Draft Environmental Impact Report

Roseland Creek Community Park Master Plan

SCH No. 2022080148

Prepared by

City of Santa Rosa

In Consultation with

DAVID J. POWERS & ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS & PLANNERS

April 2024

TABLE OF CONTENTS

Figures

Photos

Tables

Appendices

SECTION 1.0 SUMMARY

The City of Santa Rosa, as the Lead Agency, has prepared this Draft Environmental Impact Report (EIR) for the Roseland Creek Community Park Master Plan in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

As the CEQA Lead Agency for this project, the City of Santa Rosa is required to consider the information in the EIR along with any other available information in deciding whether to approve the project. The basic requirements for an EIR include discussions of the environmental setting, significant environmental impacts including growth-inducing impacts, cumulative impacts, mitigation measures, and alternatives. It is not the intent of an EIR to recommend either approval or denial of a project.

Summary of the Project Location and Description

The approximately 19.49-acre project site consists of four City-owned parcels located at 1027 McMinn Avenue, and 1360, 1370 and 1400 Burbank Avenue in the Roseland area of southwest Santa Rosa, Sonoma County. The proposed Master Plan would construct a new community park to serve the Roseland neighborhood on the site that was previously developed with three single-family dwellings, a barn, and associated outbuildings that have since been demolished. Remnant improvements associated with prior development on the site such as foundations, building pads, driveways, refuse, fences, and underground utilities are proposed to be removed with the project. The proposed community park would largely preserve and enhance the existing natural habitat on-site. The proposed community park would include two parking lots, multi-use trails, a nature center, a restroom building, picnic areas, a play area, a lawn area, and a sports court.

Summary of Significant Impacts and Mitigation Measures

The following is a summary of the significant impacts and mitigation measures addressed within this EIR. The project description and full discussion of impacts and mitigation measures can be found in Section 2.0 Project Description and Section 3.0 Environmental Setting, Impacts, and Mitigation.

Impact	Mitigation Measures
Biological Resources	
Impact BIO-1a: Demolition of the footbridge and tree removal on the project site could potentially impact special-status bat species that may use them as a roost, and could result in the direct removal, abandonment, or destruction of the maternity roost.	**MM BIO-1a.1:** A qualified biologist shall conduct a roost assessment survey of trees and structures located within the project site prior to removal. The survey will assess use of the features for roosting as well as potential presence of bats. If the biologist finds no evidence of, or potential to support bat roosting, no further measures are recommended as long as removal occurs within seven days of the survey. If evidence of bat roosting is present, additional measures described below shall be implemented: • If evidence of bat roosting is discovered during the pre-construction roost assessment and demolition is planned August 1 through February 28 (outside the bat maternity roosting season), a qualified biologist should implement passive exclusion

	measures to prevent bats from re-entering the structures. After sufficient time to allow bats to escape and a follow-up survey to determine if bats have vacated the roost, demolition may continue and impacts to special-status bat species will be avoided. For tree removal that occurs during this time, trees should be felled in a two-step method as follows: o Remove limbs of trees first and leave them unprocessed on the site for at least 24 hours. o After the 24 hour period passes, the remainder of the tree can be felled and debris can be processed. • If a pre-construction roost assessment discovers evidence of bat roosting in structures or trees during the maternity roosting season (March 1 through July 31), and determines maternity roosting bats are present, demolition of maternity roost structures will be avoided during the maternity roosting season or until a qualified biologist determines the roost has been vacated. Any trees removed during this time shall follow the two-step method of removal described above. **(Less Than Significant Impact with Mitigation Incorporated)**
Impact BIO-1b: Construction activities associated with the project could potentially impact NPT adjacent to Roseland Creek.	To avoid impacting NPT, a pre-construction survey shall determine if the species or its nests are present within work impact areas within 300 feet of Roseland Creek. The pre-construction survey shall be completed within 48 hours prior to commencement of work to locate any NPT nests or individual turtles. If no NPT are located, the work may proceed without further actions. If NPT or active NPT nests are found within the work area, they shall be avoided by 50 feet and be allowed to leave on their own accord. If NPT is in a work area that cannot be avoided and/or does not leave the area, CDFW shall be consulted to determine the procedure for relocation. Any active NPT nest shall be avoided by 15 feet and if it cannot be avoided, CDFW shall be consulted to determine next steps. If NPT is listed under the Federal Endangered Species Act, and cannot be avoided, CDFW and USFWS shall be consulted to determine next steps, as no "take" can occur without USFWS authorization. **(Less Than Significant Impact with Mitigation Incorporated)**
Impact BIO-1c: Construction activities associated with the project could potentially impact CTS occurring on the site and up to 1.37 acres of upland dispersal habitat.	**MM BIO-1c.1:** The project shall implement the following avoidance and mitigation measures contained in the Santa Rosa Plan Conservation Strategy: • No ground disturbing activities shall be conducted during the wet season (October 15 through June 15) when CTS migrate to and from breeding habitats. • The City or the project biologist shall consult the 72-hour weather forecast from the National Weather Service (NWS) prior to the start of ground disturbing activities. Ground disturbing activities shall not begin unless a no precipitation forecast is

