Standards. These features include energy and water efficient design measures including: (1) incorporating solar power design, (2) the installation of several electric charging stations in the parking area, and (3) water efficient landscaping consisting of drought tolerant plant species separated into hydro-zones for irrigation needs. The proposed project would include high efficiency lighting, energy efficient appliances, and low-flow plumbing faucets and fixtures.

### 2.3.8 - Utilities

#### Water and Wastewater

As shown in Exhibit 9, the proposed project would include new potable water and sanitary sewer lines throughout the project site. The proposed project would connect to an existing sanitary sewer line within West College Avenue and would install a new sanitary sewer manhole. Additionally, the proposed project would include new fire hydrants along the West College Avenue frontage.

#### Storm Drainage

New storm drain lines would be located throughout the site that would collect stormwater and convey runoff to on-site bioretention areas. The proposed storm drain lines would tie into four existing storm drain outfalls located along the southern and eastern boundary of the project site and drain to College Creek.

#### Natural Gas and Electricity

There are no overhead power lines on-site but there are overhead power lines directly adjacent to the project site on the north side of West College Avenue. The proposed project would be served with on-site solar systems and electricity generated by Sonoma Clean Power and delivered by Pacific Gas and Electric Company (PG&E).<sup>7</sup>

#### Telecommunications

Telecommunications providers own and operate infrastructure, such as cellphone towers and fiber optic cables, within the City of Santa Rosa. Existing telecommunication providers such as AT&T and Xfinity may provide internet and phone service to the project site.

### 2.3.9 - Phasing and Construction

The proposed project would be constructed in one phase over a period of 17 months (1.4 years) including demolition of existing improvements starting in July 2021 and ending in December 2022. All demolition of existing structures, site preparation, and grading for the entire project area would also be completed at this time. During site preparation, approximately 4,070 cubic yards would be cut, approximately 2,270 cubic yards would be used for fill material, and approximately 1,800 cubic yards would be exported from the site. As specific construction schedules and detailed information is not known at this time, conservative default assumptions will be used for purposes of analyzing and modeling construction durations and equipment.

<sup>7</sup> Sonoma Clean Power. 2019. Frequently Asked Questions. Website: <https://sonomacleanpower.org/frequently-asked-questions>. Accessed October 31, 2019.



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### 2.3.10 - Land Use Designations and Zoning

The proposed project would maintain the existing land use designation and zoning. The General Plan designates the project site as Medium High-Density Residential and the Santa Rosa Zoning Code zones the project site R-3-30.

### 2.3.11 - Tree Removal and Building Demolition

Tree removal would occur outside the breeding/nesting season for migratory birds (typically February 1 through August 31). If construction cannot be scheduled to begin outside the nesting season, the project applicant will retain a qualified Biologist to conduct pre-construction surveys for raptors and other migratory birds within the construction area, including a 150-foot survey buffer, no more than 15 days prior to the start of ground disturbing activities in the construction area. If required for protection of an active nest, the qualified Biologist will, in accordance with State and/or federal regulations, delineate a buffer around nests using nest buffer signs, environmentally sensitive fencing, pin flags, and or flagging tape. The buffer zone will be maintained around the active nest site(s) until the young have fledged and are foraging independently.

To protect any nesting or roosting bats, the project applicant will retain a qualified Bat Biologist to survey trees and buildings to be disturbed by project operations. The surveys will be conducted 15 days prior to commencing with any demolition or removal. If no special-status bats are found during the surveys, then no further action is needed. If special-status bats species are found on the project site, the project applicant will retain a qualified Biologist to make a determination regarding whether there are young bats present. If young are found roosting in any tree or building, impacts to the tree or building shall be avoided until the young have reached independence as determined by the qualified Biologist. In accordance with State and/or federal regulations, a non-disturbance buffer along with fencing will be established around the maternity site. A qualified Bat Biologist will determine the size of the buffer zone at the time of the surveys. If adults are found roosting in a tree or building on the project site but no maternal sites are found, then the adult bats can be flushed or a one-way eviction door may be placed over the tree cavity or building access opening prior to the time the tree or building would be removed or disturbed.

## 2.4 - Discretionary Approvals

The project as proposed is conforming to the General Plan Land Use Designation and Zoning. The proposed project requires the following discretionary approvals from the City of Santa Rosa:

- Major Design Review
- Tentative Parcel Map

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## SECTION 3: CEQA GUIDELINES SECTION 15183: PROJECTS CONSISTENT WITH A COMMUNITY PLAN OR ZONING

CEQA Guidelines Section 15183 establishes that projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an FEIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects that are peculiar to the proposed project or its site. Section 15183 streamlines the review process and reduces the need to prepare repetitive environmental studies.

### Proposed Project Qualifies for No Further Environmental Review under CEQA Guidelines Section 15183

CEQA Section 15183 applies to the proposed project since it meets the requirements of Section 15183(d)(1) and (d)(2) as set forth below:

**(d)(1)(B) The project is consistent with a zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development.**

The project site is zoned R-3-30 (Multi-family Residential) by the Santa Rosa Zoning Code (Exhibit 5). The R-3-30 zoning district is intended for medium and higher density residential development that provides a full range of choices in housing types and to improve access to affordable housing. In addition, the R-3-30 zoning districts implement and are consistent with the Residential—Medium Density and Medium High-Density land use classifications of the General Plan.<sup>8</sup> The proposed project's residential development would fit this designation as the proposed project would include three apartment buildings with a total of 168 dwelling units on 5.82 acres of developable land. The proposed project would include affordable and market rate housing units for a density of 28.9 dwelling unit per acre (du/acre), consistent with the allowable housing density of the General Plan. Consistent with Table 2-2 of Chapter 20-22 of the Santa Rosa City Code, the proposed project's multi-family use would be a permitted use.

**(d)(1)(C) The project is consistent with the General Plan of a local agency.**

The General Plan designates the project site Medium High-Density Residential, which allows for 18 to 30 du/acre. The project site is 7.49 acres with 1.67 acres of the parcel reserved for an exclusive easement to Sonoma Water for flood channel maintenance and public right-of-way dedication for a partially existing creek-side pedestrian trail. The remaining 5.82 acres would be developed with three residential buildings with a total of 168 dwelling units. As a result, the proposed project's 28.9 du/acre density is within the allowable use of the Medium High-Density Residential designation.

<sup>8</sup> City of Santa Rosa. Santa Rosa City Code, Title 20 Zoning. Website: [http://qcode.us/codes/santarosa/view.php?topic=20-2-20\\_22-20\\_22\\_020&frames=on](http://qcode.us/codes/santarosa/view.php?topic=20-2-20_22-20_22_020&frames=on). Accessed December 6, 2019.

The City Council has the ultimate discretion to determine whether the proposed project would be considered consistent with the General Plan. While there are no General Plan policies particular to the project site, there are a number of policies applicable to the Downtown District that are applicable to the proposed project including the following:

**LUL-E-2:** As part of planning and development review activities, ensure that projects, subdivisions, and neighborhoods are designed to foster livability.

**Connections.** Neighborhoods should be well connected to local shops and services, public plazas and gathering places, park lands, downtown, schools, and recreation by adequate and safe streets, bike lanes, public pathways, trails, general infrastructure (e.g., sidewalks and crosswalks), and transit.

**Project Analysis:** The proposed project would connect the existing pedestrian trail along College Creek to West College Avenue, which would create a new publicly accessible entrance to trail. The project site is adjacent to existing bike lanes, sidewalks, and streets, and would be connected to this existing infrastructure. The project site is located within 0.5 mile of existing commercial retail uses, the Finely Community Center, and transit connections. As a result, the proposed project would foster livability because it would be connected to local shops and services via existing general infrastructure and would also provide a new connection to an existing trail.

**LUL-F-2:** Require development at the mid-point or higher of the density range in the Medium and Medium High-Density Residential categories. Allow exceptions where topography, parcel configuration, heritage trees, historic preservation or utility constraints make the mid-point impossible to achieve.

**Project Analysis:** The proposed project's 28.9 du/acre density is within the allowable 18 to 30 du/acre density range established for the Medium Density Residential designation, and is at the high end of this density range.

**UD-E-1:** Provide for new open space opportunities throughout the City, especially in neighborhoods that have less access to open spaces. This includes exploring potential for creek corridors, bicycle and pedestrian ways, as well as new public plazas, gathering places, and conservation areas.

**Project Analysis:** The proposed project would connect the existing creekside trail along College Creek north to West College Avenue creating a new pedestrian facility linkage that would be more accessible for the public.

**(d)(2) An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.**

The General Plan FEIR provided the public and responsible trustee agencies with information about the probable environmental effects of adoption and implementation of the comprehensive update for the General Plan. The General Plan FEIR identified policies and implementation programs within the General Plan that mitigate those effects as well as any additional necessary mitigation measures



to minimize significant impacts to the environment. The City of Santa Rosa adopted the Santa Rosa General Plan 2035 and certified the General Plan FEIR on November 3, 2009.

The project site is included in the planning area of the adopted General Plan and the potential development of the site in accordance with the designated land use was considered as part of the General Plan FEIR.

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## SECTION 4: ENVIRONMENTAL CHECKLIST

CEQA Guidelines Section 15183(b) states that:

In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

- (1) Are peculiar to the project or the parcel on which the project would be located;
- (2) Were not analyzed as significant effects in a prior FEIR on the zoning action, general plan, or community plan, with which the project is consistent;
- (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior FEIR prepared for the general plan, community plan or zoning action, or
- (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the FEIR was certified, are determined to have a more severe adverse impact than discussed in the prior FEIR.

The following pages of this document contain an Environmental Checklist that examines the proposed project's potential environmental effects within the parameters outlined in CEQA Guidelines Section 15183(b). The "Prior FEIR" used for comparison is the General Plan FEIR certified by the Santa Rosa City Council on November 3, 2009, including all impact determinations and significance thresholds utilized therein.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>A. Land Use Consistency and Compatibility</b> <i>Would the project:</i>					
a) Physically divide an established community.	LTS	No	No	No	No
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 costal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	LTS	No	No	No	No
c) Conflict with any applicable habitat conservation plan or natural community conservation plan.	LTSM	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

**a) Physically Divide Community**

Would the project: *Physically divide an established community?*

The General Plan FEIR concluded that there would not be any significant effects for this criterion with implementation of General Plan policy provisions.

The project site is already developed with vacant buildings and does not contain an existing community. The proposed project would include housing on a project site designated for Medium High-Density Residential uses, consistent with what was envisioned in the General Plan and evaluated in the General Plan FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to division of an established community beyond what was previously analyzed in the General Plan FEIR.

**b) Plan, Policy or Regulation Conflict**

Would the project: *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 costal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

The General Plan FEIR concluded there would not be any significant effects for this criterion with implementation of proposed General Plan policy provisions.

The proposed project would include housing on a project site designated for Medium High-Density Residential uses, consistent with what was envisioned in the General Plan and evaluated in the General Plan FEIR. Furthermore, as discussed in Section 3, Project Consistent with a Community Plan or Zoning, the proposed project is consistent with General Plan policies applicable to the project site. Therefore, the proposed project would not result in any peculiar effects and would not result in new impacts related to plan, policy, and regulation conflict beyond what was previously analyzed in the General Plan FEIR.

**c) Habitat Conservation Plan Conflict**

Would the project: *Conflict with any applicable habitat conservation plan or natural community conservation plan?*

The General Plan FEIR evaluated impacts to the Santa Rosa Plain Conservation Strategy<sup>9</sup> and determined that significant impacts could potentially occur to protected wildlife and plant species. However, the General Plan EIR concluded that the implementation of Mitigation Measure 4.F-5 would reduce impacts to a less than significant level.

The project site is already developed with urbanized uses and is not located in an area with suitable habitat protected under the Santa Rosa Plain Conservation Strategy (see Impact F(f) for further discussion). Because the project site does not contain habitat for the sensitive species included in Mitigation Measure 4.F-5, this mitigation measure is not applicable to the proposed project. Therefore, the proposed project would not result in any peculiar effects and would not result in new impacts related to conflicts with a habitat conservation plan or natural community conservation plan beyond what was previously analyzed in the General Plan FEIR.

<sup>9</sup> United States Fish and Wildlife Service (USFWS). 2005. Sacramento Fish and Wildlife Office. Santa Rosa Conservation Strategy. Website: [https://www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/Documents/Title\\_Page.pdf](https://www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/Documents/Title_Page.pdf). Accessed December 26, 2019.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>B. Population, Housing, and Employment</b> <i>Would the project:</i>					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	LTS	No	No	No	No
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.	LTS	No	No	No	No
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

**a) Substantial Population Growth**

Would the project: *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)?*

The General Plan FEIR analyzed the addition of 23,770 dwelling units and a total of 233,520 residents by the year 2035 and determined that impacts associated with buildout under the General Plan would be less than significant related to direct population growth. In addition, the General Plan FEIR determined that future job growth at buildout would result in 128,400 jobs, which was found to be a less than significant impact related to indirect population growth.

The proposed project would result in 168 dwelling units, which would be less than 1 percent of the expected 23,770 new dwelling units constructed in the City by 2035. The proposed project would employ four people at buildout, which would not represent a significant increase in employment. The project site is located in an urbanized area served by existing urban infrastructure such as, roads, utility lines, and transit service. Additionally, the proposed project would include housing on a project site designated for Medium High-Density Residential uses consistent with what was envisioned in the General Plan and evaluated in the General Plan FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in new impacts related to substantial population growth beyond what was analyzed in the General Plan FEIR.

**b) Housing Displacement**

Would the project: *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

The General Plan FEIR determined that development at buildout could displace existing housing, but impacts would be less than significant with the implementation of General Plan policies and the assumption that redesignation of sites would result in more dense housing.

The project site does not contain existing housing units. As a result, the proposed project would not displace existing housing. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to displacement of housing beyond what was previously analyzed in the General Plan FEIR.

**c) People Displacement**

Would the project: *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

The General Plan FEIR determined that development at buildout could displace existing people, but impacts would be less than significant with implementation of General Plan policies and the assumption that redesignation of sites would result in more dense housing and would not result in the displacement of substantial number of people.

The project site does not contain existing housing units. As a result, the proposed project would not displace existing people. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to displacement of people beyond what was previously analyzed in the General Plan FEIR.



Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>C. Transportation and Circulation</b> <i>Would the project:</i>					
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).	SU	No	No	No	No
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.	SU	No	No	No	No
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.	LTS	No	No	No	No
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	LTS	No	No	No	No
e) Result in inadequate emergency access.	LTS	No	No	No	No
f) Result in inadequate parking capacity.	LTS	No	No	No	No
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

The transportation analysis in this section is based on a Traffic Impact Study (TIS) prepared by Whitlock & Weinberger Transportation (W-Trans) dated August 6, 2020, provided in Appendix A.

### Study Area and Periods

The study area consists of the following intersections:

1. Guerneville Road/Marlow Road
2. West College Avenue/Putney Drive

3. West College Avenue/Navarro Street
4. West College Avenue/Marlow Road-Stony Point Road
5. West 9<sup>th</sup> Street/Stony Point Road

Operating conditions during the AM and PM peak periods were evaluated to capture the highest potential impacts for the proposed project as well as the highest volumes on the local transportation network. The AM peak-hour occurs between 7:00 a.m. and 9:00 a.m. and reflects conditions during the home to work or school commute, while the PM peak-hour occurs between 4:00 p.m. and 6:00 p.m. and typically reflects the highest level of congestion during the homeward bound commute.

### Study Intersections

**Guerneville Road/Marlow Road** is a four-legged signalized intersection with marked crosswalks and bike lanes present on all legs. Protected left-turn phasing is provided at all approaches and pedestrian phasing exists on all legs.

**West College Avenue/Putney Drive** is a four-legged signalized intersection with marked crosswalks across all legs supported by pedestrian phasing. Class II bike lanes are present on both the east and west legs.

**West College Avenue/Navarro Street** is an unsignalized tee intersection including stop-control on the southbound approach.

**West College Avenue/Marlow Road-Stony Point Road** is a four-legged signalized intersection including crosswalks and bike lanes as well as protected left-turn phasing and pedestrian phasing on all legs.

**West 9<sup>th</sup> Street/Stony Point Road** is a four-legged signalized intersection including crosswalks on the north, east, and west legs. Split phasing controls the east-west traffic, and protected left-turn phasing is provided for north-south traveling vehicles. Pedestrian phasing is provided on the north, east, and west legs and Class II bike lanes are provided on the north, south, and east legs.

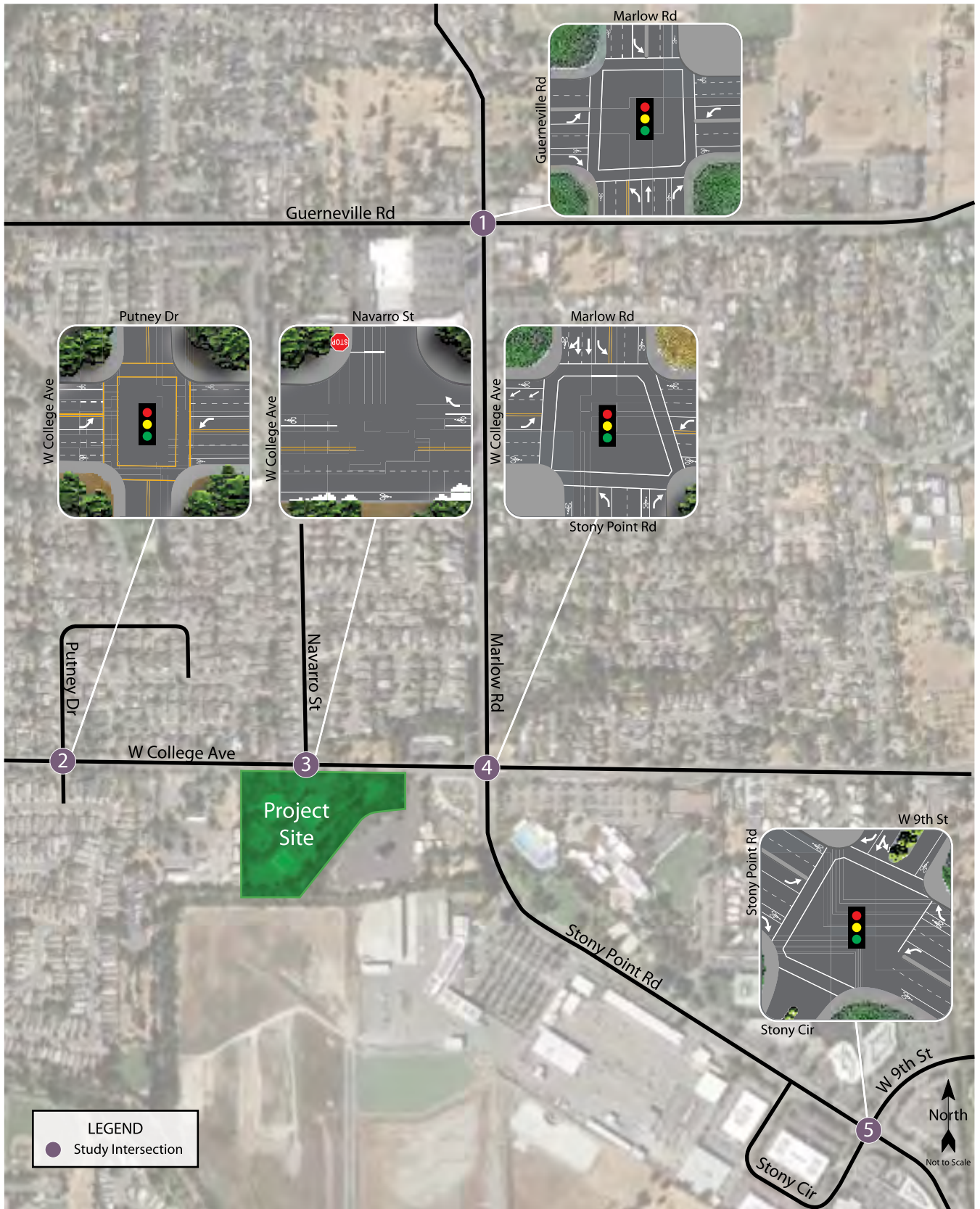
The locations of the study intersections and the existing lane configurations and controls are shown in Exhibit 10.

### Study Roadways

**Marlow Road-Stony Point Road** is a north-south arterial with an approximate 76-foot width in the project vicinity that includes four travel lanes as well as a center median or a two-way left-turn lane in some locations. The roadway also includes 13-foot travel lanes, Class II bike lanes, and has posted speed limit of 35 miles per hour (mph).

**Guerneville Road** is an arterial running east-west. Near the project site, the roadway is approximately 70 feet wide, including four travel lanes, Class II bike lanes, and either a raised center median or a two-way left-turn lane. The roadway is also characterized by 12-foot wide travel lanes and has a posted speed limit of 40 mph.

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Source: W-Trans, April 2019.



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**West College Avenue** is an east-west arterial approximately 60 feet in width. The roadway is generally characterized by four 11-foot wide travel lanes including two in each direction, together with a center two-way, left-turn lane and Class II bike lanes. Currently, there is only one westbound lane across from the project's frontage where two parcels are mostly undeveloped. The roadway has a posted speed limit of 40 mph.

**Putney Drive** is a north-south local street with two travel lanes and parking on both sides of the street. The posted speed limit is 25 mph.

**Navarro Street** is also a north-south local street with two travel lanes and parking on both sides of the street and a speed limit of 25 mph.

**West 9<sup>th</sup> Street** is an east-west arterial characterized by two 12-foot travel lanes, a raised median, Class II bike lanes and a posted speed limit of 30 mph.

### Existing Traffic Conditions

The Existing Conditions scenario provides an evaluation of current operation based on existing traffic volumes during the AM and PM peak periods. Volume data was collected while local schools were in session. Under these existing volumes, all the study intersections are operating acceptably, as shown in Exhibit 11.

### Future Conditions

The anticipated Future volumes (without the proposed project) are shown in Exhibit 12. The future conditions assume the addition of a second through lane of West College Avenue (there is currently only one), which is an improvement the City is planning on implementing. The study intersections are expected to operate acceptably.

### Collision History

The collision history for the study area was reviewed to determine any trends or patterns that may indicate a safety issue. Collision rates were calculated based on records available from the California Highway Patrol as published in their Statewide Integrated Traffic Records System reports. The most current 5-year period available is November 1, 2013, through September 30, 2018.

As presented in Table 2, the calculated collision rates for the study intersections were compared to average collision rates for similar facilities Statewide as indicated in *2014 Collision Data on California State Highways*, California Department of Transportation (Caltrans). With the exception of Guerneville Road/Marlow Road, all the study intersections had collision rates below the Statewide average for similar facilities. The collision rate calculations are summarized in Table 2.

Table 2: Collision Rates at the Study Intersections

Study Intersection	Number of Collisions (2013–2018)	Calculated Collision Rate (c/mve)	Statewide Average Collision Rate (c/mve)
1. Guerneville Road/Marlow Road	17	<b>0.57</b>	0.43
2. West College Avenue/Putney Drive	4	0.17	0.43
3. West College Avenue/Navarro Street	1	0.05	0.14
4. West College Avenue/Marlow Road- Stony Point Road	11	0.16	0.43
5. West 9 <sup>th</sup> Street/Stony Point Road	5	0.09	0.43

Note:  
c/mve = collisions per million vehicles entering; bold text indicates a collision rate that exceeds the statewide average for similar facilities  
Source: W-Trans, 2020.

**Pedestrian Facilities**

Pedestrian facilities include sidewalks, crosswalks, pedestrian signal phases, curb ramps, curb extensions, and various streetscape amenities such as lighting, etc. In general, a network of sidewalks, crosswalks, pedestrian signals, and curb ramps provide adequate access for pedestrians in the vicinity of the proposed project site; however, sidewalk gaps can be found along some of the roadways connecting to the project site.

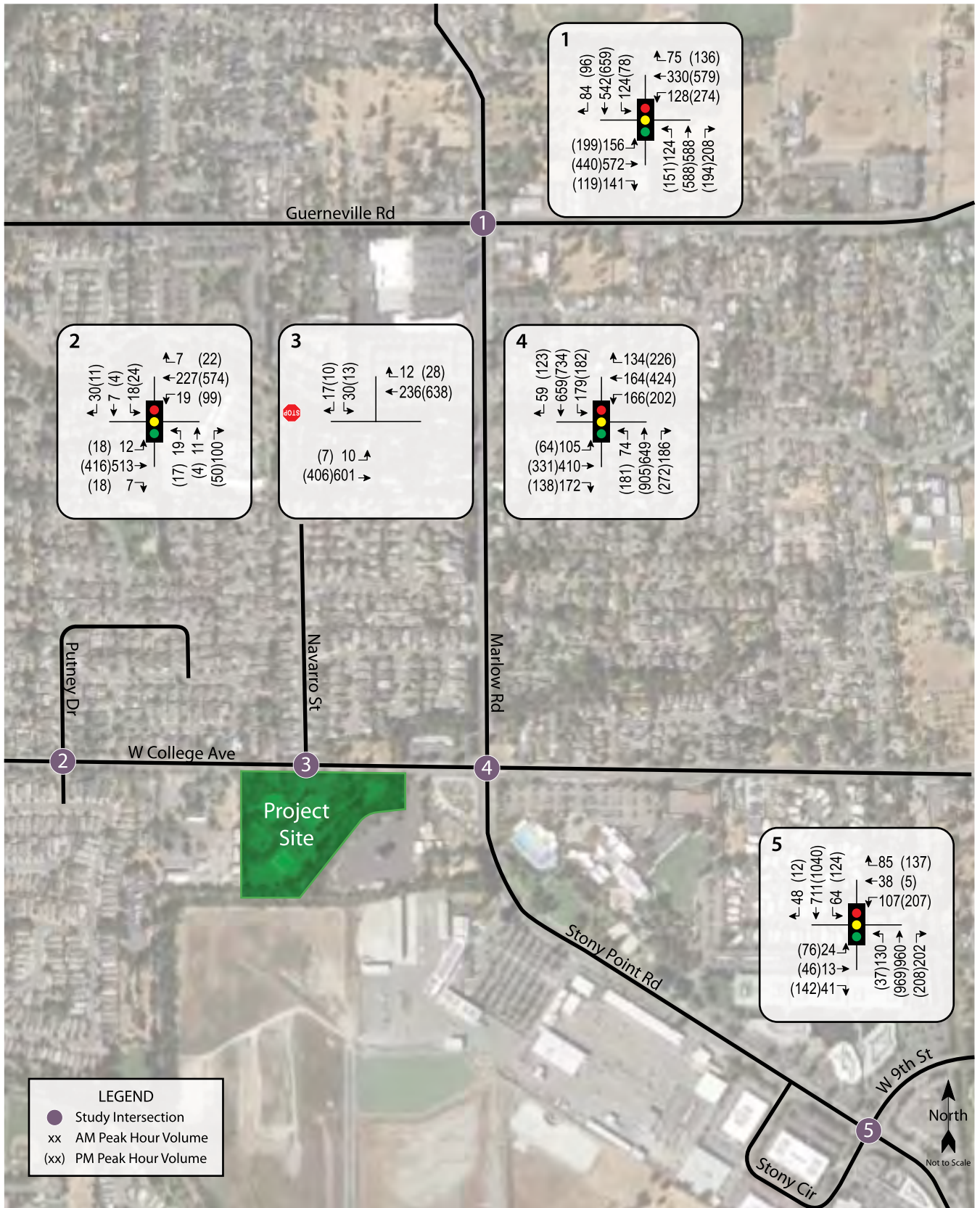
**Marlow Road**—Continuous sidewalks are provided on both sides of Marlow Road between Guerneville Road and West Third Street. Curb ramps and crosswalks at side street approaches are present and lighting is provided by overhead streetlights near the project site.