	obtained and necessary erosion control measures are implemented. • Prior to the commencement of ground disturbing activities, the site shall be inspected for burrows or other refugia that could support CTS. If none are detected, work can proceed without further measures. If burrows or other refugia with potential to support CTS are detected and cannot be avoided, the project shall consult with CDFW to determine if any additional measures, including an incidental take permit, may be required. • To substantiate that no CTS are present and/or affected by the project, a qualified biological monitor will be present during initial ground disturbance. The biological monitor will conduct a training session for all construction workers before work is started on the project. If any CTS are encountered during ground disturbing activities, all work will stop and not commence until authorization to commence work has been given by CDFW and USFWS. Such authorization may come in the form of take permits, if required. • Access routes and number and size of staging and work areas will be limited to the minimum necessary. • All foods and food-related trash items will be enclosed in sealed trash containers at the end of each day, and removed completely from the site once every three days. • No pets will be allowed anywhere in the project site during construction. • All equipment will be maintained such that there will be no leaks of automotive fluids such as gasoline, oils, or solvents. • Hazardous materials such as fuels, oils, solvents, etc., will be stored in sealable containers in a designated location that is at least 200 feet from Roseland Creek. All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 200 feet from Roseland Creek. **MM BIO-1c.2:** If it is determined that an incidental take permit is needed because a reasonable expectation of take has been found and cannot be avoided, mitigation for impacts to CTS may be determined to be necessary. In this case, CTS habitat that is permanently and adversely impacted by the project would be mitigated in accordance with the ratios described in the Santa Rosa Plain Conservation Strategy. The applicable ratio for mitigation in this area is one to one. This ratio would be applied to the net loss of suitable CTS habitat that results from the project. The square footage of developed areas on-site that would be removed (resulting in temporary impacts of approximately 1.88 acres), and restored to their natural state, may be used to offset novel impacts that result from the project. A maximum of 1.37 acres of permanent impacts are expected to result from the project, however, final mitigation ratio and acreage requirements shall be finalized in consultation with CDFW and/or the USFWS.

	Permanent loss of CTS habitat shall be mitigated at a one to one ratio. **(Less Than Significant Impact with Mitigation Incorporated)**
Impact BIO-4: Construction activities and tree removal associated with the proposed project could result in the loss of fertile eggs, nesting raptors and other migratory birds. Nest abandonment could also occur.	**MM BIO-4.1:** Construction shall be scheduled to avoid the nesting season to the extent feasible. The nesting season for most birds, including most raptors in the San Francisco Bay area, extends from February 1 through September 1. **MM BIO-4.2:** If it is not possible to schedule demolition and construction between September and January, pre-construction surveys for nesting birds shall be completed by a qualified ornithologist no more than seven (7) days prior to the start of work to ensure that no nests will be disturbed during project implementation. During this survey, the ornithologist will inspect all trees and other possible nesting habitats immediately adjacent to the construction areas for nests. If an active nest is found sufficiently close to work areas to be disturbed by construction, the ornithologist, in consultation with CDFW, will determine the extent of a construction-free buffer zone to be established around the nest, typically 50 to 250 feet with the lesser distance for smaller passerine birds and the greater distance for raptors, to ensure that raptor or migratory bird nests will not be disturbed during project construction. Project activities may resume within the buffer zone only after the young have fledged the nest or the nest otherwise becomes inactive. If disturbance does not commence within 7 days of the completed nesting survey, the survey should be repeated to ensure that active nesting has not begun since the previous survey. **(Less Than Significant Impact with Mitigation Incorporated)**
Cultural Resources	
Impact CUL-3: Construction activities associated with the proposed project could result in the disturbance of subsurface prehistoric and/or historic resources, including a 19th century cemetery.	**MM CUL-3.1:** No prehistoric or historical archaeological sites were found within the study area but a 19th century cemetery is reported to be within the study area. Therefore, any ground disturbing activities in the northeast part of the parcel at 1400 Burbank Avenue (APN 125-331-001) shall be monitored by a professional archaeologist and/or a tribal monitor from culturally affiliated Tribe(s). Implementation of the following mitigation measures will reduce potential impacts to prehistoric and historic resources to less than significant levels. • If cultural resources are discovered during the project construction (inadvertent discoveries), all work in the area of the find shall cease and a qualified archaeologist and representatives of the culturally affiliated tribe(s) shall be retained by the project sponsor to investigate the find and make recommendations as to treatment and mitigation of any impacts to those resources. A qualified archaeological monitor will be present and will have the authority to stop and redirect grading activities, in consultation

	with any designated tribal monitors, to evaluate the significance of any archaeological resources discovered on the property. • If human remains are encountered, consistent with California Health and Safety Code Section 7050.5, no further disturbance shall occur until the Sonoma County Coroner has made the necessary findings as to origin of the remains. Further, consistent with California Public Resources Code Section 5097.98(b), human remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. • If the Sonoma County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within twenty-four (24) hours. The Native American Heritage Commission shall immediately identify the "most likely descendant(s)" and notify them of the discovery. The "most likely descendant(s)" shall make recommendations within forty-eight (48) hours, and engage in consultations with the landowner concerning the treatment of the remains, as provided in Public Resources Code Section 5097.98. **(Less Than Significant Impact with Mitigation Incorporated)**
Hazards and Hazardous Materials	
Impact HAZ-2: The presence of lead in soils adjacent to previous structures on the site and a reported refuse dump on the northwest side of Roseland Creek containing glass containers and household debris including automobile parts could present a material threat of a potential release of hazardous substances.	**MM HAZ-2.1:** Any debris or soil containing lead-based paint or coatings or known to contain elevated lead concentrations would be disposed of at landfills that meet acceptance criteria for the waste being disposed. Soil sampling and analytical testing shall be performed on that portion of the site identified as the "refuse dump" in the report entitled Phase I Environmental Site Assessment, Roseland Creek Community Park, 1400 Burbank Avenue, APN 125-331-001, Santa Rosa, California, prepared by Econ, dated February 19, 2010. If hazardous materials are detected at levels that exceed regulatory thresholds, the extent of the contamination shall be identified, and recommendations for a Health and Safety Plan (HSP), Soil Management Plan (SMP), and methods for a cleanup shall be implemented, as applicable. This work shall be performed under the oversight of a regulatory agency such as the Sonoma County Department of Environmental Health and Safety or the Department of Toxic Substances Control. **(Less Than Significant with Mitigation Incorporated)**

Noise	
Impact NOI-1: The project would construct a proposed park adjacent to noise sensitive, residential and educational uses which could result in temporary disturbances during construction.	**MM NOI-1.1:** The City's contractor will develop a construction noise mitigation plan to ensure noise levels would be reduced to 80 dBA L_{eq} at sensitive receptors. The construction noise mitigation plan may incorporate, but would not be limited to, the following best management practices: • Maximize the physical separation between noise generators and noise receptors. Such separation includes, but is not limited to, the following measures: o Locate stationary equipment to minimize noise impacts on the community; o Minimize backing movements of equipment; • Construct temporary noise barriers, where feasible, to screen noise-generating equipment. Temporary noise barrier fences would provide a five dBA noise reduction where the noise barrier interrupts the line-of-sight between the noise source and receptor when constructed in a manner that eliminates any cracks or gaps. • Use quiet construction equipment whenever possible and properly maintained and muffled internal combustion engine-driven construction equipment; • Impact equipment (e.g., jack hammers and pavement breakers) shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools. • Compressed air exhaust silencers shall be used on other equipment. • Prohibit unnecessary idling of internal combustion engines. • Limit construction hours from 7:00 am to 7:00 pm Mondays through Saturdays, and 10:00 am to 6:00 pm on Sundays and holidays. • The Director of Recreation and Parks shall designate a "disturbance coordinator" for construction activities. The coordinator would be responsible for responding to any local complaints regarding construction noise and vibration. The coordinator would determine the cause of the noise or vibration complaint and would implement reasonable measures to correct the problem. • The construction contractor shall send advance notice in conjunction with the City of Santa Rosa Recreation and Parks Department to neighborhood residents within 300 feet of the project site as well as the Roseland Elementary School and Roseland Accelerated Middle School administrators regarding the construction schedule and including the telephone number for the disturbance coordinator at the construction site. **(Less Than Significant with Mitigation Incorporated)**

Summary of Project Alternatives

The California Environmental Quality Act (CEQA) requires that an EIR identify alternatives to the project as proposed. The CEQA Guidelines state that an EIR must identify a reasonable range of alternatives that would feasibly attain most of the basic objectives of the project, but avoid or substantially lessen significant environmental effects, or further reduce impacts that are considered less than significant with the incorporation of mitigation. A summary of project alternatives follows. A full analysis of project alternatives is provided in Section 7.0 Alternatives.