**Putney Drive**—Continuous sidewalks are present along both sides of Putney Drive for the entirety of the roadway supplemented by curb ramps and overhead streetlights.

**Navarro Street**—There are continuous sidewalks along both sides of Navarro Street for the entirety of the roadway in addition to curb ramps and overhead streetlights.

**West College Avenue**—Continuous sidewalk is provided on both sides of West College Avenue near the proposed project. Rather than a paved concrete sidewalk, a gravel trail exists on the north side of the street for approximately 350 feet east and 100 feet west of the intersection at Navarro Street. Curb ramps and crosswalks at side street approaches are present, and lighting is provided by overhead streetlights. Crosswalks over West College Avenue are present only at the signalized intersections near the project site.

**Stony Point Road**—Either continuous sidewalk or a path is provided along the two sides of Stony Point Road. The west side of the road includes sidewalk while the east side of the road is characterized by a mix of sidewalks and paved pedestrian paths. Curb ramps are provided at all driveways and intersections. Overhead streetlights are provided on the west side of the roadway and pedestrian scale lighting is provided on the east side.

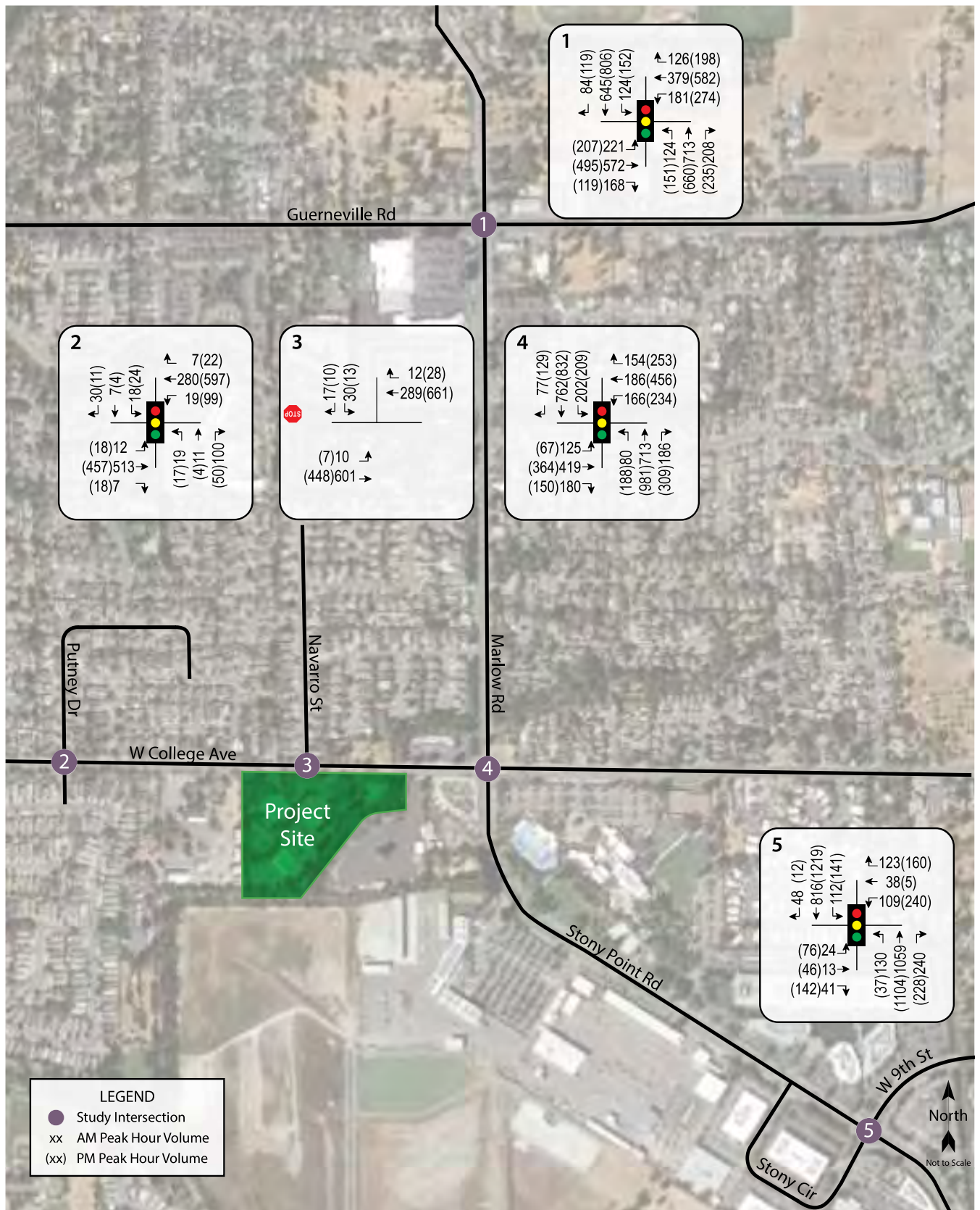


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**Santa Rosa Creek Trail**—The Santa Rosa Creek trail exists south of the project site. The trail is a paved off-street path for use by pedestrians and cyclists. The trail includes access points to arterials and local streets within the project vicinity.

## Bicycle Facilities

The *Highway Design Manual*<sup>10</sup> classifies bikeways into four categories:

**Class I Multi-Use Path**—a completely separated right-of-way for the exclusive use of bicycles and pedestrians with cross flows of motorized traffic minimized.

**Class II Bike Lane**—a striped and signed lane for one-way bike travel on a street or highway.

**Class III Bike Route**—signing only for shared use with motor vehicles within the same travel lane on a street or highway.

**Class IV Bikeway**—also known as a separated bikeway, a Class IV Bikeway is for the exclusive use of bicycles and includes a separation between the bikeway and the motor vehicle traffic lane. The separation may include, but is not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

The Santa Rosa Creek Trail runs along the south side of the project site. The trail includes access points to arterials and local streets within the project vicinity. Class II bike lanes exist on Marlow Road-Stony Point Road, Guerneville Road, West College Avenue, and West 9<sup>th</sup> Street. Bicyclists ride in the roadway and/or on sidewalks along all other streets in the study area. Table 3 summarizes the existing and planned bicycle facilities in the project vicinity, as contained in the City of Santa Rosa Bicycle & Pedestrian Master Plan Update 2018.<sup>11</sup>

**Table 3: Bicycle Facility Summary**

Status Facility	Class	Length (miles)	Begin Point	End Point
<b>Existing</b>				
Santa Rosa Creek Trail	I	2.14	Willowside Road	Prince Memorial Gateway
Marlow Road-Stony Point Road	II	3.14	Piner Road	Rose Avenue
Guerneville Road	II	2.31	City Limit	Steele Way
West College Avenue	II	1.45	Fulton Road	Kowell Road
West 9 <sup>th</sup> Street	II	1.10	Stony Point Road	Wilson Street
<b>Planned</b>				
West College Avenue	I	1.61	Link Lane	4 <sup>th</sup> Street
Source: City of Santa Rosa. 2018. City of Santa Rosa Bicycle & Pedestrian Master Plan Update 2018.				

<sup>10</sup> California Department of Transportation (Caltrans). 2018. Highway Design Manual, Sixth Edition. Website: <https://dot.ca.gov/-/media/dot-media/programs/design/documents/hdm-complete-14dec2018.pdf#page=807>. Accessed December 26, 2019.

<sup>11</sup> City of Santa Rosa. 2018. City of Santa Rosa Bicycle & Pedestrian Master Plan Update 2018. Website: <https://srcity.org/2711/Bicycle-and-Pedestrian-Master-Plan>. Accessed December 26, 2019.

## Transit Facilities

The Santa Rosa CityBus provides fixed route bus service in Santa Rosa. City Bus Route 9 provides loop service to destinations throughout the City and stops on Stony Point Road, Guerneville Road, and West College Avenue. Route 9 operates Monday through Friday with approximately 30-minute headways between 6:00 a.m. and 8:00 p.m. Saturday service operates with approximately 60-minute headways between 6:45 a.m. and 7:45 p.m.

Route 15 serves stops along Stony Point Road, Marlow Road, and Guerneville Road near the project site. Route 15 operates Monday through Friday with approximately 60-minute headways between 6:00 a.m. and 8:00 p.m. The route operates with approximately 60-minute headways on weekends as well. On Saturdays, the route operates between 8:00 a.m. and 8:30 p.m. while on Sundays the route operates between the hours of 10:00 a.m. and 5:30 p.m.

Route 19 provides service along Fulton Road, Guerneville Road, and West College Avenue within the project vicinity, terminating near the Fountaingrove Village Shopping Center. The route operates Monday through Friday between 8:00 a.m. and 5:30 p.m. with headways of approximately 60 minutes.

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

### a) Traffic Increase

Would the project: *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)?*

The General Plan FEIR evaluated Level of Service (LOS) on arterial roadways in the City at buildout of the General Plan in 2035 and concluded that impacts would be significant and unavoidable. Although General Plan policies would reduce the impacts to the maximum extent feasible, the General Plan FEIR determined that no feasible mitigation is available to reduce impacts to less than significant.

The proposed project is expected to generate an average of 914 trips per day, including 60 AM peak-hour trips, and 74 PM peak-hour trips, as shown in Table 4. Table 5 summarizes the projects associated trip distribution.

**Table 4: Project Trip Generation Summary**

Land Use	Units	Daily		AM Peak-hour				PM Peak-hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Apartments	168 du	5.44	914	0.36	60	16	44	0.44	74	45	29
Note: du = dwelling unit Source: W-Trans 2020.											

**Table 5: Trip Distribution Assumptions**

Route	Percent	Daily Trips	AM Trips	PM Trips
Marlow Road north of Guerneville Road	25%	229	15	19
West College Avenue west of Putney Drive	5%	46	3	4
West College Avenue east of Stony Point Road	50%	456	30	36
Stony Point Road south of West 9 <sup>th</sup> Street	20%	183	12	15
<b>Total</b>	<b>100%</b>	<b>914</b>	<b>60</b>	<b>74</b>
Source: W-Trans 2020.				

The TIS determined that study intersections would continue to operate at acceptable levels during both the AM and PM peak-hours under existing conditions with the addition of project-related traffic (Exhibit 13). Table 6 summarizes the results of Existing plus Project traffic volumes and LOS impacts.

**Table 6: Existing and Existing plus Project Peak-hour Intersections Level of Service**

Study Intersection Approach	Existing Conditions				Existing plus Project			
	AM Peak-hour		PM Peak-hour		AM Peak-hour		PM Peak-hour	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. Guerneville Road/Marlow Road	43.8	D	44.6	D	43.8	D	44.8	D
2. West College Avenue/Putney Drive	6.4	A	4.8	A	6.5	A	4.8	A
3. West College Avenue/Navarro Street <i>Southbound (Navarro Street) Approach</i>	0.7 12.4	A B	0.5 16.6	A C	0.7 12.7	A B	0.7 17.1	A C
4. West College Avenue/Marlow Road-Stony Point Road	49.1	D	42.8	D	49.8	D	43.8	D
5. West 9 <sup>th</sup> Street/Stony Point Road	24.2	C	39.5	D	24.6	C	41.1	D
Notes: Delay is measured in average seconds per vehicle LOS = Level of Service Results for minor approaches to two-way stop-controlled intersections are indicated in italics. Source: W-Trans 2020.								

The TIS determined that study intersections would continue to operate at acceptable levels during both the AM and PM peak-hours under future conditions with the addition of project-related traffic and planned improvements to study intersections (Exhibit 14). Table 7 summarizes the results of Future plus Project operating conditions.

**Table 7: Future and Future plus Project Peak-hour Intersections Level of Service**

Study Intersection Approach	Future Conditions				Future plus Project			
	AM Peak-hour		PM Peak-hour		AM Peak-hour		PM Peak-hour	
	Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS
1. Guerneville Road/Marlow Road	50.0	D	49.2	D	50.0	D	49.4	D
2. West College Avenue/Putney Drive	6.4	B	4.9	A	6.4	A	4.9	A
3. West College Avenue/Navarro Street <i>Southbound (Navarro Street) Approach</i>	0.8 <i>13.1</i>	A <i>B</i>	0.4 <i>15.9</i>	A <i>C</i>	0.8 <i>13.4</i>	A <i>B</i>	0.4 <i>16.4</i>	A <i>C</i>
4. West College Avenue/Marlow Road-Stony Point Road	50.4	D	49.8	D	51.2	D	51.1	D
5. West 9 <sup>th</sup> Street/Stony Point Road	27.8	C	42.2	D	27.8	C	42.3	D
Notes: Delay is measured in average seconds per vehicle LOS = Level of Service Results for minor approaches to two-way stop-controlled intersections are indicated in italics. Source: W-Trans 2020.								

Because the study intersections would operate appreciably under Existing plus Project and Future plus Project, the proposed project would not result in any peculiar effects and would not introduce additional traffic loads or impacts to street traffic capacity beyond what was evaluated in the General Plan FEIR.

### **Traffic Signal Warrants**

Although expected to operate acceptably under all scenarios evaluated, a signal warrant analysis was performed to determine potential need for a traffic signal at the intersection of West College Avenue/Navarro Street. Based on Existing, Existing plus Project, Future, and Future plus Project traffic volumes for both the AM and PM peak-hours, the Peak-hour Volume traffic signal warrant is not satisfied for the unsignalized intersection at West College Avenue/Navarro Street. As a result, installation of a traffic signal at this intersection is not recommended. Further analysis is provided in Appendix A.

### **Vehicle Miles Traveled**

Senate Bill (SB) 743, codified as Public Resources Code Section 21099, mandated a transition away from LOS as a way of measuring the significance of traffic impacts under CEQA. Section 21099(b)(2) provides that “[u]pon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, **shall not be considered a significant impact on**

**the environment pursuant to this division**, except in locations specifically identified in the guidelines, if any.” (emphasis added). SB 743 also requires agencies to transition to a metric known as Vehicle Miles Traveled (VMT) by July 1, 2020, which focuses on whether a proposed project will require people to drive more or less and is far more favorable to transit-oriented development.

VMT significance thresholds for residential projects are based on total VMT. A residential project resulting in a total VMT that exceeds the region’s average VMT may reflect a significant impact. The California Office of Planning and Research (OPR) Technical Advisory on Evaluation Transportation Impacts in CEQA and the Sonoma County Transportation Authority (SCTA) model advise, using a metric of home-based VMT per capita for residential uses.<sup>12</sup> Specifically, a project exceeding a level of 15 percent below the existing regional VMT per capita may indicate a significant transportation impact. The OPR encourages the use of screening maps to establish geographic areas that achieve the 15 percent below regional average thresholds, allowing jurisdictions to “screen” projects in those areas from quantitative VMT analysis because impacts can be presumed to be less than significant. The SCTA prepared a draft screening map that shows the project site to be within a screened area.

Based on data from the recently updated SCTA travel demand model, the County of Sonoma has a baseline average residential VMT of 15.56 miles per capita. Pursuant to OPR’s guidance, a residential project generating VMT that is 15 percent or more below this value (or 13.23 miles per capita or less) would have a less-than-significant VMT impact. The SCTA model includes traffic analysis zones (TAZ) covering geographic areas throughout Sonoma County including the City of Santa Rosa. The project site is located within TAZ 470; a residential land use is not coded into the current model for TAZ 470 because the site was most recently occupied by the Sonoma County Water Agency (an office land use).

To establish a baseline VMT for the proposed project, data from the adjacent TAZ (TAZ 471, which is immediately west of TAZ 470) was used because it is the TAZ with the highest VMT per capita proximate to the TAZ in which the project site is located. Based on the current SCTA travel demand model, TAZ 471 is characterized by a baseline VMT of 14.27 per capita. Because the VMT for TAZ 471 exceeds 13.23 miles per capita, the proposed project would be expected to have a significant impact with respect to VMT. However, this rate reflects the VMT for detached single-family dwellings, and does not accurately reflect the proposed usage. Therefore, reductions for density, pedestrian improvements, affordable housing, and proximity to transit were applied.

It is estimated that the proposed project has a density of approximately 28.9<sup>13</sup> units per acre. Based on the California Air Pollution Control Officers Association methodology, this translates to a 20.1 percent reduction in per capita VMT. A methodology published in Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy<sup>14</sup>, was used to determine the VMT reductions associated with provision of on-site affordable housing (this method is also currently used by the City of San Jose). The proposed project would include 59 such units and the corresponding anticipated reduction in the project’s VMT would be 3.6 percent. Further, the proposed project

<sup>12</sup> Office of Planning and Research. 2018. Technical Advisory On Evaluating Transportation Impacts In CEQA. December.

<sup>13</sup> The TIS utilizes an acreage of 5.7 as opposed to 5.82 for the density calculation. The slight difference in density does not impact the VMT analysis.

<sup>14</sup> Center for Neighborhood Technology. 2015. Income, Location Efficiency, and VMT: Affordable Housing as a Climate Strategy.



would include an enhanced crosswalk at the intersection of West College Avenue/Navarro Street, which would be expected to reduce the VMT per capita by 2 percent.

Applying adjustments for the project's residential density, provision of affordable housing, and pedestrian enhancements, the proposed project is anticipated to generate 10.77 VMT per capita, thereby having a less-than-significant impact on VMT. A summary of the VMT findings is shown in Table 8 and summary sheets are provided in Appendix A.

**Table 8: Vehicle Miles Traveled Analysis Summary**

VMT Metric	Baseline VMT Rate (Citywide Average)	Threshold (15% Below Citywide Average)	Project VMT Rate		
			Base Unadjusted (TAZ 471)	With Adjustments	Significance Finding
Residential VMT per Capita (Citywide Baseline)	15.56	13.23	14.27	10.77	Less than Significant
Notes: VMT Rate is measured in VMT per Capita, or the number of daily miles driven per resident; TAZ=Traffic Analysis Zone Source: W-Trans 2020					

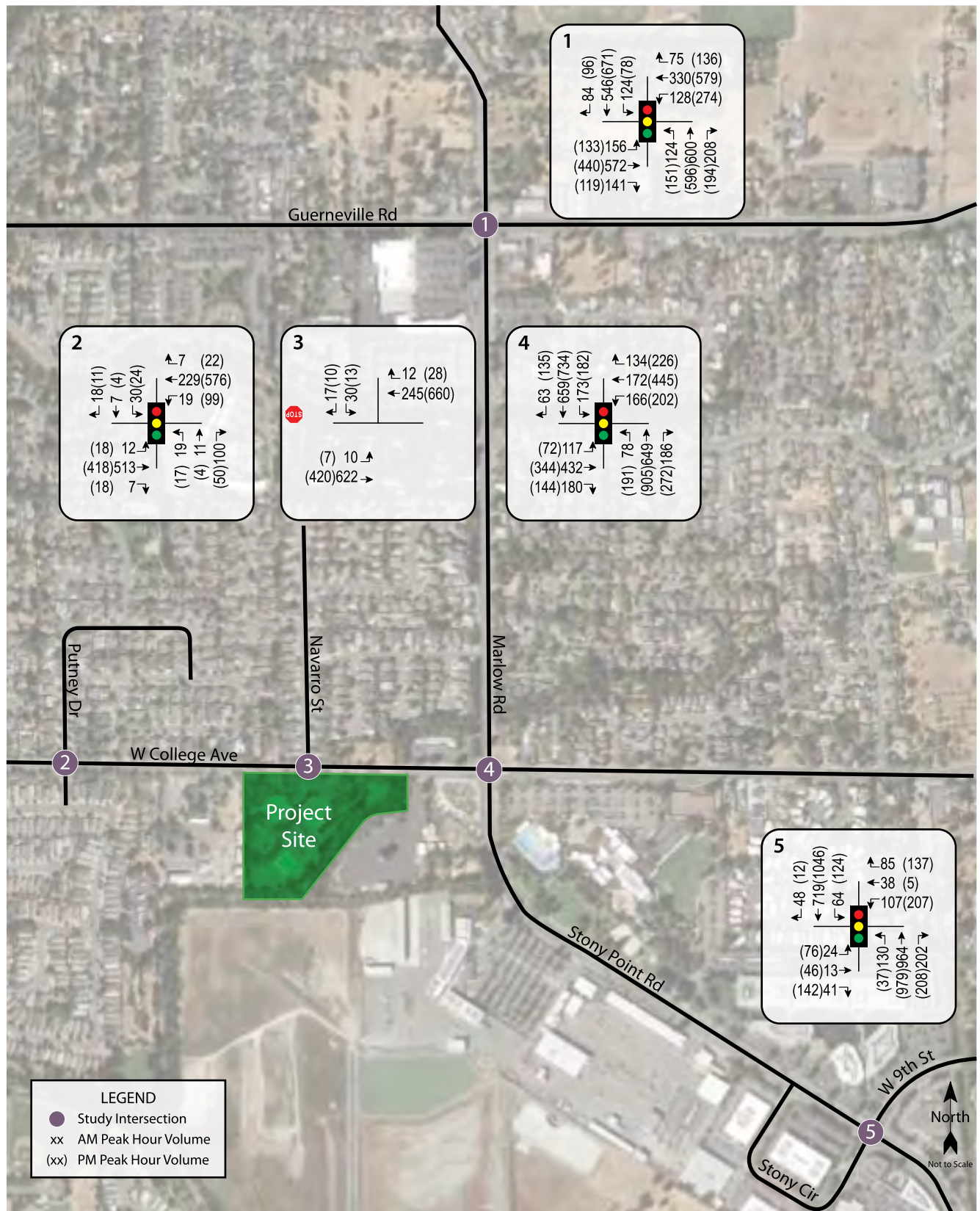
Therefore, the proposed project would not result in any peculiar effects and would not result in new impacts related to traffic increase beyond what was previously analyzed in the General Plan FEIR.

**b) Congestion Management Agency Roads or Highways**

Would the project: *Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?*

The General Plan FEIR evaluated LOS on arterial roadways in the City at buildout of the General Plan in 2035 and concluded that impacts would be significant and unavoidable. Although General Plan policies would reduce the impacts to the maximum extent feasible, the General Plan FEIR determined that no feasible mitigation is available to reduce impacts to less than significant.

As discussed under Impact C (a), the proposed project would not generate traffic volumes that would exceed LOS standards established by the General Plan FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to LOS standards analyzed in the General Plan FEIR.

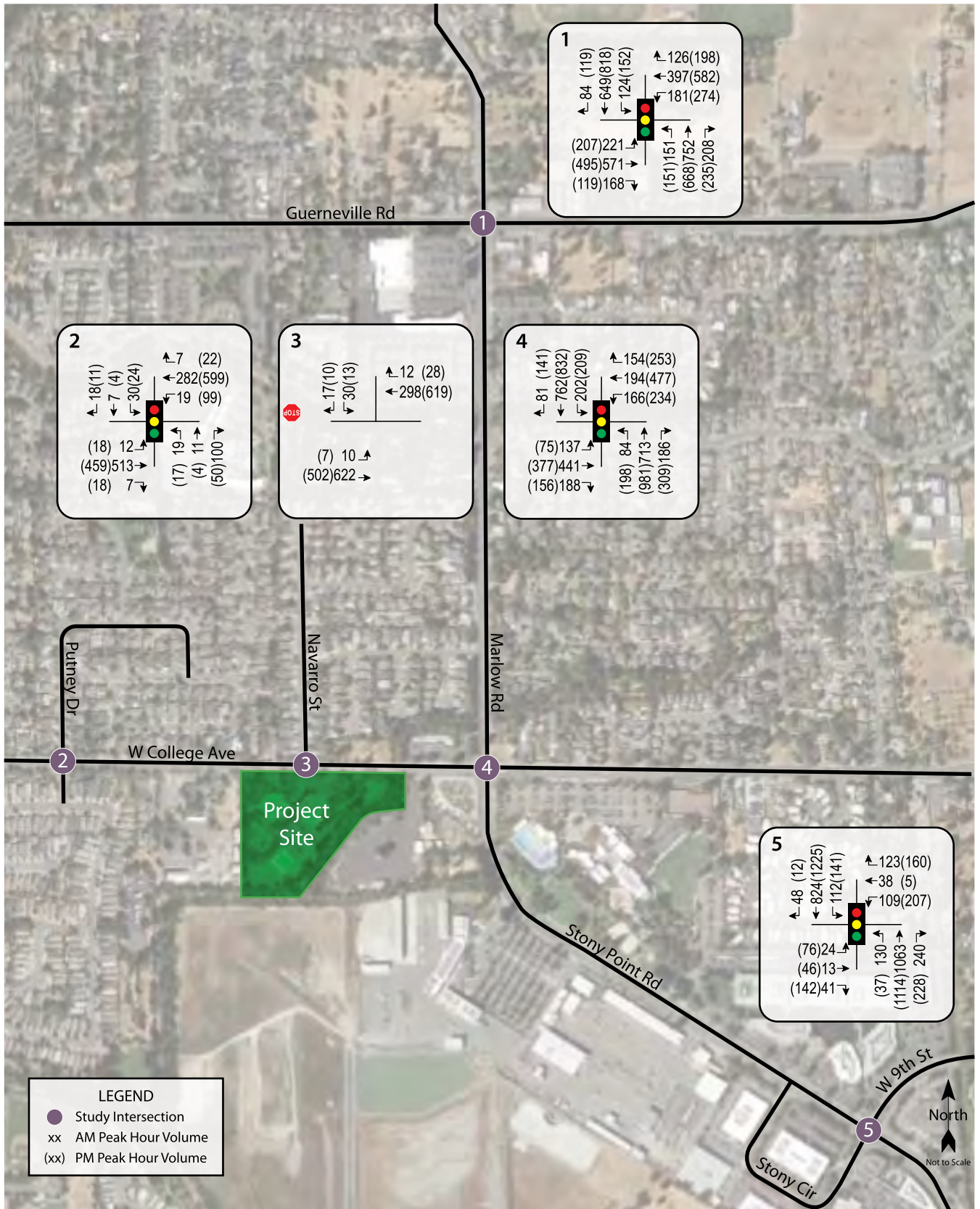


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**c) Air Traffic Patterns**

Would the project: *Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*

The General Plan FEIR determined that although portions of the City are within the boundaries of the Comprehensive Airport Land Use Plan Update for Sonoma County prepared by the Sonoma County Airport Land Use Commission (ALUC), no impacts would occur.

The project site is located 4.7 miles south of the Sonoma County Airport and as such, is outside the boundaries of the area of influence for the Sonoma County Airport Land Use Plan. Therefore, the proposed project would not result in any peculiar effects and would not result in new impacts related to air traffic patterns beyond what was analyzed in the General Plan FEIR.

**d) Design Feature Hazard**

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

The General Plan FEIR determined that implementation of policies and provisions to maintain roadways and improve traffic flow would, in combination with construction of planned new roadway facilities, ensure impacts related to roadway safety would be less than significant.

**Collisions**

As shown in Table 2, with the exception of Guerneville Road/Marlow Road, all the study intersections had collision rates below the Statewide average for similar facilities. A total of 17 collisions were reported to have occurred at the intersection of Guerneville Road/Marlow Road, resulting in a rate of 0.57 collisions per million vehicles entering (c/mve) the intersection compared to the Statewide average of 0.43c/mve. Of the 17 reported collisions, 10 were reported as including injuries to one or more parties involved, resulting in an injury rate of 58.8 percent compared to the Statewide average of 37.9 percent. The most prevalent primary collision factors included signal violations (8 collisions) and unsafe speed (6 collisions). Further, all the signal violations resulted in broadside collisions while the unsafe speed violations resulted in rear-end collisions. Both of the primary collision types as well as the movements involved are indicative of congested conditions and not design feature hazards.

**Sight Distance**

Sight distance along West College Avenue at project driveways was evaluated based on sight distance criteria contained in the Caltrans Highway Design Manual. Based on field observations and the project site plan, sight distances along West College Avenue at the proposed project driveways are expected to be adequate for a design speed of 45 mph, more than the posted speed of 40 mph.

**Left-Turn Lane Warrants**

West College Avenue generally includes four travel lanes and a center two-way left-turn lane except adjacent to the project frontage, where there are two eastbound travel lanes and one westbound



travel lane and west of Putney Avenue there is only one eastbound travel lane. For the purposes of the TIS, project-generated trips were split equally between the two driveways assuming that about half the residences would be most conveniently accessed from each driveway location. Under Existing plus Project volumes, a left-turn lane is not warranted on West College Avenue at either project driveway during the AM peak-hour. However, a left-turn lane would be warranted at the western project driveway during the PM peak-hour under the assumption that inbound trips would be split between the two driveways.

As described in Section 2, Project Description, the proposed project would include the reconfiguration of the travel lanes along and west of the project frontage. Currently there are two eastbound travel lanes and one westbound travel lane. The reconfiguration would consist of converting one eastbound travel lane to a two-way left-turn lane, providing a continuous center turn lane from Putney Avenue to Stony Point Road. The reconfiguration would allow for less delay and queuing to occur at the project driveways, specifically for vehicles following drivers making left turns into the project site.

A future conditions analysis was not performed as it is assumed that either the properties on the north side of this section of West College Avenue will be developed and provide frontage improvements to accommodate a five-lane section or the City will undertake a project to complete the planned widening. With the planned widening, a two-way left-turn lane would be included that would continue to accommodate project-generated turns.

Therefore, the proposed project would not result in any peculiar effects and would not result in new impacts related to roadway design beyond what was previously analyzed in the General Plan FEIR

#### **e) Emergency Access**

Would the project: *Result in inadequate emergency access?*

The General Plan FEIR determined that implementation of General Plan policies, modern construction design standards, and conformance with current City and State requirements would ensure the provision of adequate emergency access and impacts would be less than significant.

Access to the project site is provided by two existing stop-controlled driveways on West College Avenue located east and west of the intersection at Navarro Street. New driveways would be constructed as part of the new development in generally the same location as the existing driveways, with both driveways being approximately 28 feet wide. Driveways of this width would be expected to provide ample space to allow an emergency vehicle to enter and exit the project site safely. Therefore, the proposed project would not result in any peculiar effects and would not result in new impacts related to inadequate emergency access beyond what was previously analyzed in the General Plan FEIR.

**f) Parking Capacity**

Would the project: *Result in inadequate parking capacity?*

The General Plan FEIR determined that future development would increase demand for parking in the City. However, the General Plan FEIR concluded that public parking pricing and implementation of General Plan policies would reduce impacts related to parking capacity to a less than significant level.

Subsequent to certification of the General Plan FEIR, this environmental topic was removed by the California Legislature from the CEQA Guidelines. As such, the analysis of potential environmental effects under this criterion is no longer required. Nevertheless, the proposed project would include uses consistent with what was envisioned in the General Plan and the automobile and bicycle parking exceed parking requirements pursuant to the City's Municipal Code.<sup>15</sup> Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to parking facilities than previously analyzed in the General Plan FEIR.

**g) Alternative Transportation Plan Conflict**

Would the project: *Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?*

The General Plan determined that implementation of the Bicycle and Pedestrian Master Plan and policies contained in the General Plan would ensure less than significant impacts to bicycle, pedestrian, and transit facilities.

Consistent with related General Plan policies, the Bicycle and Pedestrian Master Plan, and the Santa Rosa Citywide Creek Master Plan, the proposed project would extend the existing College Creek trail from the existing point on the project site north to West College Avenue, which would improve trail connectivity for nearby residents. In addition, the proposed project would include pedestrian and bicycle infrastructure throughout the site. Further, the proposed project would include the installation of an enhanced crosswalk including Rectangular Rapid Flashing Beacons at West College Avenue/Navarro Street to provide safe access for school-aged residents of the project who would be likely to attend Albert F. Biella Elementary School. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to policies, plans, and programs supporting transit, bicycle, and pedestrian facilities than previously analyzed in the General Plan FEIR.

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<sup>15</sup> W-Trans. 2020. Traffic Impact Study for the West College Avenue Apartments, page 24. August 6.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>D. Air Quality</b> <i>Would the project:</i>					
a) Conflict with or obstruct implementation of the applicable air quality plan?	SU	No	No	No	No
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	LTS	No	No	No	No
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)?	SU	No	No	No	No
d) Expose sensitive receptors to substantial pollutant concentrations?	LTSM	No	No	No	No
e) Create objectionable odors affecting a substantial number of people?	LTSM	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

A detailed description of the assumptions used to estimate emissions and the complete California Emissions Estimator Mode (CalEEMod) output files are contained in Appendix B.

#### a) Air Quality Plan Conflict

*Would the project:*      *Conflict with or obstruct implementation of the applicable air quality plan?*

The General Plan FEIR evaluated if buildout of the General Plan would conflict with or obstruct implementation an applicable air quality plan and concluded that impacts would be significant and unavoidable. Although General Plan policies would reduce the impacts related to conflicts with the 2005 Bay Area Ozone Strategy<sup>16</sup> to the maximum extent feasible, the General Plan FEIR determined that no feasible mitigation was available to reduce impacts to less than significant. However, as

<sup>16</sup> Bay Area Air Quality Management District (BAAQMD). 2005. Bay Area 2005 Ozone Strategy. Volume 1. Website: [https://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Plans/2005%20Ozone%20Strategy/draft\\_vol1.ashx](https://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Plans/2005%20Ozone%20Strategy/draft_vol1.ashx). Accessed December 26, 2019.

indicated in the following analysis the project would not significantly conflict with or obstruct implementation of an Air Quality Attainment Plan.

The project site is located within the San Francisco Bay Area Air Basin (Air Basin) where the Bay Area Air Quality Management District (BAAQMD) is responsible for regulating air emissions. The BAAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment for. The Air Basin is currently designated as a nonattainment area for 1-hour ozone (State), 8-hour ozone (State and national), 24-hour particulate matter, including dust, 10 micrometers or less in diameter (PM<sub>10</sub>) (State), annual PM<sub>10</sub> (State), and particulate matter, including dust, 2.5 micrometers or less in diameter (PM<sub>2.5</sub>) (State and national). Strategies to achieve emissions reductions are in the 2017 Multi-Pollutant Clean Air Plan prepared by the BAAQMD for the region.<sup>17</sup> The Clean Air Plan is based on the Association of Bay Area Governments' (ABAG's) population projections as well as land use designations and population projections included in general plans for communities within the basin. Population growth is typically associated with the construction of residential units or large employment centers, and subsequently increased vehicular traffic. A project would be inconsistent with the Clean Air Plan if it resulted in population and/or employment growth in excess of the ABAG growth estimates for the area. The proposed project would provide housing for 286 residents and employment for 4 full-time staff on-site. The project site lies within a Medium-High-Density Residential area as designated by the General Plan. As noted previously, the proposed project is consistent with the General Plan designation. In addition, the proposed project is a residential development that would not exceed the BAAQMD operational and construction thresholds for criteria pollutants. As such, there are no significant adverse regional air quality impacts from the proposed project because it would be consistent with projected population growth anticipated in the General Plan.

The proposed project is subject to the requirements of the United States Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and the BAAQMD. The proposed project would be required to comply with all existing and new rules and regulations that are implemented by the EPA, ARB, and the BAAQMD. The proposed project would not conflict with or obstruct implementation of the applicable Clean Air Plan, and no further analysis related to potential conflicts with air quality plans is required.

The proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to adherence to the applicable air quality plan than previously analyzed in the General Plan FEIR.

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<sup>17</sup> Bay Area Air Quality Management District (BAAQMD). 2017. Spare the Air, Cool the Climate: Final 2017 Clean Air Plan. April 19.

**b, c) Air Quality Standard, Criteria Pollutants**

Would the project: *(b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation; or (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)?*

The General Plan FEIR concluded that regional air quality impacts would be less than significant with implementation of General Plan Policy OSC-C-1, which includes dust abatement actions as contained in the BAAQMD CEQA Guidelines. However, General Plan FEIR concluded that the General Plan, along with other foreseeable development in the vicinity, would not be consistent with the 2005 Bay Area Ozone Strategy, which would result in cumulative air quality impacts that are significant and unavoidable.

The General Plan FEIR does not evaluate impacts at the project level. Therefore, the following analysis provides an evaluation of potential project level as well as cumulative impacts for the proposed project. These impacts are related to the proposed project's estimated regional criteria pollutant emissions and to the cumulative effect of the proposed project's estimated regional criteria pollutant emissions. The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to CEQA Guidelines Section 15064(h)(4), the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the project's incremental effects would be cumulatively considerable. Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether the project would result in regional emissions that exceed the BAAQMD regional thresholds of significance for construction and operations on a project level. The thresholds of significance represent the allowable amount of emissions each project can generate without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the BAAQMD thresholds of significance on the project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. Construction and operational emissions are discussed separately below.

**Construction Emissions**

During construction, site grading and other earth moving activities would generate fugitive particulate matter (PM) dust (PM<sub>10</sub> and PM<sub>2.5</sub>). The majority of this fugitive PM dust would remain localized and be deposited near the project site. However, given the earthmoving activities associated with the proposed project and all construction activities in general, there is a potential for fugitive dust impacts unless control measures are implemented to reduce the emissions from this source. Operation of the off-road construction equipment and on-road vehicle trips would also generate exhaust-related criteria air pollutant emissions.

**Construction Fugitive Particulate Matter Dust**

The BAAQMD does not recommend a numerical threshold for fugitive PM dust. Instead, the BAAQMD bases the determination of significance for fugitive PM dust on a consideration of the control measures to be implemented. If all appropriate emissions control measures recommended



by the BAAQMD are implemented for a project, then fugitive PM dust emissions during construction are considered to be properly mitigated and thus less-than-significant.

Pursuant to Policy OSC-J-1 of the General Plan, all construction projects are required to implement the current BAAQMD best practices for dust abatement during construction:

**OSC-J-1:** Review all new construction projects and require dust abatement actions as contained in the CEQA Handbook of the Bay Area Air Quality Management District.

The proposed project would implement the Best Management Practices (BMPs) recommended by the BAAQMD as required by General Plan Policy OSC-J-1. Therefore, short-term construction impacts associated with the generation of fugitive PM dust would be below the BAAQMD standards.

**Construction: ROG, NO<sub>x</sub>, PM<sub>10</sub> (exhaust), PM<sub>2.5</sub> (exhaust)**

The BAAQMD 2017 Air Quality Guidelines provide screening criteria developed for criteria pollutants and precursors.<sup>18</sup> According to the BAAQMD 2017 Air Quality Guidelines, if the project meets the screening criteria then its air quality impacts relative to the criteria pollutants may be considered less than significant. In developing the BAAQMD 2017 Air Quality Guidelines, the BAAQMD also considered the emission levels for which a project's individual emissions would be cumulatively considerable. For construction specifically, the proposed project would result in a less than significant impact to air quality if the following screening criteria are met:

1. The project is below the applicable screening level size of 240 dwelling units.
2. All basic construction mitigation measures would be included in the project design and implemented during construction.
3. Construction-related activities would not include any of the following:
  - a) Demolition;
  - b) Simultaneous occurrence of more than two construction phases (e.g., paving and building construction would occur simultaneously);
  - c) Simultaneous construction of more than one land use type (e.g., project would develop residential and commercial uses on the same site) (not applicable to high-density infill development);
  - d) Extensive site preparation (i.e., greater than default assumptions for grading, cut/fill, or earth movement); or
  - e) Extensive material transport (e.g., greater than 10,000 cubic yards of soil import/export) requiring a considerable amount of haul truck activity.

Because the project does not meet all of the screening criteria, construction activities may have the potential to generate significant quantities of air pollutants.

<sup>18</sup> Bay Area Air Quality Management District (BAAQMD). 2017. BAAQMD CEQA Air Quality Guidelines. May.

Construction of the proposed project is anticipated to begin in July 2021 and last through December 2022. However, if the construction schedule moves to later years, construction emissions typically decrease over time because of improvements in technology and more stringent regulatory requirements. Thus, this analysis evaluates the most conservative construction emissions assuming the earliest possible construction period. The preliminary construction schedule is provided in Appendix B.

The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA Guidelines. The construction parameters used in estimating air pollutant emissions are included in Appendix B. Table 9 below summarizes the construction-generated emissions in tons per year, while the construction-related emissions in average daily pounds are shown in Table 10. As provided in Table 10, the BAAQMD's regional emission thresholds for construction exhaust would not be exceeded for any regional pollutant.

**Table 9: Annual Construction Emissions (Unmitigated)**

Construction Year	Tons/Year			
	ROG	NO <sub>x</sub>	PM <sub>10</sub> (Exhaust)	PM <sub>2.5</sub> (Exhaust)
Construction Emissions—2021	0.17	1.85	0.08	0.08
Construction Emissions—2022	1.63	3.17	0.13	0.12
<b>Total Construction Emissions</b>	<b>1.81</b>	<b>5.02</b>	<b>0.22</b>	<b>0.20</b>
Notes: ROG = reactive organic gases      NO <sub>x</sub> = oxides of nitrogen PM <sub>10</sub> = particulate matter 10 microns in diameter (includes only exhaust-related emissions) PM <sub>2.5</sub> = particulate matter 2.5 microns in diameter (includes only exhaust-related emissions) Calculations use unrounded totals. Source of Emissions: Appendix B				

**Table 10: Construction Emissions (Unmitigated Average Daily Emissions)**

Parameter	Air Pollutants			
	ROG	NO <sub>x</sub>	PM <sub>10</sub> (Exhaust)	PM <sub>2.5</sub> (Exhaust)
Total Emissions (total tons)	1.81	5.02	0.22	0.20
Total Emissions (total lbs)	3,613	10,040	431	401
Average Daily Emissions (lbs/day) <sup>1</sup>	9.58	26.63	1.14	1.06
<b>Significance Threshold (lbs/day)</b>	<b>54</b>	<b>54</b>	<b>82</b>	<b>54</b>
<b>Exceeds Significance Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Notes: lbs=pounds      ROG=reactive organic gases      NO <sub>x</sub> =oxides of nitrogen PM <sub>10</sub> =particulate matter 10 microns in diameter (includes only exhaust-related emissions) PM <sub>2.5</sub> =particulate matter 2.5 microns in diameter (includes only exhaust-related emissions) <sup>1</sup> Calculated by dividing the total pounds by the 377 total working days of construction for the duration of construction (July 2021 through December 2022). Calculations use unrounded totals. Source: Appendix B.				

As shown in Table 10, the construction emissions from all construction activities are below the recommended thresholds of significance; therefore, construction of the proposed project would have a less than significant impact with respect to emissions of ROG, NO<sub>x</sub>, exhaust PM<sub>10</sub>, and exhaust PM<sub>2.5</sub>. As previously discussed, the proposed project would implement BMPs recommended by the BAAQMD as a standard condition to reduce potential impacts related to fugitive PM dust emissions during the construction period.

### Long-Term Operational Impacts

The BAAQMD's 2017 Guidelines provide guidance and screening criteria for determining if a project could potentially result in significant air quality impacts. The operational criteria pollutant screening size for a mid-rise apartment land use is 494 dwelling units. The proposed project is well below the BAAQMD's screening threshold at 168 dwelling units, indicating that ongoing project operations would not be considered to have the potential to generate a significant quantity of air pollutants. In conclusion, the construction and operation emissions are below the BAAQMD thresholds. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to air quality standards than previously analyzed in the General Plan FEIR.

#### d) Sensitive Receptors

Would the project: *Expose sensitive receptors to substantial pollutant concentrations?*

The General Plan FEIR determined that implementation of General Plan policies and Mitigation Measure 4.D-4 would ensure impacts would be less than significant. Mitigation Measure 4.D-4 requires sensitive uses within 500 feet of high-volume traffic routes (where daily vehicle counts exceed 100,000) to use heating, ventilation, and air conditioning (HVAC) systems with filtration.

A project would expose sensitive receptors to substantial pollutant concentrations if emissions from the project would exceed ambient air quality standards for criteria pollutants or cause a significant increase in cancer risk from exposure to toxic air contaminants (TACs) at the location of the nearest sensitive receptor.

To the north of the project site is West College Avenue and low-density residential uses, and to the east, south, and west are public/institutional land uses.<sup>19</sup> Residential areas are considered sensitive to air pollution exposure. However, given its residential nature, the proposed project would produce minimal TAC emissions during project operations.

Construction and operational emissions are discussed separately below.

### Construction Emissions

#### Construction TACs

The State of California has determined that diesel particulate matter (DPM) from diesel-fueled engines poses a chronic health risk with chronic (long-term) inhalation exposure and DPM was

<sup>19</sup> City of Santa Rosa. 2019. General Plan Land Use Diagram. July 9. Website: <https://srcity.org/392/General-Plan>. Accessed November 21, 2019.

identified as a TAC by the ARB in 1998. The California Office of Environmental Health Hazard Assessment (OEHHA) recommends using a 70-year exposure duration for determining residential cancer risks. Specifically, current methodological protocols required by the ARB when studying the health risk posed by DPM assume the following: (1) 24-hour constant exposure; (2) 350 days a year; (3) for a continuous period lasting 70 years. Construction-related activities would result in short-term, project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation (e.g., excavation, grading, and clearing), building construction, and other miscellaneous activities.

After project grading and site preparation, only limited use of diesel-powered equipment would be necessary for the aboveground construction portion of the proposed project. Maximum PM<sub>10</sub> and PM<sub>2.5</sub> emissions would occur during site preparation and grading/excavation activities, which require the largest number of heavy-duty diesel equipment. This period is expected to last less than 6 months. PM emissions would decrease for the remaining construction period because construction activities (such as building construction and paving) would require less construction equipment. The grading period would represent less than 1 percent of the total 70-year lifetime exposure period used to estimate health risks. In addition, the proposed project's average daily emissions during the construction period would not exceed the BAAQMD's regional emission thresholds for construction exhaust for any regional pollutant (see Table 10). This further supports the conclusion that the proposed project would not expose sensitive receptors to substantial pollutant concentrations during construction of the proposed project.

## Operational Emissions

### ***Operational Carbon Monoxide Hotspot***

The motor vehicle trips generated by the proposed project would produce carbon monoxide (CO) emissions throughout the regional roadway network. Congested intersections can result in high, localized concentrations of CO that exceed the State or federal ambient air quality standards. Therefore, project-related CO emissions can contribute to CO hotspots (i.e., temporary exceedance of the CO federal or State ambient air quality standard) that could result in an impact to sensitive receptors if traffic volumes and congestion reach high levels. The CO emissions from traffic generated by the proposed project are a concern at the local level.

Table 11 presents the forecasted average daily trips for the proposed project based on the traffic analysis prepared for the project by W-Trans.<sup>20</sup>

**Table 11: Project-specific Trip Generation Rates**

Proposed Land Use	Quantity	Units	Daily Trips (trips/day)
Multi-family Apartments	168	du	914
Notes: du=dwelling units Source: W-Tran. 2020. Traffic Impact Study for the West College Avenue Apartments. August 6.			

<sup>20</sup> W-Trans. 2020. Traffic Impact Study for the West College Avenue Apartments. August 6.

The BAAQMD recommends a screening analysis to determine if a project has the potential to contribute to a CO hotspot. The screening criteria uses conservative assumptions to identify when site-specific CO dispersion modeling is necessary. In other words, if a project does not exceed the screening criteria, it is highly unlikely to exceed the ambient air quality standards. The proposed project would result in a less than significant impact to air quality for local CO if the following screening criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans; or
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; or
- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The City of Santa Rosa does not have a congestion management program. No intersections impacted by the proposed project would experience traffic volumes of 44,000 vehicles per hour in any scenario analyzed in the TIS. Furthermore, the adjacent roadways are not located in an area where vertical or horizontal atmospheric mixing is substantially limited. Therefore, based on the above criteria, the proposed project would not exceed the CO screening criteria.

### ***Project-Specific Operational Toxic Air Pollutants***

The proposed project is residential in nature and would not generate substantial on-site sources of TACs during operation. As described in the TIS, the project is expected to generate 914 weekday vehicle trips.<sup>21</sup> The proposed project would primarily generate trips from residents and visitors traveling to and from the project site, which would primarily be generated by passenger vehicles. Because nearly all passenger vehicles are gasoline-fueled, the proposed project would not generate a significant amount of DPM emissions during operation. Furthermore, these emissions would be dispersed throughout the local roadway network and would not be solely generated at the project site. Therefore, the proposed project would not result in significant health impacts to nearby sensitive receptors during operation.

### ***Project as a Receptor***

The proposed project would locate new sensitive receptors (residents) that could be subject to existing sources of TACs at the project site. However, the California Supreme Court concluded in *California Building Industry Association v. BAAQMD* that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents.

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<sup>21</sup> W-Trans. 2019. Traffic Impact Study for the West College Avenue Apartments. October 9.

The proposed project is not located with 500 feet of high-volume traffic routes where daily vehicle counts exceed 100,000. Therefore, this General Plan FEIR mitigation measure (Mitigation Measure 4.D-4) is not applicable to the proposed project.

The BAAQMD recommends assessing the potential cumulative impacts from sources of TACs within 1,000 feet of a project. To determine the necessity of measures beyond those already proposed for the project through project design features and compliance with regulations, the BAAQMD screening analysis was applied at the project site to evaluate the extent to which existing TACs could adversely affect future residents.

The cumulative health risk results, including health risks from the existing stationary sources, are summarized at the project site in Table 12.

**Table 12: Summary of the Cumulative Health Impacts at the Proposed Project Site**

Source	Source Name/Source Type	Distance from Project Site (feet)	Cancer Risk (per million)	Chronic Hazard Index	PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )
<b>Existing Stationary Sources (BAAQMD Facility Number)<sup>1</sup></b>					
22657	Pacific Gas and Electric	982	0.00	0.000	0.000
100542	California Department of Forestry	170	0.132	0.001	0.000
G6877	Pacific Gas and Electric/Pamalet Macke <sup>2</sup>	870	N/A	N/A	N/A
14160	Pacific Gas and Electric <sup>3</sup>	982	0.00	0.000	0.000
G542	California Department of Forestry <sup>4</sup>	10	N/A	N/A	N/A
17305	Sonoma County Water Agency <sup>5</sup>	10	N/A	N/A	N/A
<b>Existing Roadways<sup>6</sup></b>					
Local Road	West College Avenue	10	2.28	N/A	0.041
Local Road	Stony Point Road	600	1.43	N/A	0.027
<b>Project-level Health Risks</b>					
<b>Maximum Individual Source</b>			<b>2.28</b>	<b>0.001</b>	<b>0.041</b>
<b>BAAQMD Project-level Thresholds of Significance</b>			<b>10</b>	<b>1</b>	<b>0.3</b>
<b>Threshold Exceedance?</b>			<b>No</b>	<b>No</b>	<b>No</b>
<b>Cumulative Health Risks</b>					
<b>Cumulative Total</b>			<b>3.84</b>	<b>0.001</b>	<b>0.068</b>
<b>BAAQMD Cumulative Thresholds of Significance</b>			<b>100</b>	<b>10</b>	<b>0.8</b>
<b>Threshold Exceedance?</b>			<b>No</b>	<b>No</b>	<b>No</b>
Notes:					
<sup>1</sup> Assumes emissions remain constant with time.					
<sup>2</sup> BAAQMD data from December 9, 2019 indicates that Plant No. G6877 has been dismantled.					
<sup>3</sup> BAAQMD data from December 9, 2019 indicate that Plant No. 14160 has been demolished.					
<sup>4</sup> BAAQMD data from December 9, 2019 indicate that Plant No. G542 has been shut down.					
<sup>5</sup> BAAQMD data from December 9, 2019 indicate that Plant No. 17305 has been shut down.					