No Project Alternative

The No Project Alternative is what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. The No Project Alternative assumes that the project site would remain as it is today with only remnant improvements such as foundations, building pads, driveways, refuse, fences, and underground utilities from the former residential uses on the site. All environmental impacts of the project would be avoided with this alternative.

No Project – Existing General Plan Development Alternative

The No Project – Existing General Plan Development Alternative assumes a portion of the project site (1370 Burbank Avenue) would redevelop consistent with its current General Plan designation of *Medium – Density Residential*. The *Medium Density – Residential* designation permits a range of housing types, including single family attached and multifamily developments with a density of 8.0-18.0 units per acre. Thus, development of the 2.61-acre parcel at 1370 Burbank Avenue would result in approximately 21 to 47 residential units. Associated infrastructure and roadway improvements would also be required to accommodate new residential development.

Development of 21 to 47 residential units under the No Project – Existing General Plan Development Alternative would require a longer and more intensive construction period, with more grading and paving required. Thus, the No Project – Existing General Plan Development Alternative would result in greater construction-related impacts on air quality, GHG emissions, and noise. Operation of the No Project – Existing General Plan Development Alternative would also result in a greater demand on utilities, energy resources, and local public services. This alternative would also increase the biological resource mitigation requirements for the site given the reduction in open space. The project would result in similar to greater vehicle miles traveled (VMT) impacts depending on the level of density developed. The No Project – Existing General Plan Development Alternative would not meet any of the project objectives.

Active Use Master Plan Alternative

The Active Use Master Plan Alternative was considered by the City and Board of Community Services that considered a variety of active park uses including on the northerly three parcels of the park property. The Active Use Master Plan Alternative assumes a public gathering area with a restroom and shaded pavilion where the former residence at 1027 McMinn Avenue was located. A semi-circular driveway would be provided from Burbank Avenue in front of the nature center and would provide access to a single large parking lot for the nature center and dog park. A group picnic

area and dog park would be provided behind the nature center on the 1370 Burbank Avenue property. South of Roseland Creek an expanded turf area would be provided with a picnic area along the southern property boundary and a Pomo interpretive area. This Master Plan Alternative would also construct sidewalk along the Burbank Avenue project frontage, on-street parking, and a bike lane.

The Active Use Master Plan Alternative would result in increased construction period and operational air quality emissions, GHG emissions, and noise from construction activity and increased vehicle trips. This alternative would also increase biological impacts requiring mitigation due to the removal of the purple needlegrass habitat for the larger lawn area. Energy use during construction and water use during operation would also increase with this alternative. The Active Use Master Plan Alternative would meet most of the City's core objectives of providing a publicly accessible park, developed consistent with existing conservation easements and ADA accessible spaces. This alternative would not meet other core objectives to provide parking near play areas and locations for barbecues south of Roseland Creek. The Active Use Master Plan Alternative would also meet some of the City's full project objectives to provide gathering spaces, provide sport courts and fitness equipment, provide a lawn area, and provide active use amenities.

Artificial Turf Field Alternative

The Artificial Turf Field Alternative assumes that the proposed multi-use lawn area would be landscaped with artificial turf rather than grass. The Artificial Turf Field Alternative would use less water during operation of the proposed community park. This alternative would increase impacts to biological resources on the site as the artificial surface would be considered hardscape and may increase the need for mitigation credits. Energy use and GHG emissions would be reduced during the operational phase given that the artificial turf field would not need to be mowed. LID treatment areas would need to be increased to capture and treat stormwater runoff from hardscape areas. All other environmental impacts would be the same as the proposed project. The Artificial Turf Field Alternative would meet all of the objectives of the project as it would only change the type of field provided on the 1400 Burbank Avenue portion of the project site.

Neighborwood Master Plan Alternative

The Neighborwood Master Plan Alternative is based on a proposal submitted to the City by a citizens' group that assumes development of one, 12-space parking lot adjacent to a smaller nature center at 1370 Burbank Avenue and a native plant greenhouse/nursery. This alternative includes a secondary emergency vehicle access at 1400 Burbank Avenue but would not include any parking spaces in the park south of Roseland Creek. The area south of the creek would also include a children's play area, two picnic tables, and upland habitat restoration with native plants to replace the lawn area. On the northerly end of the park property near Burbank Avenue, three seasonal wetlands would be constructed, and additional upland habitat restoration would occur in the non-native grassland area on this portion of the site.