<sup>6</sup> Cancer risks from existing roadways, calculated using the BAAQMD Roadway Screening Analysis Calculator, were adjusted by a correction factor of 1.3744 to incorporate the latest OEHHA guidance. The source of the correction factor is a BAAQMD recommendation confirmed through personal communication with BAAQMD Environmental Planner, Areana Flores, on January 8, 2020.

BAAQMD=Bay Area Air Quality Management District

N/A=no data available

Source: Appendix B.

As shown in Table 12, the cumulative health impacts to the future on-site residents from existing TAC emission sources located within 1,000 feet of the proposed project would not exceed the BAAQMD's cumulative health significance thresholds.

As described in above, the proposed project would not expose sensitive receptors to substantial pollutant concentrations during either construction or operations. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to exposure of sensitive receptors to substantial pollutant concentrations than previously analyzed in the General Plan FEIR.

#### e) Odors

*Would the project: Create objectionable odors affecting a substantial number of people?*

The General Plan FEIR determined that development proposed under General Plan buildout would place sensitive receptors near uses that could result in odor impacts. However, the General Plan FEIR concluded that implementation of General Plan policies and Mitigation Measure 4.D-4 would reduce impacts to a less significant level.

As stated in the BAAQMD 2017 Air Quality Guidelines, odors are generally regarded as an annoyance rather than a health hazard and the ability to detect odors varies considerably among the populations and overall is subjective. The BAAQMD does not have a recommended odor threshold for construction activities. However, the BAAQMD recommends operational screening criteria that are based on distance between types of sources known to generate odor and the receptor. For projects within the screening distances, the BAAQMD has the following threshold for project operations:

An odor source with five or more confirmed complaints per year averaged over 3 years is considered to have a significant impact on receptors within the screening distance shown in Table 3-3 (of the BAAQMD's guidance).

Two circumstances have the potential to cause odor impacts:

- 1) A source of odors is proposed to be located near existing or planned sensitive receptors, or
- 2) A sensitive receptor land use is proposed near an existing or planned source of odor.

Projects that would site an odor source or a receptor farther than the applicable screening distance, shown in Table 13 below, would not likely result in a significant odor impact.

## Proposed Project Construction

Diesel exhaust and ROGs would be emitted during construction of the proposed project, which are objectionable odors to some receptors; however, emissions would disperse rapidly from the project site and therefore would not create objectionable odors affecting a substantial number of people. Furthermore, these emissions would be short-term and would not be emitted as a single concentrated source. Rather, construction-related exhaust emissions occur as several dispersed sources throughout the project site, which would increase the dilution of those potential odor emissions and reduce the potential for an odor impact.

**Table 13: Odor Screening Distances**

Land Use/Type of Operation	Project Screening Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Source: Bay Area Air Quality Management District (BAAQMD). 2017. CEQA Air Quality Guidelines. May.	

## Proposed Project Operation

### *Proposed Project as an Odor Generator*

Land uses typically associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The proposed project is a residential development project and is not expected to produce any offensive odors that would result in odor complaints. During operation of the proposed project, odors would primarily consist of passenger vehicles traveling to and from the site. These occurrences would not produce objectionable odors affecting a substantial number of people.

### ***Proposed Project as a Receptor***

The Supreme Court found that CEQA requires the analysis of exposing people to environmental hazards **in specific circumstances**, including the location of development near airports, schools near sources of toxic contamination, and certain exemptions for infill and workforce housing. However, placing a development near a source of existing odor source does not need to be evaluated pursuant to CEQA. The Supreme Court also held that public agencies remain free to voluntarily conduct this analysis not required by CEQA for their own public projects (CBIA v. BAAQMD (2016) 2 Cal.App.5<sup>th</sup> 1067, 1083). Therefore, the following information is provided for informational purposes.

As a residential project, the proposed project has the potential to place sensitive receptors near existing odor sources. The project site is located within the project screening distances for several potential source of odor, as defined in Table 13. Public record requests were filed with the BAAQMD to obtain the most recent 3-year odor complaint history for the potential odor generators within the vicinity of the project site; the information obtained from the public record requests is summarized in Appendix B.

There was an average of one confirmed complaint per year based on the odor complaints filed for facilities within the screening distances of the project site average over the most recent 3-year period. This does not exceed the applicable threshold of five confirmed complaints averaged over a 3-year period. For all facilities outlined provided in Appendix B, there are existing residential uses located closer to each facility than the proposed project. If odors would be a large problem at the project site, it would be expected that the number of confirmed complaints for at least one facility listed in Appendix B would be five or more confirmed complaints per year averaged over 3 years. The proposed project is not located within 500 feet of high-volume traffic routes where daily vehicle counts exceed 100,000. As a result, Mitigation Measure 4.D-4 would not apply to the proposed project.

As discussed previously the proposed project would not be expected to emit any significant objectionable odors affecting a substantial number of people during either construction or operations of the project. The proposed project would place sensitive receptors near existing odor sources; however, such sources would not cause substantial odor impacts to the proposed project. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to odors than analyzed in the General Plan FEIR.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>E. Noise</b> <i>Project causes?</i>					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTS	No	No	No	No
b) Generation of excessive groundborne vibration or groundborne noise levels?	LTS	No	No	No	No
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	LTS	No	No	No	No
No Impact; LTS=Less than significant; LTSM=Less than significant with mitigation; SU=Significant and unavoidable					

The analysis in this section is based on supporting information and data contained in Appendix C.

**a) Noise Exposure**

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

The General Plan FEIR determined that implementation of General Plan Policies (NS-B-1 to NS-B-7, NS-B-9, NS-B-10, and NS-B-12 to NS-B-14) would reduce impacts related to construction and operational/stationary noise to less than significant. The General Plan FEIR also determined that implementation of General Plan Policies (NS-B-1 to NS-B-4, NS-B-8, NS-B-9, and NS-B-11) would reduce impacts related to operational/mobile source noise to less than significant.

The General Plan FEIR did not evaluate impacts at the project level. Therefore, the following analysis provides an evaluation of potential project-level impacts with respect to noise exposure.

## Short Term Construction Impacts

### ***Construction-related Traffic Noise***

The transport of workers and construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the site. Because workers and construction equipment would use existing routes, noise from passing trucks would be similar to existing vehicle-generated noise on these local roadways. Proposed project-related construction trips would not be expected to double the hourly traffic volumes along any roadway segment in the project vicinity. For this reason, short-term intermittent noise from construction trips would be minor when averaged over an hour or longer time-period would not result in a perceptible increase in hourly- or daily-average traffic noise levels in the project vicinity.

Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to short-term construction-related noise impacts associated with the transportation of workers and equipment to the project site beyond what was previously analyzed in the General Plan FEIR.

### ***Construction Equipment Operational Noise***

The closest sensitive-noise receptor to the project site are residential land uses located north of the site on West College Avenue. The closest residences would be located approximately 150 feet from the nearest acoustic center of the construction footprint where the heaviest construction equipment would be operating. At this distance, these residential land uses may be exposed to noise levels ranging up to approximately 80 A-weighted decibel (dBA) maximum noise/sound level ( $L_{max}$ ) with a relative worst-case hourly average of 76 equivalent sound level ( $L_{eq}$ ) when construction activities occur at the portion of the project site nearest these homes. Although there could be a relatively high single event noise exposure potential causing an intermittent noise nuisance, the effect of construction activities on longer-term (hourly or daily) ambient noise levels would be small but could result in a temporary increase in ambient noise levels in the project vicinity that could result in annoyance or sleep disturbance of nearby sensitive receptors.

However, the City has established standard conditions that limit hours of construction to 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. Saturdays; no construction is permitted on Sundays and holidays. The proposed project would be required to comply with this restriction of construction activities to these stated time periods which would ensure that construction noise would not result in a substantial temporary increase in ambient noise levels that would result in annoyance or sleep disturbance of nearby sensitive receptors. This standard condition is not unique to the proposed project or site and maintains consistency with the General Plan.

Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to temporary construction operational noise impacts for the proposed project beyond what was previously analyzed in the General Plan FEIR.

## Operational/Stationary Source Noise Impacts

### Mechanical Equipment Operations

Rooftop mechanical ventilation systems could be located as close as 120 feet from the nearest off-site sensitive receptor, a single-family residence located north of the project site, across West College Avenue. In addition, the roof parapet would block the line of sight from all rooftop equipment to off-site receptors, providing a minimum of 6 dBA in shielding reduction. Therefore, noise generated by rooftop mechanical ventilation equipment would attenuate to less than approximately 38 dBA  $L_{eq}$  at the nearest off-site residential receptor. Short-term noise monitoring was conducted on Thursday, November 7, 2019, during midday hours (Appendix C). The daytime ambient noise levels adjacent to West College Avenue are documented through the short-term ambient noise measurement ST-3 to be 72.2 dBA  $L_{eq}$ . Existing 24-hour average traffic noise levels adjacent to West College Avenue are documented through the traffic noise modeling, discussed below, to range up to approximately 65 dBA  $L_{dn}$ . Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to mechanical equipment operation noise impacts beyond what was previously analyzed in the General Plan FEIR.

### Parking Lot Activities

The nearest off-site sensitive receptor to the proposed parking areas is a single-family residence located approximately 150 north of the nearest proposed parking area, across West College Avenue. At this distance, single-event noise levels from parking lot activity could range up to 59 dBA  $L_{max}$  as measured at the nearest receptor. Short-term noise monitoring was conducted on Thursday, November 7, 2019, during midday hours (Appendix C). The daytime ambient noise levels adjacent to West College Avenue are documented through the short-term ambient noise measurement ST-3 to be 72.2 dBA  $L_{eq}$ , with documented maximum noise levels ranging up to 83 dBA  $L_{max}$ . Existing 24-hour average traffic noise levels adjacent to West College Avenue are documented through the traffic noise modeling discussed below to range up to approximately 65 dBA  $L_{dn}$ . Therefore, proposed project-related parking lot activities would not result in an increase in ambient noise levels above existing background noise levels. Therefore, the proposed project would not result in any peculiar effects and would not result in new impacts related to stationary operation noise impacts beyond what was previously analyzed in the General Plan FEIR.

## Operational/Mobile Source Noise Impacts

Table 14 shows a summary of the traffic noise levels for Existing, Existing plus Project, Future, and Future plus Project conditions as measured at 50 feet from the centerline of the outermost travel lane.

**Table 14: Traffic Noise Increase Summary**

Roadway Segment	Existing (dBA) $L_{dn}$	Existing plus Project (dBA) $L_{dn}$	Increase over Existing (dBA)	Future (dBA) $L_{dn}$	Future plus Project (dBA) $L_{dn}$	Increase over Future (dBA)
West College Avenue—Putney Drive to Navarro Street	64.4	64.4	0.0	64.6	64.7	0.1
West College Avenue—Navarro Street to Marlow Road	65.6	65.8	0.2	65.9	66.1	0.2
Source: FCS 2019.						



As shown in Table 14, the highest traffic noise level increase with implementation of the proposed project would occur along West College Avenue between Navarro Street and Marlow Road, under Future plus Project conditions. Along this roadway segment, the proposed project would result in traffic noise levels ranging up to 66.1 dBA  $L_{dn}$  as measured at 50 feet from the centerline of the nearest travel lane, representing an increase of 0.2 dBA over future conditions without the proposed project for this roadway segment. The resulting noise levels are within the conditionally acceptable threshold (as shown in Figure 12-1) in the General Plan for receiving land uses adjacent to this roadway segment. The proposed project-related increase is well below the 3 dBA increase that would be considered a substantial permanent increase in noise levels compared with noise levels that would exist without the proposed project. Therefore, the proposed project would not result in any peculiar effects and would not result in new impacts related to project-related traffic noise levels beyond what was previously analyzed in the General Plan FEIR.

Consistent with the General Plan FEIR, the proposed project would comply with General Plan Policies NS-B-1 to NS-B-7, NS-B-9, NS-B-10, and NS-B-12 to NS-B-14, which regulate operational/stationary noise, and General Plan Policies NS-B-1 to NS-B-4, NS-B-8, NS-B-9, and NS-B-11, which regulate operational/mobile sources. With implementation of these policies, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to short-term construction-related noise impacts, temporary construction operational noise impacts, mechanical equipment operation noise impacts, stationary operation noise impacts, or proposed project-related traffic noise levels beyond what was previously analyzed in the General Plan FEIR.

**b) Groundborne Vibration**

Would the project result in: *Generation of excessive groundborne vibration or groundborne noise levels?*

The General Plan FEIR determined that implementation of policies contained in the General Plan (NS-B-1 to NS-B-3 and NS-B-9) would reduce the potential for excessive groundborne vibration or groundborne noise levels to a less than significant impact.

The General Plan FEIR did not evaluate impacts at the project level. Therefore, the following analysis provides an evaluation of potential project-level impacts with respect to groundborne vibration.

***Short-term Construction Vibration Impacts***

The nearest off-site structure to the project site construction footprint is a CAL FIRE Santa Rosa Station storage structure located west of the project site. The façade of this building would be located approximately 15 feet from the nearest construction footprint where the heaviest construction equipment would potentially operate. At this distance, groundborne vibration levels would range up to 0.217 in/sec peak particle velocity (PPV) from operation of the types of equipment that would produce the highest vibration levels. This is well below the Federal Transit Administration (FTA) Construction Vibration Impact Criteria of 0.3 in/sec PPV for buildings of engineered concrete and masonry of which the storage unit would be equivalent to due to the stability of the structure's sturdy metal frame. Additionally, the nearest off-site receptor where people could be working or inhabiting is the CAL FIRE Santa Rosa Station building's façade located

approximately 110 feet west of the project site where the heaviest construction equipment would operate. At this distance, groundborne vibration levels would range up to 0.011 in/sec PPV from operation by equipment that would produce the highest vibration. This is well below the FTA's Construction Vibration Criteria of 0.2 in/sec PPV for buildings of non-engineered timber and masonry buildings.

Therefore, the proposed project would not result in any peculiar effects and would not result in new impacts related to short-term groundborne vibration associated with construction to off-site receptors beyond what was previously analyzed in the General Plan FEIR.

### **Operational Vibration Impacts**

Implementation of the proposed project would not include any permanent sources of vibration that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the vicinity of the project site.

Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to short-term groundborne vibration or operational groundborne vibration beyond what was previously analyzed in the General Plan FEIR.

### **c) Airport Noise**

Would the project result in:

*For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, exposure of people residing or working in the project area to excessive noise levels?*

The General Plan FEIR determined that implementation of policies contained in the General Plan (T-M-3) would reduce the potential of excessive airport noise levels from airport activity to a less than significant impact.

The nearest public airport to the project site is the Charles M. Schulz-Sonoma County Airport, located approximately 4.8 miles northwest of the project site. General Plan EIR Figure 4.E-2 indicates that the project site is outside of the 65 dBA  $L_{dn}$  airport noise contour and 60 dBA  $L_{dn}$  future noise contour, which is consistent with the conclusion of the General Plan FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to airport noise beyond what was previously analyzed in the General Plan FEIR.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>F. Biological Resources</b> <i>Would the project:</i>					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	LTS	No	No	No	No
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	LTS	No	No	No	No
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	LTS	No	No	No	No
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?	LTS	No	No	No	No
e, f) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?	LTSM	No	No	No	No
No Impact; LTS=Less than significant; LTSM=Less than significant with mitigation; SU=Significant and unavoidable					

The analysis in this section is based on the site-specific Biological Resources Constraints Analysis prepared by Monk & Associates, Inc. on March 18, 2019. In addition, descriptions and analyses in this section are based on results from the CDFW California Natural Diversity Database (CNDDDB) as well as a site visit performed by FCS Biologist, Robert Carroll, on November 8, 2019. All supporting material is included as Appendix D.

**a) Special Status Species**

Would the project: *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?*

The General Plan FEIR determined that implementation of policies contained in the General Plan (OSC-A-2, OSC-D-1, OSC-D-2, OSC-D-3, OSC-D-4, OSC-E-1, and OSC-E-2) and Citywide Creek Master Plan (HA-5-1 and HA-5-2) would reduce potential impacts to special-status species associated with the buildout of development under the General Plan to a less than significant level.<sup>22</sup>

Special-status plant and wildlife species typically occur in undeveloped areas. Although it is less likely, special-status plants and wildlife species may occur within urbanized areas. The project site is currently developed with three vacant office buildings and associated parking lots. The site contains overgrown vegetation and ornamental trees. College Creek is located along the eastern and southern project site boundaries and contains a riparian corridor with mature valley oaks.<sup>23</sup> Existing roadways and other urban uses surround the site. Ornamental trees planted within the project site include species such as London planetree (*Platanus acerifolia*), privet (*Ligustrum* sp.), blue gum (*Eucalyptus globulus*) and black wattle (*Acacia mearnsii*). In addition to the non-native ornamentals, various native trees were planted on-site as part of the landscaping, such as redwood (*Sequoia sempervirens*), coast live oak (*Quercus agrifolia agrifolia*), and valley oak (*Quercus lobata*).

**Special-status Plant Species**

No special-status plants have been mapped on the project site. However, according to the CDFW CNDDDB, 11 special-status plant species are known to occur in the region of the project site (Table 3 of the Biological Resources Report, Appendix D). There are no native, naturalized, or sensitive plant communities on-site that could provide habitat for special-status plant species. Thus, it is highly unlikely that special-status plants would occur on this project site. Furthermore, there are no “suitable habitats” for special-status plants on-site. Therefore, no impacts to the federally listed plant species would occur from project site redevelopment.

**Special-status Wildlife Species**

*Pallid Bat*

The removal of trees and abandoned buildings may result in a reduction of potential bat roosting habitat. Construction-related activities may cause disturbance to bats roosting in trees and buildings

<sup>22</sup> Environmental Science Associates (ESA, Inc.). 2009. Santa Rosa General Plan 2035 Draft Environmental Impact Report (prepared for the City of Santa Rosa). March.

<sup>23</sup> Monk & Associates. 2019. Biological Resources Constraints Analysis. March.

scheduled to be removed. The loss of a nursery site or maternity colony for any bat species, regardless of the species' status, would constitute a potentially significant impact. Adherence to best practices described in the Project Description would ensure there would be no long-term effects on bats by requiring surveys prior to commencement of demolition or construction activities and, if bats are present, requiring any necessary buffer zones to be established by a qualified biologist.

#### *Nesting Birds*

The mature trees on-site could provide habitat for nesting birds. Construction activities such as tree removal could disturb nesting and breeding birds in trees and shrubs within and around the construction site. Potential impacts to special-status and migratory birds during construction include the destruction of eggs or occupied nests, mortality of young, and the abandonment of nests with eggs or young birds prior to fledging. The Project Description notes that construction will commence outside of the nesting season, but also lists best practices that would be implemented if an active nest is identified. Adherence to avoidance and minimization measures as described in the Project Description would ensure nesting birds are protected in accordance with current best practices.

Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to special-status species beyond what was previously evaluated in the General Plan FEIR.

#### **b) Sensitive Natural Communities**

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

The General Plan FEIR determined that implementation of policies contained in the General Plan (OSC-A-2, OSC-B-3, OSC-D-1, OSC-D-2, OSC-D-4, OSC-D-5, OSC-D-6, OSC-D-7, OSC-D-8, OSC-D-9, OSC-D-11, OSC-D-12, OSC-E-1, and OSC-E-2) and Citywide Creek Master Plan (HA-1-1 and HA-1-2) would reduce potential impacts to streams, riparian areas, and other sensitive communities associated with buildout of development under the General Plan to a less than significant level.

The CDFW typically considers its jurisdiction to include a river or stream to top of bank and the upland edge of the riparian vegetation dripline. Thus, any proposed activity in a natural stream channel that would substantially adversely affect an existing fish and/or wildlife resources, including its riparian vegetation, would require entering into a Streambed Alteration Agreement with the CDFW prior to commencing work within a stream. College Creek is located along the eastern and southern project site boundaries and contains a riparian corridor with mature valley oaks. The development would not impact College Creek or its associated riparian corridor, as the proposed project (aside from the trail extension) would maintain a 10-foot minimum setback from the Creekside easement boundary. The proposed project would utilize the existing outfalls into College Creek and the storm drain system in West College Avenue; thus, no work related to the storm drainage system would impact College Creek.<sup>24</sup> The existing creekside trail would be extended north

<sup>24</sup> Monk & Associates. 2019. Biological Resources Constraints Analysis. March.

to West College Avenue; this extension would be within the Creekside easement boundary. However, the extension of this trail would not result in the removal of any riparian vegetation.

Therefore, the proposed project would not result in any peculiar effects and would not introduce new or more severe impacts related sensitive natural communities beyond what was previously evaluated in the General Plan FEIR.

**c) Wetlands**

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

The General Plan FEIR determined that implementation of policies contained in the General Plan (OSC-D-1, OSC-D-2, OSC-D-4, and OSC-D-5) would reduce potential impacts to wetlands (specifically vernal pools) associated with development under the General Plan to a less than significant level.

The project site is mostly hardscaped and surrounded by development. The project area does not support any wetlands under federal or State jurisdiction. As a result, the proposed project would not result in any peculiar effects and would not introduce new or more severe impacts related to State or federally protected wetlands beyond what was evaluated in the General Plan FEIR.

**d) Fish and Wildlife Movement Corridors**

Would the project: *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites?*

The General Plan FEIR determined that implementation of General Plan Policies OSC-A-2, OSC-D-1, OSC-D-2, OSC-D-3, OSC-D-4, OSC-E-1, and OSC-E-2, would reduce impacts to habitat areas and wildlife movement corridors to a less than significant level.

The project site is extensively developed containing pavement, buildings, and non-native ornamental landscaping and does not contain habitat that would represent a significant wildlife corridor. The proposed project would not contribute to the permanent loss of roosting habitat, habitat fragmentation, or a loss of suitable foraging habitat. However, removal of trees and abandoned buildings may result in a reduction of potential bat roosting habitat. Construction-related activities may cause disturbance to bats roosting in trees and buildings scheduled to be removed. Implementation of avoidance and minimization measures as included in the Project Description would ensure there would be no long-term effects on bats by requiring surveys prior to commencement of demolition or construction activities and, if bats are present, requiring any necessary buffer zones to be established by a qualified Biologist.

The mature trees on-site could provide habitat for nesting birds. Construction activities such as tree removal could disturb nesting and breeding birds in trees and shrubs within and around the construction site. Adherence to avoidance and minimization measures as described in the Project



Description would ensure nesting raptors are protected. Therefore, the proposed project would not result in any peculiar effects and would not introduce new or more severe impacts related to fish and wildlife movement corridors beyond what was evaluated in the General Plan FEIR.

**e, f) Local Biological Resources Policies/Ordinances Consistency and Habitat/Natural Community Conservation Plan Consistency**

Would the project: *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?*

**Tree Preservation Policy or Ordinance**

The General Plan FEIR noted that Santa Rosa Municipal Code Ordinance 2858 Sections 17-14-.030 through 17-14.070, which implement policies set forth in the General Plan, includes tree protection measures and describes conditions in which a permit is required to remove or alter any tree and tree alteration/relocation/removal requirements on properties proposed for development. The General Plan FEIR concluded that there would be less than significant impacts to biological resources, including trees, with adherence to General Plan policies and determined that impacts associated with local policies or ordinances protecting local biological resources is less than significant.

With respect to the project, the General Plan and Municipal Code Sections 17-24.030 through 17-24.070 establish protections for trees. As a part of approval for on-site development, the project applicant is required to demonstrate and implement consistency with the General Plan and these sections of the Municipal Code, including tree removal permits and protection of maintained trees. These actions would help to ensure that impacts to protected trees within the project site would be minimized to the maximum extent feasible. Therefore, the proposed project would not result in any peculiar effects and would not introduce new or more severe impacts related to local biological resources policies and ordinances consistency beyond what was previously evaluated in the General Plan FEIR.

**Channelized Waterways**

Section 20-30.040(D)(3) of the Municipal Code regulates fully channelized waterways that are under the control of Sonoma Water.

**Section 20-30.040(D)(3) Channelized Waterway:** Where a fully channelized waterway exists and the channel is owned by, or under the control of Sonoma Water, structures may be closer to the top of the bank than a distance of 2.5 times the depth of the bank plus 50 feet, provided that this encroachment into the setback area will not obstruct or impair the channel's hydraulic functions, impede Sonoma Water access or maintenance of the channel, or impair the stability of the slope, bank, or maintenance of the channel, or impair the stability of the slope, bank, or creek bed foundation, all as determined by and approved by the Public Works Department, and Sonoma Water.

The General Plan FEIR includes policies that regulate channelized waterways including OSC-D-7 and OSC-D-8 and Section 20-30.040 implements these General Plan policies and establishes setback for

the protection of creeks. The General Plan FEIR did not indicate that implementation of these policies would conflict with other existing policies or ordinances protecting biological resources and impacts would be less than significant.

Section 20-30.040(D)(3) regulates man-made and channelized waterways, and College Creek is a channelized waterway within the boundaries of the project site that is under the control of Sonoma Water. Therefore, the proposed project would have to adhere to General Plan Policies OSC-D-7 and OSC-D-8 as well as the Municipal Code. Sonoma Water has approved the project applicant's proposal and proposed setback, inclusive of extending the creekside trail extension within Sonoma Water easement. Therefore, the proposed project complies with the Municipal Code and the proposed project would not result in any peculiar effects and would not introduce new or more severe impacts related to local biological resources policies and ordinances consistency beyond what was previously evaluated in the General Plan FEIR.