The Neighborwood Master Plan Alternative would result in slightly less impacts in most resource areas due to the limited number of improvements on the site. Temporary construction impacts on the northernmost parcel on the site would increase due to the construction of seasonal wetlands and the need to import soil and construct conveyance features to supply water to the wetlands. The Neighborwood Master Plan Alternative would provide some recreational opportunities, primarily for

residents within walking distance of the site but would not meet the City's core objective of accommodating residents within a one-mile radius due to its reduced number of parking spaces. The Neighborwood Master Plan Alternative would not meet the City's core objectives of providing barbecues and parking in proximity to picnic and play areas. This alternative would provide more limited ADA-compliant features and reduce the variety of amenities available to the community as compared to the proposed project. This alternative would also not meet the City's full project objectives of providing community gardens, fitness equipment and sport court areas, or a lawn or turf area for recreational use. This alternative, therefore, would meet some of the project objectives but to a more limited extent.

2010 Concept Plan Alternative

The 2010 Concept Plan Alternative would provide a nature center at 1370 Burbank Avenue accessed by a semi-circular driveway with a single, large parking lot. No vehicular access south of Roseland Creek would be provided. A large constructed wetland would be located on the eastern side of 1370 Burbank Avenue with an adjacent outdoor classroom and just north of the Roseland Creek riparian zone. Four smaller constructed wetlands would be located in the northwestern portion of the park. Native grassland restoration would be located in the northeastern portion of the site. Trails would be located throughout the park and two bridges would cross Roseland Creek. A large lawn area would be located south of Roseland Creek. Picnic areas, a restroom, Pomo Interpretive Village, and children's play area would also be located south of Roseland Creek.

The 2010 Concept Plan Alternative would result in increased construction period impacts for air quality, energy, and GHG emissions due to the larger lawn area and construction of wetlands on the site. Biological resource impacts would increase due to the removal of purple needlegrass habitat and need for mitigation. Water use during operation of the project would increase due to the larger lawn area. All other resources area impacts would be similar to the project or slightly reduced. The 2010 Concept Plan Alternative would meet most of the City's core project objectives by providing a park use serving residents within a one-mile radius, consistent with existing conservation easements, and ADA accessible trails. The 2010 Concept Plan Alternative would not meet the City's core objective to provide parking near play areas and locations for barbecues south of Roseland Creek. The 2010 Concept Plan Alternative would meet some of the City's full objectives by providing a large lawn area, picnic areas, and an outdoor classroom. This alternative, therefore, would meet some of the project objectives but to a more limited extent. .

Environmentally Superior Alternative

The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. As described in Section 7.0 Alternatives, the environmentally superior alternative to the proposed project is the No Project Alternative because all of the project's significant environmental impacts would be avoided. In addition to the No Project Alternative, the Neighborwood Master Plan Alternative would lessen several of the project's less than significant impacts due to reduced activity on the project site but would not meet all of the City's objectives for the project.

Areas of Public Controversy

Environmental concerns from local residents, property owners, organizations, and/or agencies about the project are related to:

- Air Quality
- Biological Resources
- Cultural Resources
- Hydrology
- Transportation/Traffic Congestion
- Wildfire

SECTION 1.0 INTRODUCTION

1.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The City of Santa Rosa, as the Lead Agency, has prepared this Draft Environmental Impact Report (EIR) for the Roseland Creek Community Park Master Plan in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines.

As described in CEQA Guidelines Section 15121(a), an EIR is an informational document that assesses potential environmental impacts of a proposed project, as well as identifies mitigation measures and alternatives to the proposed project that could reduce or avoid adverse environmental impacts (CEQA Guidelines 15121(a)). As the CEQA Lead Agency for this project, the City of Santa Rosa is required to consider the information in the EIR along with any other available information in deciding whether to approve the project. The City must also respond to each significant effect identified in the EIR by making findings under Section 15091 and if necessary by making a statement of overriding consideration under Section 15093. The basic requirements for an EIR include discussions of the environmental setting, significant environmental impacts including growth-inducing impacts, cumulative impacts, mitigation measures, and alternatives. It is not the intent of an EIR to recommend either approval or denial of a project.

As described in CEQA Guidelines Section 15151, an EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good-faith effort at full disclosure.

1.1.1 Disagreement Among Experts

In compliance with CEQA Guidelines Section 15151 (see above), the following discussion summarizes the main points of disagreement among experts related to the project. There is disagreement among experts regarding the existing wildlife habitat and biodiversity at the project site, particularly regarding California Tiger Salamanders (CTS). The biological consulting firm WRA, Inc. has determined (in Appendix B) that CTS are unlikely to occur on-site and that with implementation of recommended mitigation measures, impacts to this species and other potentially occurring special-status wildlife species would be less than significant.