### **Habitat/Natural Community Conservation Plan**

The General Plan FEIR concluded that Mitigation Measure 4.F-5, which requires the adherence to the Santa Rosa Plain Conservation Strategy<sup>25</sup> and the USFWS Programmatic Biological Opinion, would reduce potential impacts associated with buildout of development under the General Plan to a less than significant level. Mitigation Measure 4.F-5 pertains only to areas with suitable habitat for certain specified sensitive species.

The project site is located within the Santa Rosa Plain Conservation Strategy study area with the Strategy Designation "already developed (no potential for impact)."<sup>26</sup> Because the project site does not contain habitat for the sensitive species included in Mitigation Measure 4.F-5, this mitigation measure is not applicable to the proposed project. Therefore, the proposed project would not result in any peculiar effects and would not introduce new or more severe impacts related to habitat/natural community conservation plan consistency beyond what was previously evaluated in the General Plan FEIR.

<sup>25</sup> United States Fish and Wildlife Service (USFWS). 2005. Sacramento Fish and Wildlife Office. Santa Rosa Conservation Strategy. Website: [https://www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/Documents/Title\\_Page.pdf](https://www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/Documents/Title_Page.pdf). Accessed December 26, 2019.

<sup>26</sup> United States Fish and Wildlife Service (USFWS) formerly known as California Department of Fish and Game. 2007. Santa Rosa Plain Conservation Strategy Map. Website: [https://www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/Documents/figure-3\\_REVISSED\\_4-18-07.pdf](https://www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/Documents/figure-3_REVISSED_4-18-07.pdf). Accessed December 26, 2019.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>G. Utilities and Service Systems</b> <i>Would the project:</i>					
a) Result in increased wastewater flows that exceed current treatment capacity.	LTS	No	No	No	No
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.	LTS	No	No	No	No
c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	LTS	No	No	No	No
d) Have insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements necessary.	LTS	No	No	No	No
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.	LTS	No	No	No	No
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.	LTS	No	No	No	No
g) Comply with federal, State, and local statutes and regulations related to solid waste.	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

**a, b, e) Wastewater Treatment Expansion and Water Expansion**

Would the project: *(a) Result in increased wastewater flows that exceed current treatment capacity?; (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?; or (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?*

The General Plan FEIR evaluated potential impacts to wastewater treatment capacity and standards and determined that implementation of General Plan policies would ensure impacts to wastewater flows and current treatment capacity would be less than significant. The General Plan FEIR also evaluated the necessity of construction new water or water treatment facilities or the expansion of existing facilities and concluded that supply expansion measures and General Plan policies would address the potential for inadequate water supply and impacts would be less than significant.

**Wastewater**

The proposed project would increase wastewater generation compared to existing conditions. However, the proposed project would result in similar land uses and wastewater generation as what was analyzed in the General Plan FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to wastewater treatment capacity beyond what was previously analyzed in the General Plan FEIR.

**Water**

As discussed under Impact G(d), proposed project-specific water demand was calculated to be 1,040 acre-feet per year (AFY), less than 3 percent of total demand at General Plan buildout. The General Plan FEIR determined the City of Santa Rosa would have a total water supply of 38,486 AFY in 2035. Total water demand for General Plan buildout was 36,186 AFY (which includes the proposed project). As a result, the City would have sufficient water supplies to serve the proposed project and would not require new or expanded water treatment facilities. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more serve impacts related to water treatment facilities beyond what was previously analyzed in the General Plan FEIR.

**c) Stormwater System Capacity**

Would the project: *Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

The General Plan FEIR determined that increased urban development as part of General Plan buildout could increase stormwater generation and the need for stormwater drainage facilities. The General Plan FEIR noted that General Plan Policies PSF-I-1 through PSF-I-5 would ensure that developers would cover the costs of upgrades to drainage facilities and maintenance of existing stormwater drainage facilities would be required as a condition of approval for future development. Additionally, the General Plan FEIR noted that Policies NS-D-3, NS-D-4, and NS-D-5 require future

development to include design standards consistent with the Standard Urban Storm Water Mitigation Plan (SUSMP) plan and the use of stormwater BMPs, such as permeable paving, in order to reduce stormwater flows. The General Plan FEIR concluded that with implementation of General Plan policies impacts to stormwater system capacity would be less than significant. The proposed project includes land uses that are consistent with what was envisioned in the General Plan and would adhere to the General Plan policies discussed above. In addition, the proposed project would include Low Impact Development (LID) stormwater retention facilities that would ensure stormwater runoff generated by the proposed project would be equal to or less than existing stormwater volumes and rates. The proposed project would also be required to obtain all applicable permits related to stormwater generation during construction, which would include the completion of a SUSMP. Therefore, the proposed project would not result in any peculiar effects and would not introduce new or more severe impacts related to stormwater system capacity beyond what was previously evaluated in the General Plan FEIR.

**d) Water Supply**

Would the project: *Have insufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements necessary?*

The General Plan FEIR assessed future water demands and prepared a Water Supply Assessment (WSA) in order to determine if the City would be able to provide sufficient water supplies for future residents based on General Plan buildout. The General Plan FEIR determined the City of Santa Rosa would have a total water supply of 38,486 AFY in 2035. Total demand for General Plan buildout was concluded to be 36,186 AFY (which includes the proposed project). Therefore, as indicated in the WSA, the City would have adequate water supply, including existing and additional supply, to meet planned future development demands plus the maximum anticipated demands from the General Plan.

Project-specific water demand was calculated to be 1,040 AFY, less than 3 percent of total demand at General Plan buildout. Although the proposed project would increase water demand compared to existing conditions, the proposed project would be within the maximum allowable density for Medium High-Density Residential uses (18-30 du/acre). As a result, the proposed project would result in a water demand similar to what was evaluated in the General Plan FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to water supply beyond what was previously analyzed in the General Plan FEIR.

**f) Landfill Capacity**

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

The General Plan FEIR determined that the City would have adequate landfill capacity with the implementation of General Plan policies and County and City waste diversion measures.

Because the proposed project includes land use and density that were evaluated in the General Plan FEIR, the proposed project would generate solid waste similar to what was envisioned in the General

Plan FEIR. In addition, the proposed project would comply with General Plan policies, such as including compost bins that would reduce waste and improve waste diversion rates. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to solid waste capacity beyond what was previously analyzed in the General Plan FEIR.

**g) Solid Waste**

Would the project: *Comply with federal, State, and local statutes and regulations related to solid waste?*

The General Plan FEIR determined that the City would implement General Plan policies as well as County and City waste diversion measures in order to meet State statutes.

Consistent with the General Plan FEIR, the proposed project would comply with General Plan policies as well as County and City waste diversion measures. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to solid waste regulations beyond what was previously analyzed in the General Plan FEIR.



Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>H. Hydrology and Water Quality</b> <i>Would the project:</i>					
a) Violate any water quality standards or waste discharge requirements?	LTS	No	No	No	No
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).	LTS	No	No	No	No
c) Substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation within or outside of the planning area.	LTS	No	No	No	No
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 within or outside of the planning area.	LTS	No	No	No	No
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	LTS	No	No	No	No
f) Otherwise substantially degrade water quality.	LTS	No	No	No	No
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.	LTS	No	No	No	No
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows.	LTS	No	No	No	No

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse 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.	LTS	No	No	No	No
j) Expose people or structures to a significant risk of inundation by seiche, tsunami, or mudflow.	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

**a, f) Water Quality Standard Violation, Degradation**

Would the project: *(a) Violate any water quality standards or waste discharge requirements; or (f) Otherwise substantially degrade water quality?*

The General Plan FEIR determined that new development anticipated by General Plan buildout would result in greater nonpoint sources (such as oils and exhaust from cars) of stormwater pollution that could degrade water quality. However, the General Plan FEIR concluded that implementation of General Plan policies would ensure impacts to water quality standards would be less than significant and projects developed within the General Plan would not violate water quality standards or waste discharge requirements.

The proposed project has the potential to release water pollutants during both construction and operation that may violate water quality standards and degrade surface or groundwater quality. The proposed project would implement General Plan policies (including those that require consistency with the City's SUSMP) while developing the site and during project operation. Furthermore, the proposed project would be required to prepare and comply with a Storm Water Pollution Prevention Plan (SWPPP), as outlined within City Municipal Code Section 17-12.170. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to water quality standard violation and degradation beyond what was previously analyzed in the General Plan.

**b) Groundwater Supplies**

Would the project: *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?*

The General Plan identified that 90 percent of the City's water supply is from Sonoma Water entitlements via the Russian River and only 1 percent of the City's water supply is from groundwater wells and would only be used in case of emergency. The General Plan FEIR concluded that the City would have 38,486 AFY of water available, while demand would be 37,226 AFY. As a result, the General Plan FEIR determined that the City would not need to expand its use of groundwater as a water supply source and impacts would be less than significant.

The proposed project would not include groundwater wells and would connect to existing potable water lines contained within West College Avenue. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to groundwater supplies beyond what was previously analyzed in the General Plan FEIR.

**c) Drainage Pattern Alteration—Erosion or Siltation**

Would the project: *Substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation within or outside of the planning area?*

The General Plan FEIR determined that impacts related to drainage pattern alteration resulting in erosion or sedimentation would be less than significant with implementation of General Plan policies, which include BMPs.

Consistent with the General Plan policies, the proposed project would be required to implement erosion and sedimentation control measures, such as a SWPPP, during construction and operation as well as a SUSMP. The proposed project would include stormwater retention basins at operation that would be designed according to the City of Santa Rosa Low Impact Development Technical Design Manual in order to prevent erosion and siltation. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to drainage pattern alteration with respect to erosion and sedimentation beyond what was previously analyzed in the General Plan FEIR.

**d) Drainage Pattern Alteration—Flooding**

Would the project: *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding within or outside of the planning area?*

The General Plan FEIR determined that impacts related to drainage pattern alteration resulting in downstream flooding would be less than significant with implementation of General Plan policies, which include BMPs.

The project site is currently paved and covered in impervious surfaces with no stormwater retention facilities. Consistent with General Plan policies, the proposed project would include stormwater retention facilities throughout the project site that would detain and meter stormwater such that the proposed project would not generate stormwater volumes or rates greater than existing

conditions. The proposed project would be required to implement design standards and a SUSMP that would reduce stormwater generation during construction and operation to the maximum extent practicable. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to drainage pattern alteration with respect to flooding beyond what was previously analyzed in the General Plan FEIR.

**e) Drainage System Capacity**

Would the project: *Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The General Plan FEIR determined that storm drainage problems exist in less developed areas in the southern and western portions of the city and concluded that implementation of General Plan policies would ensure impacts related to stormwater drainage system capacity would be less than significant and the development of the General Plan and adherence to BMPs would help control polluted runoff.

The project site is highly developed and covered with paved areas and impervious surfaces. The proposed project would include stormwater retention facilities throughout the project site consistent with City of Santa Rosa Low Impact Development Technical Design Manual that would detain and meter stormwater such that the proposed project would not generate stormwater volumes or rates greater than existing conditions. In addition, the proposed project would be required to comply with General Plan policies, which includes implementation of a SWPPP and SUSMP and the use of BMPs. Compliance with General Plan policies would reduce stormwater generation and the addition of additional sources of polluted runoff during construction and operation to the maximum extent practicable. Furthermore, the proposed project would include a land use that is consistent with what was envisioned in the General Plan. As a result, the proposed project would not result in additional stormwater release that was not anticipated in the General Plan. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to stormwater drainage capacity or polluted stormwater runoff beyond what was previously analyzed in the General Plan FEIR.

**g, h) Housing or Structures in Flood Hazard Area**

Would the project: *(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; or (h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?*

The General Plan FEIR concluded that implementation of General Plan policies and implementation programs would reduce impacts related to flood hazard areas to less than significant.

The project site is located in Federal Emergency Management Agency (FEMA) Zone X—"Area of Minimal Flood Hazard."<sup>27</sup> The closest flood hazard zone is located 1.2 miles to the west, and therefore, the project does not propose development within existing 100-year flood hazard areas. This condition precludes the potential for new impacts associated with 100-year flood hazards. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more serve impacts related to placing housing or structures in flood hazard areas beyond what was previously analyzed in the General Plan FIER.

**i) Levee or Dam Failure**

Would the project: *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?*

The General Plan FEIR determined that there are several reservoirs with dam failure inundation zones located within the Santa Rosa planning area but that impacts would be less than significant with implementation of General Plan policies and adherence to Division of Safety of Dams regulations.

The project site is not located within a dam failure inundation zone and the closest zone is located approximately 1.5 miles to the west of the project site.<sup>28</sup> This condition precludes the potential for new impacts associated with dam failure inundation. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to flooding due to dam failure beyond what was previously analyzed in the General Plan FEIR.

**j) Seiche, Tsunami, Mudflow**

Would the project: *Expose people or structures to a significant risk of inundation by seiche, tsunami, or mudflow?*

The General Plan FEIR concluded that the City of Santa Rosa would not be subject to inundation by tsunami or seiche because it is not located near the Pacific Ocean or any large body of fresh water that could be expected to overtop its banks during an earthquake and, therefore, related impacts would be less than significant.

The project site is located in a flat area within the City of Santa Rosa and as such is not subject to impacts related to flooding due to a tsunami, seiche, or mudflow. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to flooding due to a tsunami, seiche, or mudflow beyond what was previously analyzed in the General Plan FEIR.

<sup>27</sup> Federal Emergency Management Agency (FEMA). Flood Map Service Center Search by Address.

<sup>28</sup> Sonoma County. Sonoma County Hazard Mitigation Plan, Figure 8.7. 2011.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>I. Public Services</b> <i>Would the project:</i>					
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
i) Fire Protection	LTS	No	No	No	No
ii) Police Protection	LTS	No	No	No	No
iii) Schools	LTS	No	No	No	No
iv) Parks	LTS	No	No	No	No
v) Other Public Facilities	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

**i) Fire Protection**

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

The General Plan FEIR determined that new development under General Plan buildout would increase demand for fire protection services as well as response times for emergency vehicles but concluded that implementation of General Plan policies would ensure impacts would be less than significant.

The proposed project would include housing on a project site designated for Medium High-Density Residential uses consistent with what was envisioned in the General Plan and evaluated in the General Plan FEIR. Although the proposed project's new residents would increase demand for fire protection services compared to existing conditions, that demand was analyzed in the General Plan FEIR and it was determined to be less than significant with the implementation of General Plan policies. In addition, the proposed project would be required to comply with City of Santa Rosa Special Tax Financing Code provisions, including Section 4-56.240 and would, therefore, be required to make a fair-share contribution to reserve funds for the replacement of public facilities, including fire protection and suppression services. As such, the proposed project would not result in the need for new or expanded fire facilities to serve the project. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to fire protection services beyond what was previously analyzed in the General Plan FEIR.

## ii) Police Protection

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

The General Plan FEIR determined that new development under General Plan buildout would increase demand for police protection services as well as response times for emergency vehicles but concluded that implementation of General Plan policies would ensure impacts would be less than significant.

The nearest police station to the project site is Santa Rosa Police Department located approximately 3.1 miles to the east of the project site. The proposed project would include housing on a project site designated for Medium High-Density Residential uses consistent with what was envisioned in the General Plan and evaluated in the General Plan FEIR. Although the proposed project's new residents would increase demand for police protection services compared to existing conditions, that demand was analyzed in the General Plan FEIR and it was determined to be less than significant with the implementation of General Plan policies. In addition, Section 21-02.090 of the Santa Rosa City Code establishes a housing impact fee for residential housing developments, which would allow the Santa Rosa Police Department to accommodate for any increased demand in public services, including police services.<sup>29</sup> Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to police protection services beyond what was previously analyzed in the General Plan FEIR.

## iii) Schools

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: Schools?*

The General Plan FEIR determined that many schools in the City of Santa Rosa were at or near capacity. The General Plan FEIR concluded that the payment of school impact fees consistent with State and local regulations and compliance with General Plan policies would ensure impacts to schools would be less than significant.

The proposed project would include housing on a project site designated for Medium High-Density Residential uses consistent with what was envisioned in the General Plan and evaluated in the General Plan FEIR. Although the proposed project's new residents would increase the amount of school-aged children that would attend local schools compared to existing conditions, that demand was analyzed in the General Plan FEIR and, consistent with the General Plan FEIR, the payment of impact fees and compliance with General Plan policies would reduce impacts to a less than

<sup>29</sup> City of Santa Rosa. 2012. Santa Rosa City Code. November. Website: <http://qcode.us/codes/santarosa/?view=desktop>. Accessed December 26, 2019.



significant level. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to the development of new or expanded school facilities beyond what was previously analyzed in the General Plan FEIR.

### iii) Parks

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

The General Plan FEIR determined that the City would need to have 1401.12 acres of recreational area in the year 2035 to meet its standard of 3.5 acres of parkland per 1,000 residents. The General Plan FEIR concluded that development of all undeveloped and proposed park facilities would ensure a park standard of 3.7 acres of parks per 1,000 residents and impacts would be less than significant.

The proposed project would include an extension of the existing pedestrian trail adjacent to College Creek in order to connect the trail to West College Avenue. In addition, the proposed project would include park-like amenities including a pool, barbeque area, and children's play area. Pursuant to Section 19-70.090 of the Santa Rosa City Code, the project applicant would provide the City in lieu-of fees for the development of parkland elsewhere.<sup>30</sup> Although the proposed project's new residents would increase demand for park facilities compared to existing conditions, that demand was analyzed in the General Plan FEIR and impacts were found to be less than significant. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to the expansion of park facilities beyond what was previously analyzed in the General Plan FEIR.

### iii) Other Public Services

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

The General Plan FEIR determined that new development within the plan area could increase the need for new or expanded governmental facilities. The General Plan FEIR concluded that General Plan Policies GM-A-1 and GM-B-4 would ensure that new development is located in areas within the City with existing services and facilities that could adequately serve development and impacts would be less than significant. The proposed project would include housing on a project site designated for Medium High-Density Residential uses consistent with what was envisioned in the General Plan and evaluated in the General Plan FEIR. Although the proposed project's new residents would increase demand for other public facilities compared to existing conditions, Section 21-02.090 of the Municipal Code establishes a housing impact fee for residential housing developments, which will account for any increased demand in public services.<sup>31</sup> The payment of impact fees is not unique to the proposed

<sup>30</sup> City of Santa Rosa. 2012. Santa Rosa City Code. November. Website: <http://qcode.us/codes/santarosa/?view=desktop>. Accessed December 26, 2019.

<sup>31</sup> Ibid.

project or site and maintains consistency with the General Plan. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to other public facilities beyond what was previously analyzed in the General Plan FEIR.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>J. Cultural and Paleontological Resources</b> <i>Would the project:</i>					
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.	LTS	No	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	LTS	No	No	No	No
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	LTS	No	No	No	No
d) Disturb any human remains, including those interred outside of formal cemeteries.	LTS	No	No	No	No
No Impact; LTS=Less than significant; LTSM=Less than significant with mitigation; SU=Significant and unavoidable					

The analysis in this section is based on the site-specific Cultural Resources Study prepared by Tom Origer & Associates on November 15, 2019, and a Paleontological Records Search prepared by Kenneth L. Finger, PhD, on December 3, 2019. All supporting material is included as Appendix E.

### Native American Heritage Commission Sacred Lands File Record Search and Tribal Consultation

Tom Origer & Associates sent a letter to the Native American Heritage Commission (NAHC) in an effort to determine whether any sacred sites are listed on its Sacred Lands File for the project site. A response from the NAHC was received on October 9, 2019, indicating that the Sacred Lands File search failed to indicate the presence of Native American cultural resources in the immediate project area. The NAHC included a list of seven local tribal representatives available for consultation. To ensure that all Native American knowledge and potential prehistoric concerns about the proposed project are addressed, a letter containing project information and requesting any additional information was sent to each tribal representative.

A response was received from the Federated Indians of Graton Rancheria on October 16, 2019, stating that the project area is within ancestral territory and they requested the results of research efforts and recommendations. In addition, a response was received from the Lytton Rancheria of California on November 5, 2019, stating that the tribe has no additional information. However, the

Tribe believes the project area is within their traditional Pomo territory and they would like to be in consultation with the lead agency regarding the proposed project.

**a) Change to Historic Resource**

Would the project: *Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?*

The General Plan FEIR determined that significant impacts to historical resources could occur due to future buildout. However, the General Plan FEIR concluded that implementation of Policies HP-B-1, HP-B-2, and HP-B-4 would ensure individual projects demonstrate general consistency with federal, State, and local regulations related to historical resources.

The archival record search and field survey concluded that there were outbuildings located on the project site as early as 1922, but were demolished after 1982. In addition, the Cultural Resources Study prepared for the proposed project determined that the on-site buildings associated with Sonoma Water were built in 1982 and as such are not old enough to be considered eligible for the California Register of Historical Resources or the National Register of Historic Places.

Therefore, the site's features do not meet federal or State historical significance criteria. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to historical resources beyond what was previously analyzed in the General Plan FEIR.

**b) Change to Archaeological Resource**

Would the project: *Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

The General Plan FEIR determined that significant impacts to archaeological resources could occur due to future buildout. However, the General Plan FEIR concluded that implementation of Policies HP-A-1 through HP-A-5 would ensure individual projects demonstrate general consistency with federal, State, and local regulations related to archaeological resources.

The records search results from the Northwest Information Center (NWIC) obtained by Tom Origer & Associates on October 10, 2019, indicate that seven cultural resources lie within 0.25-mile of the project site. Of these resources, one resource includes scattered obsidian flakes that were found north of the northeast corner of the project area. A pedestrian survey of the project site conducted by Tom Origer & Associates on November 13, 2019, did not identify any archeological resources within the project site. Based on the results of the archival research and pedestrian survey, the likelihood that subsurface archaeological resources may be located within the project boundaries is low.<sup>32</sup> Additionally, implementation of General Plan Policies HP-A-1 through HP-A-3 would ensure known archaeological resources are protected and resources uncovered during construction would be evaluated and recorded. Furthermore, the proposed project would include housing on a project

<sup>32</sup> Tom Origer & Associates. 2019. Cultural Resources Study.

site designated for Medium High-Density Residential uses consistent with what was envisioned in the General Plan and evaluated in the General Plan FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to archaeological resources beyond what was previously analyzed in the General Plan FEIR.

**c) Unique Paleontological Resource or Geologic Feature**

Would the project: *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

The General Plan FEIR determined that implementation of the General Plan policies would reduce the contribution to cumulative to paleontological resources impacts to less than significant.

A Paleontological Records Search prepared for the proposed project by Consulting Paleontologist Kenneth L. Finger, PhD, determined that the project site contains Pleistocene alluvium soil formations that have a low potential for paleontological resources.<sup>33</sup> No paleontological resources have been recorded within 5 miles of the project location. Therefore, the likelihood of paleontological resources on the project site is low. As such, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to paleontological resources beyond what was previously analyzed in the General Plan FEIR.

**d) Human Remains Disturbance**

Would the project: *Disturb any human remains, including those interred outside of formal cemeteries?*

The General Plan FEIR determined that significant impacts to human remains could occur due to future buildout construction activity. However, the General Plan FEIR concluded that implementation of Policy HP-A-5 would ensure individual projects demonstrate general consistency with federal, State, and local regulations related to human remains.

The proposed project would implement General Plan Policy HP-A-5, which would ensure that in the event human remains are uncovered on the project site, work would be halted and the County Coroner would be contacted in compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to human remains beyond what was previously analyzed in the General Plan FEIR.

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<sup>33</sup> Kenneth L. Finger, PhD. Paleontological Records Search.

Environmental Issues	Prior General Plan FEIR Determination	CEQA Section 15183(b) Criteria			
		Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
K. Visual Quality <i>Would the project:</i>					
a) Have a substantial adverse effect on a scenic vista?	LTS	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state or locally designated scenic highway?	LTS	No	No	No	No
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	LTS	No	No	No	No
d) Create a new source of substantial light or glare which would substantially and adversely affect daytime or nighttime views in the area?	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

**a) Scenic Vista**

Would the project: *Have a substantial adverse effect on a scenic vista?*

The General Plan FEIR determined that the City would develop a variety of housing types, retail uses, and office uses that could affect views of scenic vistas including views to Sonoma Mountain foothills. The General Plan FEIR concluded that even with the development of new urban uses the General Plan FEIR impacts to scenic vista would be less than significant with the implementation of General Plan policies and adherence to Zoning Code height requirements for residential districts.

The project would include housing on a project site designated for Medium High-Density Residential uses consistent with what was envisioned in the General Plan and evaluated in the General Plan FEIR. In addition, the project proposes development on a project site zoned R-3-30 and would comply with the 45-foot maximum height requirement of this zoning designation. Existing trees and development located adjacent to the project site boundaries would continue to block views of recognized scenic vistas and the Sonoma Mountain foothills. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to scenic vistas beyond what was previously analyzed in the General Plan FEIR.

**b) Scenic Resource Damage**

Would the project: *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state or locally designated scenic highway?*

The General Plan FEIR determined future development impacts on scenic resources, such as scenic roads and City entry points, would be less than significant with the implementation of General Plan policies.

The project site is located approximately 0.11 miles to the west of Stony Point Road, a designated scenic city entry and corridor. However, views of Stony Point Road are completely obstructed because of trees and intervening development. This condition precludes the potential for new impacts associated with damage of scenic resources within a State or locally designated highway. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to scenic resources beyond what was previously analyzed in the General Plan FEIR.

**c) Visual Character Degradation**

Would the project: *Substantially degrade the existing visual character or quality of the site and its surroundings?*

The General Plan FEIR determined that development in the plan area would result in new buildings that could alter public views of surrounding hillsides and change visual character within the City. The General Plan FEIR concluded that compliance with zoning code requirements and General Plan policies along with undergoing the design review process would ensure new development minimally impacts visual character and impacts would be less than significant.