An independent review of WRA's 2019 Biological Resources Assessment was conducted by Dr. Shawn Smallwood and submitted in response to the EIR Notice of Preparation. Dr. Smallwood asserted that WRA's Biological Resources Assessment did not correctly characterize the environmental setting of the project site and did not adequately assess the project's impact on wildlife. Dr. Smallwood argued that the project site likely contains more species, and several more special-status species than were accounted for by WRA. Dr. Smallwood also pointed out that WRA did not conduct surveys on properties south of the project site and thus, that it could not be determined that CTS are absent from those properties. Because of this, Dr. Smallwood asserted that

WRA did not adequately assess impacts to CTS because their analysis did not address whether there are barriers to undocumented extant CTS breeding occurrences in these properties south of the project site. Additionally, Dr. Smallwood claimed that WRA wrongly concluded that CTS are unlikely to occur on-site because there are no mammal burrows present. According to Dr. Smallwood, CTS also utilize soil cracks to enter and exit subterranean environments. Additional comments by Dr. Smallwood noted that WRA mischaracterized California black walnut habitat, did not adequately assess cumulative impacts to wildlife, and did not provide sufficient mitigation measures.

WRA has since provided responses to Dr. Smallwood's comments to the City and has updated their Biological Resources Assessment. WRA found that many of Dr. Smallwood's arguments were based on speculation, did not utilize habitat evaluation criteria, and were not substantiated by evidence. Per *Gray v. County of Madera* (2008), "CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project. The fact that additional studies might be helpful does not mean that they are required."[1] Thus, WRA found that Dr. Smallwood's recommendations for further surveys and conclusions were not supported by substantial evidence.

Based on the discussion above, the City concurs with WRA's analysis of the project site and has incorporated their findings and recommendations into this EIR.

1.2 EIR PROCESS

1.2.1 Notice of Preparation and Scoping

In accordance with Section 15082 of the CEQA Guidelines, the City of Santa Rosa prepared a Notice of Preparation (NOP) for this EIR. The NOP was circulated to local, state, and federal agencies on August 8, 2022. The standard 30-day comment period concluded on September 9, 2022. The NOP provided a general description of the proposed project and identified possible environmental impacts that could result from implementation of the project. The City of Santa Rosa also held a public scoping meeting on August 17, 2022, to discuss the project and solicit public input as to the scope and contents of this EIR. The meeting was held virtually. Appendix A of this EIR includes the NOP and comments received on the NOP.

1.2.2 Draft EIR Public Review and Comment Period

Publication of this Draft EIR will mark the beginning of a 45-day public review period. During this period, the Draft EIR will be available to the public and local, state, and federal agencies for review and comment. Notice of the availability and completion of this Draft EIR will be sent directly to every agency, person, and organization that commented on the NOP, as well as the Office of Planning and Research.

[1] Gray v. County of Madera (2008) 167 Cal.App.4th 1099, 1125 (quoting Association of Irritated Residents v. County of Madera (2003) 107 Cal.App.4th 1383, 1396).

Written comments concerning the environmental review contained in this Draft EIR during the 45-day public review period should be sent to:

City of Santa Rosa
Recreation and Parks Department
55 Stony Point Road
Santa Rosa, CA 95401
Contact: Jen Santos, Deputy Director – Parks
Tel: (707) 543-3781
Email: jsantos@srcity.org

1.3 FINAL EIR/RESPONSES TO COMMENTS

Following the conclusion of the 45-day public review period, the City of Santa Rosa will prepare a Final EIR in conformance with CEQA Guidelines Section 15132. The Final EIR will consist of:

- Revisions to the Draft EIR text, as necessary;
- List of individuals and agencies commenting on the Draft EIR;
- Responses to comments received on the Draft EIR, in accordance with CEQA Guidelines (Section 15088);
- Copies of letters received on the Draft EIR.

Section 15091(a) of the CEQA Guidelines stipulates that no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings. If the lead agency approves a project despite it resulting in significant adverse environmental impacts that cannot be mitigated to a less than significant level, the agency must state the reasons for its action in writing. No significant unavoidable impacts have been identified for the project. As discussed in this EIR, all potentially significant impacts are anticipated to be reduced to a less than significant level with incorporation of mitigation measures. Therefore, no Statement of Overriding Considerations will be required for project approval.

1.3.1 Notice of Determination

If the project is approved, the City of Santa Rosa will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office and available for public inspection for 30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15094(g)).

SECTION 2.0 PROJECT INFORMATION AND DESCRIPTION

2.1 PROJECT LOCATION

The approximately 19.49-acre project site consists of four City-owned parcels located at 1027 McMinn Avenue, and 1360, 1370 and 1400 Burbank Avenue in the Roseland area of southwest Santa Rosa, Sonoma County.