The proposed project would include housing on a project site designated for Medium High-Density Residential uses consistent with what was envisioned in the General Plan and evaluated in the General Plan FEIR, which is consistent with what was envisioned in the General Plan and evaluated in the General Plan FEIR. The project proposes development on a project site zoned R-3-30, would comply with the height requirements of this zoning designation, would undergo design review, and would comply with the General Plan policies. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to visual character beyond what was previously analyzed in the General Plan FEIR.

**d) Substantial Light or Glare Source**

Would the project: *Create a new source of substantial light or glare which would substantially and adversely affect daytime or nighttime views in the area?*

The General Plan FEIR concluded that compliance with General Plan policies, such as LUL-K-1, UD-D-1, UD-A-6, UD-B-6 would result in appropriate land usage and compliance with the City's Design Guidelines and Subdivision Guidelines, which would ensure that new development would result in



less than significant light and glare. The proposed project would result in new lighting and glare sources on an already developed site that contains existing light and glare sources. The immediate area surrounding the project site is highly urbanized with significant lighting sources from streetlights, single-family homes, and public facilities. The proposed project would adhere to the General Plan policies described above, including compliance with the City's Design Guidelines and Design Review. Thus, proposed project lighting would not introduce a new, substantial source of light and glare that would significantly affect daytime and nighttime views. Furthermore, the proposed project would include housing on a project site designated for Medium High-Density Residential uses consistent with what was envisioned in the General Plan and the General Plan FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to light and glare beyond what was previously analyzed in the General Plan FEIR.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>L. Agriculture and Forestry Resources</b> <i>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:</i>					
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?	LTS	No	No	No	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	LTS	No	No	No	No
c, d) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? Result in the loss of forest land or conversion of forest land to non-forest use?	LTS	No	No	No	No
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	LTS	No	No	No	No
No Impact; LTS=Less than significant; LTSM=Less than significant with mitigation; SU=Significant and unavoidable					

**a) Convert Farmland to Non-Agricultural Use**

Would the project: *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?*

The General Plan FEIR determined that only 67 acres of farmland within the City of Santa Rosa UGB are designated as Prime, Unique, or Farmland of State Importance and implementation of General Plan policies would result in less than significant impacts.

The Farmland Mapping and Monitoring Program (FMMP) lists the project site as Urban and Built-Up Land.<sup>34</sup> This condition precludes the potential for new impacts associated with the conversion of farmland to non-agricultural use. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to conversion of farmland to a non-agricultural use beyond what was previously analyzed in the General Plan FEIR.

**b) Conflict with Existing Agricultural Zoning or Williamson Act Contract**

Would the project: *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

The General Plan FEIR determined that urban development would be contained to the UGB, which contain few areas under Williamson Act contracts and concluded that impacts to open space and agriculture, which includes conflicts with existing zoning or Williamson Act contract would be less than significant.

The proposed project is zoned R-3-30, which is intended for multi-family housing not agricultural use. Furthermore, the site is currently developed with urban uses and is not encumbered by a Williamson Act contract. This condition precludes the potential for new impacts associated with conflicts with existing zoning or Williamson Act contract. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to conflicts with existing zoning or Williamson Act contract beyond what was previously analyzed in the General Plan FEIR.

**c, d) Rezoning or Conversion of Forest Land**

Would the project: *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? Result in the loss of forest land or conversion of forest land to non-forest use?*

The General Plan FEIR identifies priority forest land within Annadel State Park in the southeast portion of the City. The General Plan FEIR concluded that Annadel State Park is the only area within

<sup>34</sup> California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP). Sonoma County Important Farmland 2016.

the City designated as priority forest land<sup>35</sup> and implementation of General Plan policies would result in less than significant impacts to open space and agriculture, which includes rezoning or conversion of forest land.

The proposed project is zoned R-3-30, which is intended for multi-family housing and not forest land or timberland. The project site does not contain forest land or significant amounts of trees and is designated as Medium High-Density Residential by the General Plan, which is a non-forest land designation. These condition precludes the potential for new impacts associated with rezoning or conversion of forest land or timberland. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to rezoning or conversion of forest land beyond what was previously analyzed in the General Plan FEIR.

**e) Existing Zoning—Forest Land**

Would the project: *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

The General Plan FEIR determined that only 67 acres of farmland within the City of Santa Rosa UGB are designated as Prime, Unique, or Farmland of State Importance and the only designated forest land is within Annadel State Park outside the City's UGB. The General Plan FEIR concluded that implementation of General Plan policies would result in less than significant impacts.

The project site is designated as Urban and Built Up Land by the FMMP and does not contain forest land. The project site is designated as Medium High-Density Residential by the General Plan, which is a non-agricultural and non-forest land designation and is intended for urban development. This condition precludes the potential for new impacts associated with the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to conversion of agricultural or forest land to non-agricultural or non-forest land uses beyond what was previously analyzed in the General Plan FEIR.

<sup>35</sup> City of Santa Rosa. 2009. City of Santa Rosa General Plan 2035. November 3. Website: <https://srcity.org/392/General-Plan>. Accessed February 5, 2020.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>M. Geology, Soils, and Seismicity</b> <i>Project results in?</i>					
a) Exposure of 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.	LTS	No	No	No	No
ii) Strong Seismic Ground Shaking	LTS	No	No	No	No
iii) Seismic-related ground failure, including liquefaction.	LTS	No	No	No	No
iv) Inundation by seiche, tsunami, or mudflow.	LTS	No	No	No	No
v) Landslides	LTS	No	No	No	No
vi) Flooding, including flooding as a result of the failure of a levee or dam.	LTS	No	No	No	No
b) Substantial erosion or loss of topsoil.	LTS	No	No	No	No
c) Soil or a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landsliding, lateral spreading, subsidence, liquefaction, or collapse.	LTS	No	No	No	No
d) Location on expansive soil, creating substantial risks to life or property.	LTS	No	No	No	No
e) Soil incapable of supporting the use of septic tanks or other alternative wastewater disposal systems where sewers are not available.	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

The analysis in this section is based on the site-specific Geotechnical Engineering Investigation prepared by Krazan & Associates Inc. on April 16, 2019. All supporting material is included as Appendix F.

**a) Earthquake Hazards**

Project results in: *Exposure of 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; (ii) Strong Seismic Ground Shaking; (iii) Seismic related ground failure, including liquefaction; (iv) Inundation by seiche, tsunami, or mudflow; (v) Landslides; (vi) Flooding, including flooding as a result of the failure of a levee or dam?*

**Surface Fault Rupture**

The General Plan FEIR determined that surface fault rupture could occur within the Rodgers Creek Fault, which is a designated Alquist-Priolo Earthquake Fault Zone (APEFZ) that impacts commercial corridors along U.S. 101 and Downtown Santa Rosa. The General Plan FEIR concluded that implementation of General Plan policies and seismic structural design standards contained in the most recent California Building Standards Code (CBC) would ensure impacts to surface fault rupture would be less than significant.

The Rodgers Creek Fault Zone is located approximately 2.8 miles to the northeast of the project site.<sup>36</sup> As a result, the project site is not located within or near a recognized APEFZ. This condition precludes the potential for new impacts associated with surface fault rupture. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to surface fault rupture beyond what was previously analyzed in the General Plan FEIR.

**Seismic Ground Shaking**

The General Plan FEIR determined that strong ground shaking impacts could be higher in areas near Downtown Santa Rosa and areas located within or around the Rodgers Creek Fault Zone. The General Plan FEIR concluded that seismic shaking impacts could be reduced to a less than significant level with implementation of standard seismic structural design standards contained in the most recent CBC and implementation of General Plan policies.

The project-specific geotechnical investigation determined the proposed project could experience strong seismic ground shaking. However, the City, as part of its standard practice, would review the building plans for conformance with all recommendations included in the project-specific geotechnical investigation. In addition, consistent with the General Plan FEIR, the proposed project would adhere to seismic design standards and General Plan policies. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to seismic ground shaking beyond what was previously analyzed in the General Plan FEIR.

**Seismically-Related Ground Failure**

The General Plan FEIR determined that area near Downtown Santa Rosa and lowland areas of Rincon Valley could be susceptible to liquefaction but impacts could be reduced to a less than significant

<sup>36</sup> Krazan and Associates. Geotechnical Engineering Investigation, page 6. 2019.

level with implementation of standard seismic structural design standards contained in the most recent CBC and General Plan policies.

The project-specific geotechnical investigation determined liquefaction could occur on-site. However, the City, as part of its standard practice, would review the building plans for conformance with all recommendations included in the project-specific geotechnical investigation. In addition, consistent with the General Plan FEIR, the proposed project would adhere to seismic design standards and General Plan policies. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to seismically-related ground failure beyond what was previously analyzed in the General Plan FEIR.

### **Landslides (Including Seismically-Induced)**

The General Plan FEIR determined that earthquake induced landslides could occur in areas where landslides previously occurred and on slopes greater than 15 percent but impacts could be reduced to a less than significant level with implementation of standard seismic structural design standards contained in the most recent CBC and General Plan policies.

The project site has a low potential for landslides to occur because the site is relatively flat with no slopes over 15 percent and is located within a highly urbanized area with no exposed, steep slopes susceptible to landslides. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to seismically-induced landslides beyond what was previously analyzed in the General Plan FEIR.

### **Flooding (including as a result of the failure of a levee or dam)**

The General Plan FEIR determined that there are several reservoirs with dam failure inundation zones located within the Santa Rosa planning area but that related impacts would be less than significant with implementation of General Plan policies.

As discussed in Impact H(i), the project site is not located within a dam failure inundation zone and the closest dam failure inundation zone is located approximately 1.5 miles to the west of the project site.<sup>37</sup> This condition precludes the potential for new impacts associated with dam failure inundation. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to flooding due to dam failure beyond what was previously analyzed in the General Plan FEIR.

### **(b) Topsoil Loss**

Project results in: *Substantial erosion or loss of topsoil?*

The General Plan FEIR determined that erosion of topsoil could occur in sloped upland areas, during construction activity, and in areas with exposed, non-vegetated slopes. However, the General Plan

<sup>37</sup> Sonoma County. Sonoma County Hazard Mitigation Plan, Figure 8.7. 2011.



FEIR determined that implementation of General Plan policies would prevent substantial erosion or loss of topsoil and impacts would be less than significant.

The proposed project would be required to implement requirements contained in Santa Rosa Municipal Code Chapter 19-64 Grading and Erosion Control, which would prevent substantial erosion or loss of topsoil. In addition, in compliance with General Plan policies, the proposed project would implement construction and operational standards contained in the SUSMP and SWPPP that would further prevent substantial erosion or loss of topsoil. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to erosion of topsoil beyond what was previously analyzed in the General Plan FEIR.

**(c) Unstable Soil or Geologic Unit**

Project results in: *Soil or a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landsliding, lateral spreading, subsidence, liquefaction, or collapse?*

The General Plan FEIR determined that unstable geologic units could occur throughout the City including subsidence, landslides, and liquefaction. However, the General Plan FEIR determined that implementation of General Plan policies would prevent effects related to unstable soils or geologic units and impacts would be less than significant.

The project site contains gravelly sand and clayey soils that could experience subsidence or collapse at operation.<sup>38</sup> However, the City, as part of its standard practice, would review the building plans for conformance with all recommendations included in the project-specific geotechnical investigation. In addition, consistent with the General Plan FEIR, the proposed project would adhere to General Plan policies which would reduce impacts to unstable soils or geologic units. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to unstable soils or geologic units beyond what was previously analyzed in the General Plan FEIR.

**(d) Expansive Soil**

Project results in: *Location on expansive soil, creating substantial risks to life or property?*

The General Plan FEIR determined that expansive soils could occur in low-lying alluvial valley areas of the City, but implementation of General Plan policies would prevent effects related to expansive soils and impacts would be less than significant.

The project site contains clayey soils with a moderate shrink and swell potential.<sup>39</sup> As such, the project site contains expansive soils. However, the City, as part of its standard practice, would review the building plans for conformance with all recommendations included in the project-specific geotechnical investigation. These recommendations would include replacing expansive soils with engineered soils designed to support project structures. In addition, consistent with the General Plan FEIR, the proposed project would adhere to General Plan policies. Therefore, the proposed project

<sup>38</sup> Krazan & Associates. Geotechnical Engineering Investigation, page 7. 2019.

<sup>39</sup> Krazan & Associates. Geotechnical Engineering Investigation, page 10. 2019.

would not result in any peculiar effects and would not result in new or more severe impacts related to expansive soils beyond what was previously analyzed in the General Plan FEIR.

**(e) Septic Tanks**

Project results in: *Soil incapable of supporting the use of septic tanks or other alternative wastewater disposal systems where sewers are not available?*

The General Plan FEIR determined that the City would contain sufficient wastewater treatment capacity to serve future buildout and implementation of General Plan policies would ensure impacts to wastewater capacity would be less than significant.

The proposed project would connect to existing wastewater lines contained within West College Avenue and, therefore, would not include the use of alternative wastewater disposal systems. This condition precludes the potential for new impacts associated with the use of septic tanks. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to soils capable of supporting septic tanks beyond what was previously analyzed in the General Plan FEIR.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>N. Hazards and Hazardous Materials</b> <i>Would the project:</i>					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	LTS	No	No	No	No
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.	LTS	No	No	No	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	LTS	No	No	No	No
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 create a significant hazard to the public or the environment.	LTS	No	No	No	No
e, f) 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. 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.	LTS	No	No	No	No
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LTS	No	No	No	No

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
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.	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

The analysis in this section is based on the site specific Phase I Environmental Site Assessment (Phase I ESA) prepared by Krazan & Associates, Inc. on March 19, 2019, and the site specific Supplemental Phase II Limited Subsurface Assessment (Phase II LSA) prepared by Krazan & Associates, Inc. on July 31, 2019, which are both provided in Appendix G.

**a) Hazardous Material Transport, Use or Disposal**

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

The General Plan FEIR determined that future development would include commercial, light industrial, and general industrial uses that would involve the transport, handling, and storing of hazardous materials. However, the General Plan identifies policies designed to reduce the impact of businesses routinely using, storing, and transporting hazardous materials. Compliance with these policies, in combination with applicable federal, State, and local laws, would reduce the impact of the routine use, transport, or disposal of hazardous material to a less than significant level.

The proposed project's residential uses would represent a use anticipated in the General Plan and would not transport, use, or dispose of significant hazardous materials in amounts greater than what was analyzed in the General Plan FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to the transport, use, and storage of hazardous materials beyond what was previously analyzed in the General Plan FEIR.

**b) Hazardous Material Upset or Accident**

Would the project: *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

The General Plan FEIR determined that future development would include commercial, light industrial, and general industrial uses that could potentially expose workers or residents to hazardous materials due to an accidental release. However, the General Plan identifies policies

designed to reduce the potential for accidental hazardous materials release. Compliance with these policies, in combination with federal, State, and local laws, would reduce the impact of the accidental release of hazardous material to a less than significant level.

The project site is listed on the GeoTracker website for a Leaking Underground Storage Tank (LUST) cleanup site and the case was closed July 16, 2007.<sup>40</sup> The Phase I ESA prepared for the project site determined that there is evidence of Recognized Environmental Conditions (RECs), Historical RECs (HRECs), Potential Areas of Concern (PAOCs), regulatory compliance issues, and ASTM non-scope issues (i.e. asbestos containing materials and potential lead based paint). Please refer to Appendix G for a full list of potential contaminants. Subsequently a Phase II LSA was conducted by Krazan & Associates, Inc. on July 31, 2019. The Phase II LSA evaluated soil samples for total petroleum hydrocarbons carbon chain (TPH-cc), volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), and CAM 17 metals. Groundwater samples were analyzed for nitrate/nitrite, pH and CAM 17 metals, and for TPH-cc, VOCs, PCBs, and CAM 17 metals. Soil vapor samples were analyzed for VOCs. In addition, a limited subsurface survey was conducted in the northwestern portion of the subject site formerly occupied by the rural residential farm area to assess whether there is evidence of an underground storage tank (UST).

Based upon the findings of the Phase II LSA, no concentrations of contaminants of concern (COCs) reported in the soil represent a significant environmental issue and the elevated concentrations of metals in groundwater are naturally occurring and no further assessment is warranted. The Phase II LSA recommends that the groundwater beneath the subject site not be extracted and used for any purpose on the subject site, and that a groundwater management plan be prepared to ensure construction worker safety in the event that groundwater is encountered during construction/or grading activities. The Phase II LSA also recommends that a construction workers Health and Safety Plan be prepared and implemented in the event that construction workers are required to handle groundwater. These recommendations would be implemented during proposed project construction and operation consistent with General Plan Policy NS-F-1, which requires remediation and cleanup, and evaluation of risk prior to reuse, in identified areas where hazardous materials and petroleum products have impacted soil or groundwater. Also pursuant to General Plan Policy NS-F-1, the proposed project would conduct a lead-based paint and asbestos containing material (ACM) survey prior to demolition and would be required to remove all contaminated material and ACMs in compliance with federal and State law. Compliance with General Plan policies and recommendations contained in the Phase II LSA would ensure the proposed project would not result in impacts greater than analyzed in the General Plan FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to the accidental release of hazardous materials beyond what was previously analyzed in the General Plan FEIR.

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<sup>40</sup> California State Water Resources Control Board (State Water Board). GeoTracker. Website: [https://geotracker.waterboards.ca.gov/profile\\_report?global\\_id=T0609700713](https://geotracker.waterboards.ca.gov/profile_report?global_id=T0609700713). Accessed December 26, 2019.

**c) Hazardous Materials Emissions Near Schools**

Would the project: *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

The General Plan FEIR determined that compliance with federal, State, and General Plan policies would minimize potential adverse effects from handling hazardous materials and impacts would be less than significant.

The project site is not located within 0.25-mile of a school; the closest school is the Albert F. Biella Elementary School located 0.7-mile to the north. This condition precludes the potential for new impacts associated with hazardous materials emissions near schools. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to the hazardous materials emissions near schools beyond what was previously analyzed in the General Plan FEIR.

**d) Government Code Section 65962.5**

Would the project: *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?*

The General Plan FEIR determined that redevelopment of vacant or previously developed lots could expose hazardous materials to neighboring properties and residents resulting from LUSTs. However, the General Plan FEIR concluded that remediation efforts would be conducted by regulatory agencies, such as the Regional Water Quality Control Board and the Department of Toxic Substances Control, and implementation of General Plan policies would reduce potential impacts to a less than significant level.

The project site is listed on the GeoTracker website for a LUST cleanup site and the case was closed July 16, 2007.<sup>41</sup> As described previously, no concentrations of COCs reported in the soil represent a significant environmental issue and the elevated concentrations of metals in groundwater are naturally occurring. Compliance with General Plan policies and recommendations contained in the Phase I ESA and Phase II LSA, as described above in Impact N(b) would ensure the proposed project would not result in impacts greater than analyzed in the General Plan FEIR. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to hazardous materials sites beyond what was previously analyzed in the General Plan FEIR.

<sup>41</sup> California State Water Resources Control Board (State Water Board). GeoTracker. Website: [https://geotracker.waterboards.ca.gov/profile\\_report?global\\_id=T0609700713](https://geotracker.waterboards.ca.gov/profile_report?global_id=T0609700713). Accessed December 26, 2019.

**e) Airport or Private Airstrip Hazard**

Would the project: *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? 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?*

The General Plan FEIR notes that the ALUC adopted the Comprehensive Airport Land Use Plan Update for Sonoma County in 2001, a Comprehensive Airport Land Use Plan, that covers the six public use airports in Sonoma County, including the Charles M. Schulz—Sonoma County Airport. Section A, Land Use Consistency and Compatibility, of the General Plan FEIR determined that, with implementation of General Plan policies, the General Plan would not conflict with existing plans, which includes the Comprehensive Airport Land Use Plan Update for Sonoma County.

The project site is located approximately 4.6 miles south of the Charles M. Shultz Airport and does not fall within the sphere of influence of the Sonoma County Airport or any other airport,<sup>42</sup> and there are no private airstrips within 2 miles of the project site. The distance of the project site from local airports and private airstrips, intervening development, and applicable air traffic and safety regulations precludes the potential for impacts associated with development within the vicinity of airports and private airstrips. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to public airports or private airstrips beyond what was previously analyzed in the General Plan FEIR.

**g) Emergency Response Plan**

Would the project: *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The General Plan FEIR determined that future development would impact emergency response plans due to increase traffic congestion. However, the General Plan identifies policies designed to reduce impacts to emergency response plans and evacuation plans and the General Plan FEIR concluded that implementation of these policies would result in less than significant impacts.

The Local Hazard Mitigation Plan (LHMP) designates emergency evacuation routes, including U.S. 101, Highway 12 and Fountaingrove Parkway-Mission Boulevard. The project site is located adjacent to West College Avenue and, as a result, would not interfere with evacuation along these routes. Additionally, the project does not propose permanent road closures or lane narrowing that would impact an emergency response plan or evacuation plan. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to emergency response plans beyond what was previously analyzed in the General Plan FEIR.

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<sup>42</sup> Sonoma County Airport Land Use Commission (ALUC). 2016. Sonoma County Airport Safety Zones, Exhibit C4.



## h) Wildland Fire

Would the project: *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?*

The General Plan FEIR determined that residential development would increase risk of wildland fire. However, the General Plan concluded that implementation of the following General Plan policies would ensure that wildland fire risk would be reduced to a less than significant level.

- **NS-G-1:** Require proposed developments in high or medium fire hazard areas to investigate a site's vulnerability to fire and to minimize risk accordingly.
- **NS-G-2:** Require new development in areas of high wildfire hazard to utilize fire-resistant building materials. Require the use of on-site fire suppression systems, including automatic sprinklers, smoke and/or detection systems, buffers and fuel breaks, and fire retardant landscaping.
- **NS-G-3:** Prohibit untreated wood shake roofs in areas of high fire hazard.
- **NS-G-4:** Continue monitoring water fire-flow capabilities throughout the city and improving water availability at any locations having flows considered inadequate for fire protection.
- **NS-G-5:** Require detailed fire prevention and control measures, including community firebreaks, for development projects in high fire hazard zones.
- **NS-G-6:** Minimize single-access residential neighborhoods in development areas near open space, and provide adequate access for fire and other emergency response personnel.

The proposed project is not within a Fire Hazard Zone as defined in Figure 12-5 of the General Plan. However, this area of Santa Rosa has been susceptible to wildfires in recent years, and the project site was under an evacuation order during the wildfires in November 2019. The proposed project would comply with General Plan Policies NS-G-2, NS-G-5, and NS-G-6. In addition, the proposed project would include two driveways that would connect to West College Avenue, which would provide adequate emergency vehicle access in the event of fire.

Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to wildland fire beyond what was previously analyzed in the General Plan FEIR.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>O. Energy</b> <i>Would the project:</i>					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	LTS	No	No	No	No
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

The analysis in this section is based on supporting information contained in Appendix H.

#### a) Energy Use

Would the project: *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

The General Plan FEIR determined that implementation of the City Code, Green Building Requirements of Resolution 27001, as well as several objectives and policies in the General Plan would support energy efficiency in new and retrofitted construction. As a result, the General Plan FEIR concluded that impacts related to energy use would be less than significant.

The General Plan FEIR did not evaluate impacts at the project level. Therefore, the following analysis provides an evaluation of potential project-level impacts with respect to energy use.

#### Construction

During construction, the proposed project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for temporary buildings, lighting, and other sources. No natural gas would be utilized as part of construction. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during site demolition, site preparation, grading, paving, and building construction. The types of equipment could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, frontend loaders, forklifts, and cranes. Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools.

Based on CalEEMod estimations (Appendix B), construction-related vehicle trips and construction equipment usage would result in the consumption of an estimated 88,836 gallons of gasoline and diesel combined during the construction phase (Appendix H). The complete calculations of the construction energy consumptions estimates are included in Appendix H.

Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations Title 13 Sections 2449(d)(3) and 2485, limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. In addition, given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. Single-wide mobile office trailers, which are commonly used in construction staging areas, generally range in size from 160 square feet to 720 square feet. A typical 720-square-foot office trailer would consume approximately 18,500-kilowatt hour (kWh) during the 17-month construction phase (Appendix H). The City of Santa Rosa has established standard conditions of project approval that limit hours of construction to between the hours of 7:00 a.m. and 7:00 p.m. on weekdays, and between 8:00 a.m. and 6:00 p.m. on Saturdays; no construction is permitted on Sundays and holidays. As on-site construction activities would be restricted to these hours, it is anticipated that the use of construction lighting would be minimal after construction activities end each day. Potential after-hours lighting and energy use would involve lighting for safety measures around the site. Due to the temporary nature of construction and the financial incentives for developers and contractors to use energy-consuming resources in an efficient manner, the construction phase of the proposed plan would not result in wasteful, inefficient, and unnecessary consumption of energy.

## **Operation**

### *Electricity and Natural Gas*

Building operations for the proposed project would involve energy consumption for multiple purposes including, but not limited to, building heating and cooling, refrigeration, lighting, and electronics as well as outdoor lighting. The proposed project is designed as an all-electric development and would not include on-site natural gas use during project operations. Based on CalEEMod estimations within the modeling output files used to estimate GHG emissions associated with the project, operations would consume approximately 709,776 kWh of electricity per year (Appendix H). However, the project would achieve net zero electricity through a combination of on-site solar and the purchase of renewable electricity. Specifically, City of Santa Rosa CAP Action 1.1.3 requires new developments after 2020 to utilize net zero electricity.<sup>43</sup> The proposed project would be designed and constructed in accordance with the City of Santa Rosa's CAP, City of Santa Rosa's CALGreen Requirements, CALGreen 2020 Tier 1 Standards, and the State's Title 24 energy efficiency standards. CALGreen Requirements (which are based which are based on the State's Title 24 energy efficiency standards) include building, electricity, and water conservation energy saving measures

<sup>43</sup> City of Santa Rosa. 2012. City of Santa Rosa Climate Action Plan. Website: <https://srcity.org/DocumentCenter/View/10762>. Accessed December 5, 2019.

that are required to be completed as part of the building permitting process.<sup>44</sup> Title 24 standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. Compliance with Title 24 standards would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. Energy and water efficient design measures for the proposed project will include the incorporation of solar power design, the installation of several electric charging stations, water efficient landscaping, and high efficiency lighting and appliances. These standards are widely regarded as the most advanced energy efficiency standards and compliance would ensure that operational energy consumption would not result in the use of energy in a wasteful manner or inefficient manner.

#### *Fuel*

Operational energy would also be consumed during vehicle trips. Fuel consumption would be primarily related to vehicle use by residents, visitors, and employees. Based on the estimates contained in the CalEEMod output files (Appendix B), vehicle trips associated with the proposed project would result in 1.4 million VMT, and consume an estimated 56,715 gallons of gasoline and diesel combined on an annual basis.<sup>45</sup> The project site is located approximately 1.9 miles west of U.S. 101 and approximately 1.5 miles north of Highway 12. As such, it would be in proximity to a regional route of travel. The project site is also located 25 feet from the West College Avenue and Navarro Drive Bus stop that provides service to Santa Rosa CityBus Route 6, and 330 feet from the West Side Transfer Center that provides service to Santa Rosa CityBus Routes 3, 6 and 15. Bus stops serving these routes are located along West College Avenue. The existing transportation facilities in the area would provide future residents and visitors with access to public transportation, thus further reducing fuel consumption demand. Additionally, the site would be developed to facilitate pedestrian connectivity to adjacent land uses and would provide bike parking spaces. For these reasons, transportation fuel consumption would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during long-term operations.

The proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to energy use beyond what was previously analyzed in the General Plan FEIR.

#### **b) Energy Efficiency and Renewable Energy Standards Consistency**

Would the project: *Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?*

The General Plan FEIR determined that development under the General Plan would potentially increase reliance on fossil fuels or decreased use of renewable resources. The General Plan FEIR concluded that impacts would be less than significant with implementation of General Plan Policies OSC-K, OSC-K-1, OSC-K-2, OSC-K-3, OSC-L, OSC-L-1, and OSC-L-2 which would increase the use

<sup>44</sup> City of Santa Rosa. 2017. City of Santa Rosa Residential 2016 CALGreen+Tier 1 Checklist. February. Website: <https://srcity.org/DocumentCenter/View/15211/2016-CALGreen-Checklist-New-Residential>. Accessed December 5, 2019.

<sup>45</sup> Based on the 2,110,796 annual VMT consistent with CalEEMod output (Appendix B) and an average fuel consumption determined using EMFAC2014 factors for Sonoma County in the 2022 calendar. Website: <https://www.arb.ca.gov/emfac/2014/>. Accessed December 4, 2019.

renewable resources, such as solar panels, and reduce energy consumption of fossil fuels through energy efficient building design. The following evaluates whether the proposed project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

### **Construction**

The proposed project would result in energy consumption through the combustion of fossil fuels. Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations Title 13 Sections 2449(d)(3) and 2485 limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. The proposed project would be required to comply with these regulations. There are no renewable energy standards that would apply to construction of the proposed project. As a result, construction would not conflict with or obstruct any regulations adopted for the purposes of increasing the use of renewable energy. Furthermore, it is anticipated that construction of the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to construction energy efficiency and use of fossil fuels or decreased use of renewable resources beyond what was previously analyzed in the General Plan FEIR.

### **Operation**

To comply with Santa Rosa's CAP Action 1.1.3, which requires new developments after 2020 to utilize net zero electricity, residents will be required to purchase electricity from Sonoma Clean Power EverGreen.<sup>46</sup> Additionally, the proposed project would include on-site solar generation. As such, the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. This condition precludes the potential for new impacts associated with conflicts a State or local plan for renewable energy or energy efficiency. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to operational energy efficiency and use of fossil fuels or decreased use of renewable resources beyond what was previously analyzed in the General Plan FEIR.

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<sup>46</sup> City of Santa Rosa. 2012. City of Santa Rosa Climate Action Plan. Website: <https://srcity.org/DocumentCenter/View/10762>. Accessed December 5, 2019.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>P. Parks and Recreation</b> <i>Would the project:</i>					
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?	LTS	No	No	No	No
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?	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

**a) Effects of Increased Use of Existing Parks**

Would the project: *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?*

The General Plan FEIR determined that buildout of undeveloped and proposed park facilities would result in a total of 864.15 acres of parks with a 2035 population of 233,520. As a result, the planned park facilities under the General Plan would result in 3.7 acres of parks per 1,000 residents, which would exceed the 3.5 acres per 1,000 resident's standard. The General Plan FEIR concluded impacts would be less than significant related to park facilities with implementation of General Plan policies.

Although the proposed project's new residents would increase demand for park facilities compared to existing conditions, that demand was analyzed in the General Plan FEIR and impacts were found to be less than significant. Furthermore, the project applicant would be required to pay park impact fees consistent with Chapter 19-70 Park and Recreation Land and Fees of the Santa Rosa Municipal Code. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to the deterioration of park facilities beyond what was previously analyzed in the General Plan FEIR.

**b) Effects from Provision of Parks or Recreational Facilities**

Would the project: *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?*

The General Plan FEIR determined that implementation of General Plan policies would ensure sufficient recreational facilities are provided to meet City standards and impacts would be less than significant.

Although the proposed project's new residents would increase demand for recreational facilities compared to existing conditions, that demand was analyzed in the General Plan FEIR and impacts were found to be less than significant. In addition, the proposed project would include an extension of the pedestrian trail along College Creek, which would link an existing trail to West College Avenue and provide easier access to the pedestrian trail along College Creek and provide additional recreational facilities for the public. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to park facilities beyond what was previously analyzed in the General Plan FEIR.



Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>Q. Greenhouse Gas Emissions (formerly known as Climate Change)</b> <i>Would the project:</i>					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	SU	No	No	No	No
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	SU	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

A detailed description of the assumptions used to estimate emissions and the complete CalEEMod output files are contained in Appendix B.

#### a) Greenhouse Gas Emissions

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

The General Plan FEIR determined that buildout of the General Plan would exceed applicable threshold of significance and thereby have a negative effect on global climate change and concluded that impacts would be significant and unavoidable. Although General Plan policies would reduce the impacts to the maximum extent feasible, the General Plan FEIR determined that no feasible mitigation is available to reduce greenhouse gas (GHG) emissions-related impacts to a less-than-significant level.

Both construction and operational activities have the potential to generate GHG emissions. The proposed project would generate GHG emissions during temporary (short-term) construction activities such as demolition, site preparation and grading, running of construction equipment engines, movement of on-site heavy-duty construction vehicles, hauling of materials to and from the project site, asphalt paving, and construction worker motor vehicle trips.

Long-term, operational GHG emissions would result from project-generated vehicular traffic, on-site combustion of natural gas for space and water heating, operation of any landscaping equipment, off-site generation of electrical power over the life of the proposed project, the energy required to convey water to and wastewater from the project site, and the emissions associated with the hauling and disposal of solid waste from the project site.

The 2017 BAAQMD Thresholds contain the following thresholds for GHGs:

For land use development projects (including residential, commercial, industrial, and public land uses and facilities), (1) the threshold is compliance with a Qualified GHG Reduction Strategy; or (2) annual emissions less than 1,100 metric tons (MT) per year of carbon dioxide equivalent (CO<sub>2</sub>e); or (3) 4.6 MT CO<sub>2</sub>e/service population/year (residents + employees).

It should be noted that the BAAQMD's thresholds of significance were established based on meeting the 2020 GHG targets set forth in the Assembly Bill (AB) 32 Scoping Plan. The BAAQMD has not yet updated their recommended GHG emissions thresholds to address target reductions past year 2020. However, consistent with current State directives (SB 32 and AB 398), the updated target requires an additional 40 percent reduction in GHG emissions by year 2030. Applied to the BAAQMD quantitative thresholds based on 2020 AB 32 GHG reduction goals, this would equate to 660 MT CO<sub>2</sub>e per year by year 2030 or 2.6 MT CO<sub>2</sub>e per year per service population by year 2030.<sup>47</sup>

Qualified GHG Reduction Strategies remain an appropriate threshold if the project's full buildout year falls within the time horizon covered within a Qualified GHG Reduction Strategy and if the Qualified GHG Reduction Strategy demonstrates compliance with post-2020 GHG reduction goals. The City of Santa Rosa calculated GHG emissions reductions with implementation of the City's CAP not just for comparison to the 2020 targets, but also out to year 2035 to be consistent with the planning horizon of the General Plan. As summarized on page ES-7 of the City's CAP, implementation of the measures of the City's CAP are expected to decrease GHG emissions to 2.3 MT CO<sub>2</sub>e per person per year by year 2035.<sup>48</sup> While this timeframe is 5 years after the assumed 2030 target threshold, the City's CAP notes that with a reduction to 2.9 MT CO<sub>2</sub>e per person per year in 2020 with assumed steady reductions over time, it can be concluded that emissions would be below 2.6 MT CO<sub>2</sub>e per person per year (or a 40 percent reduction below 2020 thresholds) by year 2030.

### Short-term Construction Impacts

The proposed project would emit GHG emissions during construction from the off-road equipment, worker vehicles, and any hauling that may occur. The BAAQMD does not presently provide a construction-related GHG emission threshold, but recommends that construction-generated GHG emissions be quantified and disclosed. Total GHG emissions generated throughout construction were combined and are presented in Table 15. As shown in Table 15, construction of the proposed project is estimated to generate approximately 897 MT CO<sub>2</sub>e over the entire project construction duration. Because construction would be temporary and would not result in a permanent increase in GHG emissions, the proposed project would not interfere with the implementation of AB 32 or SB 32.

<sup>47</sup> Association of Environmental Professionals (AEP). 2016. Final White Paper Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California. Website: [https://califaep.org/docs/AEP-2016\\_Final\\_White\\_Paper.pdf](https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf). Accessed February 7, 2020.

<sup>48</sup> City of Santa Rosa Community Development. 2012. Climate Action Plan: City of Santa Rosa. Website: <https://srcity.org/DocumentCenter/View/10762/Climate-Action-Plan-PDF?bidId=>. Accessed May 26, 2020. June 5.

Table 15: Construction GHG Emissions

Construction Phase	MT CO <sub>2</sub> e per year
Demolition—2021	83
Site Preparation—2021	26
Grading—2021	109
Trail Improvements—2021	5
Building Construction—2021	5
Grading—2022	55
Paving—2022	23
Building Construction—2022	586
Architectural Coating—2022	5
<b>Total Construction Emissions</b>	<b>897</b>
<b>Emissions Amortized Over 30 Years<sup>1</sup></b>	<b>30</b>

Notes:  
MT CO<sub>2</sub>e = metric tons of carbon dioxide equivalent  
<sup>1</sup> Construction GHG emissions are amortized over the 30-year lifetime of the project.  
Source: CalEEMod Output (Appendix B).

## Project Operation

Operational or long-term emissions occur over the life of a project. The major sources for operational GHG emissions include motor vehicles, natural gas, indirect electricity, water transport, and waste.

The City's CAP follows both the State CEQA Guidelines and BAAQMD's Guidelines by incorporating the standard elements of a Qualified GHG Reduction Strategy. Standard elements of a Qualified GHG Reduction Strategy include measures or a group of measures (including performance standards) that demonstrate with substantial evidence that, if implemented on a project-by-project basis, would collectively achieve specified emissions levels.

Establishing consistency with a Qualified GHG Reduction Strategy (per CEQA Guidelines § 15183.5) is an appropriate approach to determine significance for individual projects and is one of the three recommended BAAQMD thresholds previously discussed. This approach allows lead agencies to analyze and mitigate the significant effects of GHG emissions at a programmatic level to reduce GHG emissions, so that later individual development projects may tier from the prior analysis to determine significance. Appendix D of the City's CAP describes in detail how the City's CAP was developed to satisfy the requirements of the BAAQMD's guidelines on the standard elements of a Qualified GHG Reduction Strategy, with the intent to allow future development projects to determine that a project has a less than significant impact on GHG emissions as long as it is in compliance with the City's CAP. These standard elements of a Qualified GHG Reduction Strategy and the of incorporation of each element into the City's CAP, are provided in Table 16.

**Table 16: City of Santa Rosa Climate Action Plan Consistency with Elements of a Qualified Greenhouse Gas Reduction Strategy**

Standard Elements of a Qualified GHG Reduction Strategy	The City of Santa Rosa Climate Action Plan's Incorporation of Elements of a Qualified GHG Reduction Strategy
Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic range.	<b>Incorporated.</b> The City's CAP consists of a city-wide GHG emissions inventory, which separates activities that generate GHG emissions into sectors including vehicle transportation, building energy usage, water delivery systems and others. The City's CAP includes existing and projected GHG emissions for the defined geographic range of the City of Santa Rosa. "Business-as-usual GHG forecast" (status quo before state, regional, and local reduction efforts are taken into consideration) GHG emissions are included in the CAP for years 2007, 2015, 2020, and 2035.
Establish a level, based on substantial evidence below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.	<b>Incorporated.</b> The City, in coordination with the Climate Protection Campaign, Sonoma County, and the other nine municipalities in Sonoma County, established one of the most aggressive GHG reduction targets in the state and nation by committing to reduce GHG emissions 25 percent below 1990 levels by 2015. The City's CAP demonstrates that the City would meet this reduction goal by 2020 with implementation of measures in the City's CAP. Furthermore, this goal exceeds the requirements of the AB 32 2020 reduction targets. With implementation of the reduction measures, a total of 558,090 MT CO <sub>2</sub> e is expected to be reduced in the City of Santa Rosa by 2020. The City's CAP includes calculated GHG emission reductions with implementation of the City's CAP not just for comparison to the 2020 targets but also out to year 2035, to be consistent with the planning horizon of the General Plan. As summarized on page ES-7 of the City's CAP, implementation of the measures of the City's CAP are expected to decrease GHG emissions to 2.3 MT CO <sub>2</sub> e per person per year by year 2035.
Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area.	<b>Incorporated.</b> As previously mentioned, the City's CAP demonstrates that the City would reduce GHG emissions 25 percent below 1990 levels by year 2020. The City's CAP includes calculated GHG emission reductions with implementation of the City's CAP not just for comparison to the 2020 targets but also out to year 2035, to be consistent with the planning horizon of the General Plan. As summarized on page ES-7 of the City's CAP, implementation of the measures of the City's CAP are expected to decrease GHG emissions to 2.3 MT CO <sub>2</sub> e per person per year by year 2035. In addition, the City's CAP states that its reduction measures build on previous efforts (particularly the Climate Protection Campaign's Community CAP). In addition, the measures offer a diverse mix of regulatory and incentive-based programs

Standard Elements of a Qualified GHG Reduction Strategy	The City of Santa Rosa Climate Action Plan's Incorporation of Elements of a Qualified GHG Reduction Strategy
	for both new and existing developments.
Specify measures or a group of measures, including performance standards that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.	<b>Incorporated.</b> As explained on page ES-9 of the City's CAP, the City's CAP includes an implementation chapter and implementation matrix with details specific to each measure. Details described in the matrix include the following for individual measures: the responsible department, the implementation timeframe, and co-benefits. The City's CAP intended for this implementation matrix to be used to monitor the City's progress toward implementing the goals and policies included in the City's CAP. At the project level, the City's CAP includes a New Development Checklist for individual development projects to fill out to demonstrate compliance with the City's CAP.
Monitor the plan's progress.	<p><b>Incorporated.</b> As previously explained, the City's CAP includes an implementation matrix that will be used to monitor the City's progress toward implementing the goals and policies included in the City's CAP. The plans for implementation and monitoring are further explained on page D-9 of the City's CAP. The City's CAP indicates that it plans for staff to coordinate City Green Team meetings, track implementation of GHG reduction strategies and progress toward GHG reduction targets, and prepare annual reports to the City Council on the City CAP's implementation and progress.</p> <p>The City has actively implemented and continues to actively implement GHG reduction measures from the community-wide CAP (i.e the City's CAP) applicable to this project and the Municipal Operations Climate Action Plan (Municipal CAP), with goals and policies related to GHG emissions produced by municipal activities and developments, to reduce local GHG emissions to meet state, regional, and local reduction targets. These actions are documented in "Climate Action Planning in Santa Rosa" on the City's website."<sup>49</sup></p> <p>In February 2019, the Santa Rosa City Council designated implementation of the City's CAP as a Tier One Council priority. A Climate Action Subcommittee was formed in 2019 to provide guidance and oversight of the implementation of the Municipal CAP and the City's CAP with a goal of reducing the local GHG emissions and ensuring long-term sustainability and resilience from climate change and its effects.</p>
Adopt the GHG reduction strategy in a public	<b>Incorporated.</b> The City's CAP was adopted on June 5,

<sup>49</sup> City of Santa Rosa. no date. Climate Action Planning in Santa Rosa. Website: <https://srcity.org/1634/Climate-Action-Planning>. Accessed June 22, 2020.

Standard Elements of a Qualified GHG Reduction Strategy	The City of Santa Rosa Climate Action Plan's Incorporation of Elements of a Qualified GHG Reduction Strategy
process following environmental review.	2012 and was adopted as a GHG reduction strategy in a public process following environmental review.
Source of City's CAP: City of Santa Rosa. 2012. City of Santa Rosa Climate Action Plan. Website: <a href="https://srcity.org/DocumentCenter/View/10762">https://srcity.org/DocumentCenter/View/10762</a> . Accessed May 26, 2020. June 5.	

As detailed in Table 16, the City's CAP remains a Qualified GHG Reduction Strategy and demonstrates that it would meet the anticipated State 2030 GHG emissions reductions targets. If the proposed project can demonstrate consistency with the City's CAP, its impacts related to GHG emission by year 2030 would be considered fully consistent with State GHG emissions reduction requirements, with *no need to quantify project-specific emission*. This is consistent with BAAQMD guidelines related to the analysis of projects and accounts for the anticipated updates to BAAQMD's 2030 GHG targets.

### Santa Rosa Climate Action Plan New Development Checklist

To ensure new development projects comply with the City's CAP, the City developed the New Development Checklist as part of the Santa Rosa CAP (provided as Appendix E of the City's CAP). Project compliance with the Santa Rosa CAP New Development Checklist is shown in Table 17. Measures denoted with an asterisk are required in all new development projects. As shown in the table, the proposed project would comply with applicable requirements.

**Table 17: Consistency with Santa Rosa's Climate Action Plan New Development Checklist**

New Development Checklist Measures	Project Consistency
<b>Required Measures</b>	
<b>1.1.1:</b> Comply with CALGreen Tier 1 standards*	<b>Complies.</b> The proposed project would implement required green building strategies to comply with Tier 1 CALGreen standards. The proposed project includes sustainability design features that support the Green Building Strategy. <sup>1</sup>
<b>1.1.3:</b> After 2020, all new development will utilize zero net electricity*	<b>Complies.</b> The proposed project would be required to comply with California's Building Energy Efficiency Standards, which require all new residential development after 2020 to include solar panels to offset 100 percent of buildings energy use. <sup>1</sup> The proposed project is being designed with all electric appliances and would include on-site solar energy systems to achieve zero net electricity as required by the City.
<b>1.3.1:</b> Install real-time energy monitors to track energy use*	<b>Complies.</b> The proposed project would be built to comply with all regulations.
<b>1.4.2:</b> Comply with the City's tree preservation ordinance*	<b>Complies.</b> The project site contains multiple trees, particularly adjacent to buildings, parking areas, walkways and along the boundaries of the project site.

New Development Checklist Measures	Project Consistency
<b>1.4.3:</b> Provide public and private trees in compliance with the Zoning Code*	<b>Complies.</b> The proposed project would be required to provide trees in compliance with the City's Zoning Code.
<b>1.5:</b> Install new sidewalks and paving with high solar reflectivity materials*	<b>Not applicable.</b> Not applicable to private drive aisles and pathways.
<b>4.1.2:</b> Install bicycle parking consistent with regulations*	<b>Complies.</b> As described in the Project Description, the proposed project would install 98 bicycle parking spaces consistent with regulations.
<b>4.3.5:</b> Encourage new employers of 50+ to provide subsidized transit passes*	<b>Not applicable.</b> The proposed project is a residential development that would employ only four full-time employees, two of which would live on-site.
<b>5.2.1:</b> Provide alternative fuels at new refueling stations*	<b>Not applicable.</b> The proposed project would not include refueling stations.
<b>6.1.3:</b> Increase diversion of construction waste*	<b>Complies.</b> The proposed project would include diversion of construction waste.
<b>7.1.1:</b> Reduce potable water use for outdoor landscaping*	<b>Complies.</b> The proposed project landscaping would be irrigated with recycled water from the City's existing urban reuse main that serves the site.
<b>7.1.3:</b> Use water meters which track real-time water use*	<b>Complies.</b> The proposed project would include water meters in accordance with City standards.
<b>7.3.2:</b> Meet on-site meter separation requirements in locations with current or future recycled water capabilities*	<b>Complies.</b> The proposed project would meet on-site meter separation requirements.
<b>9.1.3:</b> Install low water use landscapes*	<b>Complies.</b> The proposed project would conform to the City's WELO, which requires low water use landscape designs. <sup>2</sup>
<b>9.2.1:</b> Minimize construction equipment idling time to 5 minutes or less*	<b>Complies.</b> The proposed project would ensure that construction equipment idling time is minimized to 5 minutes or less.
<b>9.2.2:</b> Maintain construction equipment per manufacturer's specs*	<b>Complies.</b> The proposed project would maintain construction equipment per manufacturer's specifications.
<b>9.2.3:</b> Limit GHG construction equipment emissions by using electrified equipment or alternative fuels*	<b>Complies.</b> The proposed project would limit GHG construction equipment emissions by using electrified equipment or alternative fuels.
<b>Voluntary Measures</b>	
<b>2.1.3:</b> Pre-wire and pre-plumb for solar thermal or photovoltaic (PV) systems	<b>Complies.</b> The proposed project would include pre-wire and pre-plumb for solar thermal or PV systems.
<b>3.1.2:</b> Support implementation of station plans and corridor plans	<b>Not applicable.</b> The proposed project site is not located within a station or corridor plan.
<b>3.2.1:</b> Provide on-site services such as ATMs or dry cleaning to site users	<b>Not applicable.</b> The apartment community would not include any commercial services on-site.
<b>3.2.2:</b> Improve non-vehicular network to promote walking, biking	<b>Complies.</b> The proposed project would extend the creekside trail out to West College Avenue.



New Development Checklist Measures	Project Consistency
<b>3.2.3:</b> Support mixed-use, higher-density development near services	<b>Complies.</b> The proposed project would support higher density development. The General Plan designates the project site as Medium High-Density Residential, which permits between 18-30 units per acre. The proposed project would have a density of 28.9 units per acre. In addition, the project site is located approximately 25 feet from the nearest bus stop located on West College Avenue at Navarro Drive.
<b>3.3.1:</b> Provide affordable housing near transit	<b>Complies.</b> The proposed project would be comprised of 35 percent affordable housing units, and the project site is located approximately 25 feet from the nearest bus stop located on West College Avenue at Navarro Drive.
<b>3.5.1:</b> Unbundle parking from property cost	<b>Not applicable.</b> Low Income Housing financing programs do not allow charging for parking in addition to apartment rent.
<b>3.6.1:</b> Install calming features to improve ped/bike experience	<b>Complies.</b> Central parkway path from West College Avenue through to the main building/clubhouse entry would include a raised walk across the drive aisle combining traffic calming features at high traffic area with enhanced pedestrian experience.
<b>4.1.1:</b> Implement the Bicycle and Pedestrian Master Plan	<b>Complies.</b> West College Avenue is equipped with a bicycle lane. The proposed project would extend the existing multi-purpose trail along College Creek out to West College Avenue for improved access to the trail system.
<b>4.1.3:</b> Provide bicycle safety training to residents, employees, motorists	<b>Complies.</b> The clubhouse print-media station may include Bicycle Safety Tips brochures as well as the City's Map of Bicycle and Pedestrian Facilities.
<b>4.2.2:</b> Provide safe spaces to wait for bus arrival	<b>Complies.</b> The proposed project is located approximately 400 feet from the West Side Bus Transfer Center. The clubhouse lobby may also be furnished to provide a comfortable waiting area for dial-a-ride and shared ride services.
<b>4.3.2:</b> Work with large employers to provide rideshare programs	<b>Not applicable.</b> The proposed project is a residential development and would not include a commercial component.
<b>4.3.3:</b> Consider expanding employee programs promoting transit use	
<b>4.3.4:</b> Provide awards for employee use of alternative commute options	
<b>4.3.7:</b> Provide space for additional park-and-ride lots	<b>Not applicable.</b>
<b>4.5.1:</b> Include facilities for employees that promote telecommuting	<b>Not applicable.</b> The proposed project is a residential development and would not include a commercial component.
<b>5.1.2:</b> Install electric vehicle charging equipment	<b>Complies.</b> The proposed project would install 15 percent of spaces (41 spaces) electric vehicle charging equipment.



New Development Checklist Measures	Project Consistency
<b>8.1.3:</b> Establish community gardens and urban farms	<b>Not applicable.</b>
<b>9.1.2:</b> Provide outdoor electrical outlets for charging lawn equipment	<b>Complies.</b> The proposed project would provide electrical outlets in accessible areas to be used for landscaping equipment per the requirements of the Municipal Code.
<p>Notes:</p> <p><sup>1</sup> California Energy Commission. 2019. Building Energy Efficiency Standards—Title 24. Website: <a href="https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards">https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards</a>. Accessed November 22, 2019.</p> <p><sup>2</sup> City of Santa Rosa. 2019. Santa Rosa City Code, Chapter 14-30 Water Efficient Landscape. Website: <a href="https://qcode.us/codes/santarosa/">https://qcode.us/codes/santarosa/</a>. Accessed November 22, 2019.</p> <p>Source of policy and project requirements: City of Santa Rosa. 2012. City of Santa Rosa Climate Action Plan, Appendix B: CAP New Development Checklist. Website: <a href="https://srcity.org/DocumentCenter/View/10762">https://srcity.org/DocumentCenter/View/10762</a>. Accessed November 22, 2019.</p>	

According to the City of Santa Rosa's Planning Department, an updated New Development Checklist is currently being developed;<sup>50</sup> however, because it has not yet been officially adopted by the City, this Consistency Checklist evaluates the proposed project with respect to the existing New Development Checklist provided in the City's June 5, 2012 CAP. As a condition of approval, the proposed project would incorporate measures from the New Development Checklist applicable at the time building permits are issued, and the applicant would demonstrate to the City's satisfaction that the proposed project would be constructed and operated consistent with measures required in the applicable CAP Development Checklist in effect at that time. Therefore, the proposed project would comply with a Qualified GHG Reduction Strategy. In addition, residential uses were an anticipated use for this site in the General Plan FEIR. Therefore, the proposed project would not result in peculiar effects and would not result in new or greater impacts related to net increase in GHG emissions than analyzed in the General Plan FEIR.