2.2 PROJECT DESCRIPTION

2.2.1 Existing Setting

Roseland Creek flows from northeast to southwest through the lower portion of the site. The site is surrounded by single- and multi-family residential land uses on the north and east, by rural residential uses to the south, and by an elementary school to the west. Regional and vicinity maps of the site are shown on Figure 2.2-1 and Figure 2.2-2, and an aerial photograph of the project site and surrounding area is shown on Figure 2.2-3.

The site is mostly undeveloped and contains grassland, oak woodland and riparian habitat zones. The parcel located at the northeast corner of the site (1027 McMinn Avenue) formerly contained one single-family home. The parcels at 1370 Burbank Avenue and 1400 Burbank Avenue formerly contained two single-family dwellings, a barn, and several associated outbuildings. The structures on-site have since been removed and the remnant improvements associated with prior development on the site such as foundations, building pads, driveways, refuse, fences, and underground utilities are proposed to be removed with the project. There are also two existing domestic water wells on-site that are proposed to be capped and abandoned and a septic system that is proposed to be removed.

2.2.2 Proposed Development

2.2.2.1 *Access, Circulation, and Parking*

The project proposes to construct a new community park to serve the Roseland neighborhood. The proposed Master Plan for the park shows two paved vehicle entrances to the park, both from Burbank Avenue. Each of the two entrances leads to a small parking lot, the more northerly lot containing 19 parking spaces and the southerly lot containing 17 parking spaces. The proposed parking lots would both include a vehicular gate that would restrict access after-hours. The parking lots would be added concurrent with the proposed improvements they are intended to serve on each side of Roseland Creek. A multi-use trail runs from the southwest corner of the site to the northeast corner, following the south side of the Roseland Creek riparian corridor across the southern portion of the site and crossing the creek near the eastern park boundary. The proposed multi-use trail creek crossing would be a prefabricated bridge placed on abutments outside the top of bank. The multi–use trail meanders through the oak woodland habitat area in the center of the site and connects to McMinn Avenue. The trail would be a paved 10-foot-wide path with two-foot-wide gravel shoulders on either side, providing ADA access. A network of smaller trails and walkways would provide pedestrian circulation throughout the park, providing interconnectivity to the other features of the park as well as a pedestrian connection between the Burbank Avenue and McMinn Avenue neighborhoods on the west and east sides of the park. A secondary creek crossing on the western side of the park to connect the smaller proposed trails would also be a prefabricated bridge placed on abutments outside the top

of bank. All proposed parking areas and walkways would be constructed with permeable pavement, except for areas where extra support is needed for ADA compliance.

2.2.2.2 *Park Amenities and Natural Features*

The park is designed to preserve and enhance the habitat values of the existing grassland, oak woodland, riparian and purple needlegrass habitat areas on the site. Trails, interpretive signs, and upland habitat restoration in existing grasslands are proposed for the northern section of the park. The City, in coordination with community groups, would plant native grassland species to enhance and restore habitat in the northern section of the park. The central portion of the site contains the oak woodland habitat, which would be left intact and would also contain trails and interpretive signs. A nature center and restroom building would be constructed near the parking lot on the west side of the park, north of the creek. A picnic area and outdoor classroom or community garden are proposed to be located along the northern side of the riparian corridor at the edge of the oak woodland.