#### **b) Greenhouse Gas Reduction Plan Conflict**

Would the project: *Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The General Plan FEIR evaluated if buildout of the General Plan would conflict California's AB 32 Climate Change Scoping Plan. The General Plan FEIR concluded that although General Plan policies would reduce the impacts to the maximum extent feasible, there would still be a significant and unavoidable impact.

This impact is evaluated based on project compliance with (1) the City's CAP and (2) the ARB adopted 2017 Climate Change Scoping Plan Update.

<sup>50</sup> Monet Sheikhal, City Planner, City of Santa Rosa and Susie Murray, Senior Planner, City of Santa Rosa. Personal communication (phone calls and emails) with Eric Soycher, Environmental Analyst, FirstCarbon Solutions. September 2019.

## City of Santa Rosa Climate Action Plan

Significance for this impact is determined by project compliance with the City of Santa Rosa CAP. It is acknowledged that the City's CAP's planning horizon of 2020 has passed; however, as described under Impact Q(a), implementation of the measures included in the City's CAP are expected to decrease GHG emissions to 2.3 MT CO<sub>2</sub>e per person per year by year 2035,<sup>51</sup> and it can be concluded that emissions would be below 2.6 MT CO<sub>2</sub>e per person per year (or a 40 percent reduction below 2020 thresholds) by year 2030. The actions and measures from the City's CAP are still applicable to the proposed project and are evaluated below. Proposed project compliance with the Santa Rosa CAP policies and requirements are shown in Table 18. As shown in the table, the proposed project would comply with all applicable requirements.

**Table 18: Consistency with the Santa Rosa Climate Action Plan**

Measure	Action Item	Project Compliance
<b>Energy Efficiency in Existing Buildings:</b> Facilitate energy efficiency upgrades and retrofits in existing commercial, residential, and industrial buildings by connecting residents and businesses with technical and financial assistance.	Connect businesses and residents with voluntary programs that provide free or low-cost energy efficiency audits and financing assistance for energy efficient appliances.	<b>Complies.</b> The proposed project is a new development project, and, therefore, the voluntary programs that provide free or low-cost energy efficiency audits and financing assistance for energy efficient appliances in existing buildings would not be applicable. However, the proposed project would comply with the latest energy efficiency standards and incorporate applicable energy efficiency features designed to reduce project energy consumption. <sup>1</sup>
	Work with the Sonoma County Energy Independence Program to offer low-interest financing and technical assistance to property owners for energy efficiency retrofits.	<b>Not applicable.</b> The proposed project is a new development project and would not include retrofits.
<b>Smart Meter Utilization:</b> Encourage existing development and require new development to utilize PG&E's Smart Meter system to facilitate energy and cost savings.	Require new construction and major remodels to install real-time energy monitors that allow building users to track their current energy use.	<b>Complies.</b> As described in the Project Description, the proposed project would be served with electricity generated by Sonoma Clean Power and delivered by PG&E. The proposed project would be built to comply with all regulations.
<b>Cool Roofs and Pavements:</b> Require new sidewalks, crosswalks,	Adopt an ordinance that requires and specifies cool paving materials for new	<b>Complies.</b> The proposed project would be required to

<sup>51</sup> City of Santa Rosa Community Development. 2012. Climate Action Plan: City of Santa Rosa. Website: <https://srcity.org/DocumentCenter/View/10762/Climate-Action-Plan-PDF?bidId=>. Accessed May 26, 2020. June 5.

Measure	Action Item	Project Compliance
and parking lots to be made of cool paving materials with a high solar reflectivity.	parking lots, sidewalks, roofs, and crosswalks and integrates Low Impact Development guidelines for new construction and Capital Improvement Projects.	construct paved areas in accordance with General Plan Policy H-G-2.2
	Ensure the cool roof and paving ordinance includes cool roof specifications which allow for green or living roofs and address energy installations on historic structures consistent with the Secretary of Interior's Rehabilitation Standards. Allow darker-color roofs when they meet cool roof standards.	<b>Complies.</b> The proposed project would comply with Title 24, which requires new buildings to be made of cool paving materials and be "solar ready." <sup>1</sup> In addition, the proposed project would achieve net zero electricity through a combination of on-site solar and the purchase of renewable electricity.
<b>Tree Planting and Urban Forestry:</b> Plant and maintain trees on private property, streets, and open space areas.	Require new development to supply an adequate number of street trees and private trees.	<b>Complies.</b> The project site contains and includes planting of multiple trees, particularly adjacent to buildings, parking areas, walkways and along the boundaries of the project site.
<b>Energy-Efficient Appliances:</b> Facilitate the efficient use of energy for appliances in residential, commercial, and industrial buildings.	Seek funding sources to develop a rebate program for residents and businesses to exchange inefficient appliances with Energy Star certified models.	<b>Complies.</b> Implementation of the proposed project would not preclude future residents from exchanging any inefficient appliances with Energy Star verified models. Moreover, all proposed project appliances would meet the latest Title 24 efficiency requirements. <sup>1</sup>
<b>Appliance Electrification:</b> encourage residents and businesses to switch natural-gas-powered appliances to electric power, where appropriate.	Utilize the energy-efficient appliance rebate program to facilitate the replacement of natural gas equipment with electric-powered equipment.	<b>Complies.</b> Implementation of the proposed project would not preclude future residents from exchanging any inefficient appliances with Energy Star verified models. Moreover, all proposed project appliances would meet the latest Title 24 efficiency requirements. <sup>1</sup>
	Identify opportunities to implement additional programs that will switch appliances from natural gas to electricity.	<b>Not applicable.</b> The proposed project is a new development.
<b>Water Conservation:</b> Continue to require and incentive water conservation.	Require new development to reduce potable water use in accordance with the Tier 1 standards of CALGreen.	<b>Complies.</b> The proposed project would implement required green building strategies to comply with Tier 1 CALGreen standards. The

Measure	Action Item	Project Compliance
		proposed project includes sustainability design features that support the Green Building Strategy. <sup>1</sup>
	Continue and expand water conservation efforts including water-efficient landscaping, rainwater harvesting, and high-efficiency appliance and fixture installations.	<b>Complies.</b> The proposed project would conform to the City's Water Efficient Landscape Ordinance (WELO) <sup>3</sup> and the California Green Building Standards Code. <sup>1</sup>
	Replace water meters in Santa Rosa with meters that allow residents and businesses to track real-time water use through the City's online web application.	<b>Complies.</b> The proposed project would include water meters in accordance with City standards.
	Encourage existing development and require new development to utilize smart water meters to facilitate water and cost savings.	<b>Complies.</b> The proposed project would be built to comply with all regulations.
<b>Lawn and Garden Activity:</b> Encourage the use of electrified and higher-efficiency lawn and garden equipment.	Support the BAAQMD's efforts to re-establish a voluntary exchange program for residential lawn mowers and backpack-style leaf blowers.	<b>Not applicable.</b> This measure applies to government agencies and not individual development projects.
	Encourage new buildings to provide electrical outlets on the exterior in an accessible location to charge electric-powered lawn and garden equipment.	<b>Complies.</b> The proposed project would provide electrical outlets in areas accessible per the requirements of the City Code to be used for landscaping equipment.
	Encourage the replacement of existing high-maintenance and high-water use landscapes (such as removing turf through the Green Exchange rebate program) with low water use vegetation to reduce the need for gas-powered lawn and garden equipment.	<b>Complies.</b> The proposed project would conform to the City's WELO and other outdoor water efficiency requirements. <sup>3</sup>
<b>Construction Emissions:</b> Reduce emissions from heavy-duty construction equipment by limiting idling and utilizing cleaner fuels, equipment, and vehicles.	Minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes or less (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Provide clear signage at all access points to remind employees of idling restrictions.	<b>Complies.</b> The proposed project would comply with California Code of Regulations Title 13, Section 2485.
	Construction equipment shall be maintained in accordance with manufacturer's specifications.	<b>Complies.</b> All project-related construction equipment shall be maintained in accordance

Measure	Action Item	Project Compliance
		with manufacturer's specifications.
	<p>Work with project applicants to limit GHG emissions from construction equipment by selecting one of the following measures, at a minimum, as appropriate to the construction project:</p> <ul style="list-style-type: none"> <li>a. Substitute electrified equipment for diesel- and gasoline-powered equipment where practical.</li> <li>b. Use alternative fuels for construction equipment on-site, where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel.</li> <li>c. Avoid the use of on-site generators by connecting to grid electricity or utilizing solar-powered equipment.</li> </ul>	<b>Not proposed.</b> This is a voluntary measure that is not proposed at this time.
<p>Notes:</p> <p><sup>1</sup> California Energy Commission (CEC). 2019. 2019 Building Energy Efficiency Standards. Website: <a href="https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency">https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency</a>. Accessed November 22, 2019.</p> <p><sup>2</sup> City of Santa Rosa. 2009. City of Santa Rosa General Plan 2035. November 3. Website: <a href="https://srcity.org/392/General-Plan">https://srcity.org/392/General-Plan</a>. Accessed November 22, 2019.</p> <p><sup>3</sup> City of Santa Rosa. 2019. Santa Rosa City Code, Chapter 14-30 Water Efficient Landscape. Website: <a href="https://qcode.us/codes/santarosa/">https://qcode.us/codes/santarosa/</a>. Accessed November 22, 2019.</p> <p>Source of policy and project requirements: City of Santa Rosa. 2012. City of Santa Rosa Climate Action Plan (Santa Rosa CAP). Website: <a href="https://srcity.org/DocumentCenter/View/10762">https://srcity.org/DocumentCenter/View/10762</a>. Accessed November 22, 2019.</p>		

### ***Santa Rosa Climate Action Plan New Development Checklist***

To ensure new development projects comply with the Santa Rosa CAP, the City of Santa Rosa developed the New Development Checklist as described in Impact Q(a). As shown in Table 17, the proposed project would comply with all applicable requirements of the New Development Checklist. As discussed in Impact Q(a), as a condition of approval, the proposed project would incorporate measures from the New Development Checklist applicable at the time building permits are issued, and the applicant would demonstrate to the City's satisfaction that the proposed project would be constructed and operated to be consistent with measures required in the applicable CAP New Development Checklist in effect at that time.

### **SB 32 2017 Scoping Plan Update**

The 2017 Climate Change Scoping Plan Update addressing the SB 32 targets was adopted on December 14, 2017.<sup>52</sup> Table 19 provides an analysis of the proposed project's consistency with measures included in the 2017 Scoping Plan Update. As shown in the table, many of the measures

<sup>52</sup> California Air Resource Board (ARB). 2017. California's 2017 Climate Change Scoping Plan. November.

are not applicable to the proposed project, and the proposed project is consistent with strategies that are applicable.

**Table 19: Consistency with SB 32 2017 Scoping Plan Update**

2017 Scoping Plan Update Reduction Measure	Project Consistency
<b>SB 350: 50 Percent Renewable Mandate.</b> Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020 to 50 percent in 2030.	<b>Not applicable.</b> This measure would apply to utilities and not to individual development projects. The proposed project would purchase electricity from PG&E or Sonoma Clean Power subject to the SB 350 Renewable Mandate.
<b>SB 350 Double Building Energy Efficiency by 2030.</b> This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.	<b>Not applicable.</b> This measure applies to existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency over time. The proposed project would comply with the applicable Title 24 Energy Efficiency Standards in effect at the time building permits are received.
<b>Low Carbon Fuel Standard.</b> This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	<b>Not applicable.</b> This is a Statewide measure that cannot be implemented by a project applicant or lead agency. However, vehicles accessing the proposed residential buildings at the project site would benefit from the standards.
<b>Mobile Source Strategy (Cleaner Technology and Fuels Scenario).</b> Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million Zero Emission Vehicles (ZEVs) on the road by 2030 and increasing numbers of ZEV trucks and buses.	<b>Not applicable.</b> This measure is not applicable to the project; however, vehicles accessing the project site would benefit from the increased availability of cleaner technology and fuels. Future residents and visitors can be expected to purchase increasing numbers of more fuel-efficient and zero emission cars and trucks each year. Furthermore, delivery trucks and buses that would serve future residents will be made by increasing numbers of ZEV delivery trucks.
<b>Sustainable Freight Action Plan.</b> The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	<b>Not applicable.</b> This measure applies to owners and operators of trucks and freight operations. The proposed project is residential in nature and would not support truck and freight operations. It is expected that deliveries throughout the State would be made with an increasing number of ZEV delivery trucks, including deliveries that would be made to future residents.
<b>Short-lived Climate Pollutant (SLCP) Reduction Strategy.</b> The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	<b>Consistent.</b> Consistent with BAAQMD Regulation 6, Rule 3, no wood-burning devices are proposed as part of the project. Therefore, the proposed project would not include major sources of black carbon.

2017 Scoping Plan Update Reduction Measure	Project Consistency
<b>SB 375 Sustainable Communities Strategies.</b> Requires Regional Transportation Plans to include a Sustainable Communities Strategy for reduction of per capita vehicle miles traveled.	<b>Not applicable.</b> The proposed project does not include the development of a Regional Transportation Plan.
<b>Post-2020 Cap-and-Trade Program.</b> The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	<b>Not applicable.</b> The proposed project is not one targeted by the cap-and-trade system regulations, and, therefore, this measure does not apply to the project. However, the post-2020 Cap-and-Trade Program indirectly affects people and entities who use the products and services produced by the regulated industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers.
<b>Natural and Working Lands Action Plan.</b> The ARB is working in coordination with several other agencies at the federal, State, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the governor's Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California's natural and working land.	<b>Not applicable.</b> The proposed project is residential development in a built-up urban area and would not be considered natural or working lands.
Source of ARB 2017 Scoping Plan Update Reduction Measures: California Air Resource Board (ARB). 2017. California's 2017 Climate Change Scoping Plan. November. Website: <a href="https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf">https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf</a> . Accessed August 2019.	

## Conclusion

The proposed project's consistency with the goals, policies, and actions set forth in the City's CAP ensures that the proposed project would not impede or interfere with the City's goals or the goal to achieve the AB 32 state-recommended reduction targets. The proposed project is consistent with the applicable local plans, policies, and regulations included in the City's CAP and would not conflict with the provisions of any other State or regional plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. Furthermore, as shown in Table 19 implementation of the proposed project would not conflict with the reduction measures proposed in SB 32. In addition, the applicable measures included in the City's CAP, as shown in Table 18, are included as part of the proposed project design and would reduce project-related GHG emissions. As a condition of approval, the proposed project would incorporate measures from the New Development Checklist applicable at the time building permits are issued, and the applicant would demonstrate to the City's satisfaction that the proposed project would be constructed and operated to be consistent with measures required in the applicable CAP Development Checklist in effect at that time.

Therefore, the proposed project would not result in peculiar effects and would not result in new or more severe impacts related to conflicts with applicable greenhouse gas reduction plans than previously analyzed in the General Plan FEIR.



Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>R. Wildfire</b> <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	LTS	No	No	No	No
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	LTS	No	No	No	No
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	LTS	No	No	No	No
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

**a) Emergency Response/Evacuation Plan Consistency**

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

As discussed previously in Impact N(g), the General Plan FEIR determined that future development would impact emergency response plans due to increased traffic congestion. In addition, the General Plan FEIR determined that development near the UGB under the proposed General Plan would increase risk from wildland fires due to the proximity of development to open areas of grassland or chaparral. However, the General Plan identifies policies, General Plan Policies PSF-E-1, PSF-E-2, PSF-E-3, PSF-E-5, and NS-G-1 through NS-G-6, which would assist with the deployment of emergency response plans and evacuation plans, and implementation would reduce impacts to a less than significant level.



The project site is not designated within a CAL FIRE “Very High Fire Hazard Severity Zone” in a Local Responsibility Area (LRA) nor a fire hazard zone in a State Responsibility Area (SRA).<sup>53</sup> Further, the proposed project is located in an urban area and the open space area to the south is City maintained. The proposed project would include two driveways that would connect to West College Avenue in compliance with the Santa Rosa City Code and the California Fire Code. The LHMP designates emergency evacuation routes, including U.S. 101, Highway 12 and Fountaingrove Parkway-Mission Boulevard. The project site is located adjacent to West College Avenue and, as a result, would not interfere with evacuation along these routes. Additionally, the project does not propose permanent road closures or lane narrowing that would impact an emergency response plan or evacuation plan. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to emergency response plans beyond what was previously analyzed in the General Plan FEIR.

**b) Expose Project Occupants to Pollutant Concentrations from Wildfire**

Would the project: *Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

The General Plan FEIR determined that development near the UGB under the proposed General Plan would increase risk from wildland fires due to the proximity of development to open areas of grassland or chaparral. General Plan Policies NS-G-1 through NS-G-6 require proposed development to minimize fire hazards and vulnerability and the General Plan FEIR determined that implementation of these policies would reduce impacts to a less than significant level.

The project site is not located adjacent to the UGB. It is located within a flat, highly urbanized area of the City. The BAAQMD monitors wind speeds at two locations near Santa Rosa, Napa and Sonoma Baylands, which are approximately 25 miles southeast and south of the project site. These areas are located in a similar climate as the City of Santa Rosa and, as such, have similar average wind speeds. The average wind speeds in these areas in 2019 ranged from 4 mph to 9 mph. As a result, the proposed project is not located on a project site with severe slopes or high prevailing winds that would further exacerbate wildfire risk. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to exposure of project occupants to pollutants concentrations from wildfire beyond what was previously analyzed in the General Plan FEIR.

<sup>53</sup> California Department of Forestry and Fire Protection (CAL FIRE). 2008. Fire Hazard Severity Zones Maps. Website: <https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>. Accessed December 26, 2019,

**c) Infrastructure That Exacerbates Fire Risk**

Would the project: *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The General Plan FEIR determined that new development could potentially require the installation of infrastructure that exacerbates fire risk. General Plan Policies NS-G-1 through NS-G-6 require proposed development to minimize fire hazards and vulnerability. The General Plan FEIR concluded that new development would implement General Plan policies that would regulate the development of infrastructure that could exacerbate fire risk and infrastructure would be designed to reduce impacts from wildfires; the General Plan FEIR concluded implementation of these policies would reduce impacts to a less than significant level.

The project site is located within a flat, highly urbanized area of the City of Santa Rosa. The project site is surrounded by single-family homes and roads to the west, north, and east while a City utilities facility with maintained open space is located to the south. Pursuant to General Plan Policy NS-G-2, the proposed project would be equipped with fire sprinklers. In addition, the proposed project would comply with the applicable fire safety provisions of the CBC, thereby reducing the risk of damage from fire to the maximum extent practicable. The proposed project would not include new roadways, fire breaks, installation of emergency water sources, or overhead power lines. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to infrastructure that exacerbates fire risk beyond what was previously analyzed in the General Plan FEIR.

**d) Flooding and Landslide Hazards Due to Post-fire Slope Instability/Drainage Changes**

Would the project: *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The General Plan FEIR determined that new development would potentially increase wildland fire risk. General Plan Policies NS-G-1 through NS-G-6 require proposed development to minimize fire hazards and vulnerability. The General Plan FEIR concluded that new development would implement General Plan policies designed to reduce impacts from wildfires and implementation of these General Plan policies would reduce impacts to a less than significant level.

The project site is located within a flat, highly urbanized area of the City of Santa Rosa that has not experienced wildfire. Although the City of Santa Rosa has experienced significant damage from recent wildfires, the project site has not previously been directly damaged. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to post-fire slope instability or drainage changes beyond what was previously analyzed in the General Plan FEIR.

Environmental Issues	CEQA Section 15183(b) Criteria				
	Prior General Plan FEIR Determination	Effect Peculiar to Project or Site?	New Significant Effect?	New Significant Off-site, Cumulative Impact?	New Information, More Severe Adverse Impact?
<b>S. Tribal Cultural Resources</b> <i>Would the project:</i>					
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	LTS	No	No	No	No
b) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?	LTS	No	No	No	No
No Impact; LTS = Less than significant; LTSM = Less than significant with mitigation; SU = Significant and unavoidable					

The analysis in this section is based on the site-specific Cultural Resources Study prepared by Tom Origer & Associates on November 15, 2019 and tribal consultation conducted by the City. All supporting material is included as Appendix E.

### Native American Heritage Commission Sacred Lands File Record Search and Tribal Consultation

Tom Origer & Associates sent a letter to the Native American Heritage Commission (NAHC) to determine whether any sacred sites are listed on its Sacred Lands File for the project site. A response

from the NAHC was received on October 9, 2019, indicating that the Sacred Lands File search failed to indicate the presence of Native American cultural resources in the immediate project area. The NAHC included a list of seven local tribal representatives available for consultation. To ensure that all Native American knowledge and potential prehistoric concerns about the proposed project are addressed, a letter containing project information and requesting any additional information was sent to each tribal representative.

A response was received from the Federated Indians of Graton Rancheria on October 16, 2019, stating that the project area is within ancestral territory and they requested the results of research efforts and recommendations. In addition, a response was received from the Lytton Rancheria of California on November 5, 2019, stating that the tribe has no additional information. However, the Tribe believes the project area is within their traditional Pomo territory and they would like to be in consultation with the lead agency regarding the proposed project.

Tribal consultation efforts were conducted by the City of Santa Rosa pursuant to AB 52 and the City sent letters to Lytton Rancheria of California and the Federated Indians of Graton Rancheria on March 16, 2020. During this period one response was received from Brenda L. Tomaras, a representative for the Lytton Rancheria, on April 15, 2020 requesting a review of the Cultural Resources Study. Upon review of the Cultural Resources Study, Ms. Tomaras requested archaeological/tribal cultural monitoring ground-disturbing activities in previously undisturbed native soils be included as a condition of project approval. To date, no other responses have been received.

**a) Significance of Tribal Cultural Resource and Eligibility for California Register Listing**

Would the project: *Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*

The General Plan FEIR indicated that implementation of the General Plan policies would generally help protect Santa Rosa's Native American resources and Native American human remains. The General Plan FEIR concluded that implementation of Policies HP-A-1 through HP-A-5 would ensure individual projects demonstrate general consistency with State regulations related to cultural resources. Through implementation of these policies, it determined that impacts to tribal cultural resources would be less than significant.

A review of the California Register of Historical Resources, local registers of historic resources, a records search conducted at the NWIC, and an NAHC sacred lands file failed to identify any listed tribal cultural resources that may be adversely affected by the proposed project.<sup>54</sup> As such, no

<sup>54</sup> Tom Origer & Associates. 2019. Cultural Resources Study of the Property at 2150 West College Avenue Santa Rosa, Sonoma County, California. November.

eligible or potentially eligible tribal cultural resources would be adversely affected by the proposed project. This condition precludes the potential for new impacts to the significance of tribal cultural resources defined in Public Resources Code Section 21074 or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts with respect to a substantial adverse change related to a TCR or site listed in the California Register of Historic Resources beyond what was previously analyzed in the General Plan FEIR.

**b) Significance of Tribal Cultural Resource and Eligibility as Determined by Lead Agency**

Would the project: *Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

The General Plan FEIR indicated that implementation of the General Plan policies would generally help protect Santa Rosa's Native American resources. The General Plan FEIR concluded that implementation of Policies HP-A-1 through HP-A-5 would ensure individual projects demonstrate general consistency with State regulations related to cultural resources. Specifically, General Plan Policies HP-A-4 requires consultation "with local Native American tribes to identify, evaluate, and appropriately address cultural resources and tribal sacred sites through the development review process."<sup>55</sup> In addition Policy HP-A-5 would "ensure that Native American human remains are treated with sensitivity and dignity and assure compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98."<sup>56</sup> The General Plan FEIR concluded that implementation of Policies HP-A-1 through HP-A-5 would ensure individual projects demonstrate general consistency with State regulations related to cultural resources and that impacts would be less than significant.

As described previously, tribal consultation efforts were conducted by the City of Santa Rosa pursuant to AB 52 and the City sent letters to Lytton Rancheria of California and the Federated Indians of Graton Rancheria on March 16, 2020. One response was received from Brenda L. Tomaras, a representative for the Lytton Rancheria, on April 15, 2020. Upon reviewing the project's Cultural Resources Study, the Lytton Rancheria requested that the project include archaeological/tribal monitoring during ground disturbance activity in areas of the project site that contain previously undisturbed native soils. The City will require this archaeological/tribal monitoring as a condition of approval. Therefore, the proposed project would not result in any peculiar effects and would not result in new or more severe impacts related to a substantial adverse change in the significance of a tribal cultural resource Tribal Cultural Resources beyond what was previously analyzed in the General Plan FEIR.

<sup>55</sup> City of Santa Rosa. 2009. Santa Rosa General Plan 2035. Page 4.J-11. November.

<sup>56</sup> Ibid.

## SECTION 5: FINDINGS

As illustrated in the preceding Environmental Checklist, the proposed project is found to be in conformance with the analysis and conclusions of the General Plan FEIR, the General Plan FEIR adequately anticipated and described the impacts of the proposed project. Consistent with the mandate in the State CEQA Guidelines Section 15183, no further environmental review is required based on the following findings:

1. The proposed project is consistent with the development density established by the General Plan policies for which an EIR was certified in November 3, 2009 (State Clearinghouse No. 2008092114);
2. There are no new significant effects peculiar to the proposed project or its site;
3. There are no new significant effects that were not previously evaluated in the General Plan FEIR;
4. There are no new significant off-site or cumulative impacts that were not analyzed in the General Plan FEIR; and
5. There are no adverse impacts that are more severe than those previously identified in the General Plan FEIR.

### Conclusions

No further action is required and a Notice of Determination (pursuant to CEQA Guidelines Section 15094) can be filed indicating that the project is eligible for an exemption from additional environmental review under CEQA Guidelines Section 15183.

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