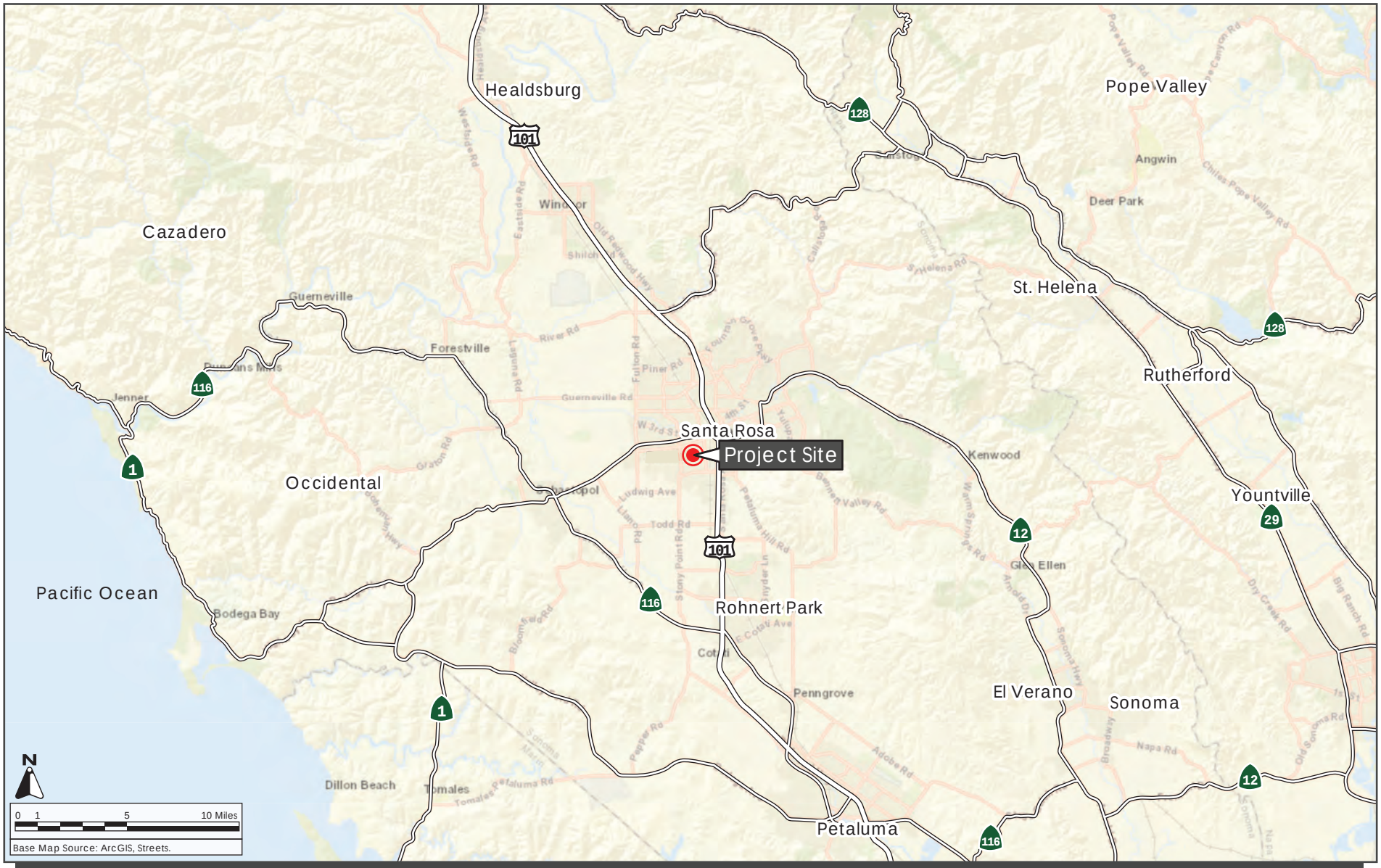
On the south side of the riparian corridor, there would be a restroom near the parking lot, picnic areas (including single-use BBQs), a nature-themed play area, a lawn area, and sports court. A trail surrounding the lawn and play areas would include fitness stations. The existing purple needlegrass grassland area near the southeast corner of the site would be preserved, with trails encircling it. A potential future off-site trail connection to the multi-use trail is proposed near the eastern park boundary along the south side of Roseland Creek. The Proposed Master Plan is shown on Figure 2.2-4.

2.2.2.3 *Hours of Operation*

The proposed park would operate from sunrise (6:00 a.m.) to sunset (6:00 p.m. PST or 9:00 p.m. PDT), seven days per week consistent with City policies. The proposed parking lots would include vehicular gates that would restrict access after-hours. The proposed gates would be opened and closed manually on a daily basis by the City.

2.2.2.4 *Conservation Easement*

Development of the proposed park on the project site would adhere to existing conservation easements on 1027 McMinn Avenue, and 1360 and 1400 Burbank Avenue that are held by the Sonoma County Agricultural Preservation and Open Space District (SCAPOSD). A conservation easement would also likely be granted for 1370 Burbank Avenue by the SCAPOSD. The conservation easement restricts development on the northerly two parcels to the development of minor structures and improvements in connection with low-intensity and educational uses. Impervious surfaces on the northerly parcels are also restricted to five percent of the total easement area. The conservation easement for 1400 Burbank Avenue limits structures and improvements within the “Natural Area” along Roseland Creek to trails and associated bridges which may provide emergency vehicle access. The easement also designates an “Oak Preservation Area” that allows for improvements in connection with low-intensity recreational and educational uses. Park improvements shall not result in impervious surfaces of more than 20 percent on the 1400 Burbank Avenue property. A conservation easement is anticipated to be granted for 1370 Burbank Avenue with similar provisions to the existing conservation easements on the project site and consistent with the proposed Master Plan.



REGIONAL MAP | FIGURE 2.2-1

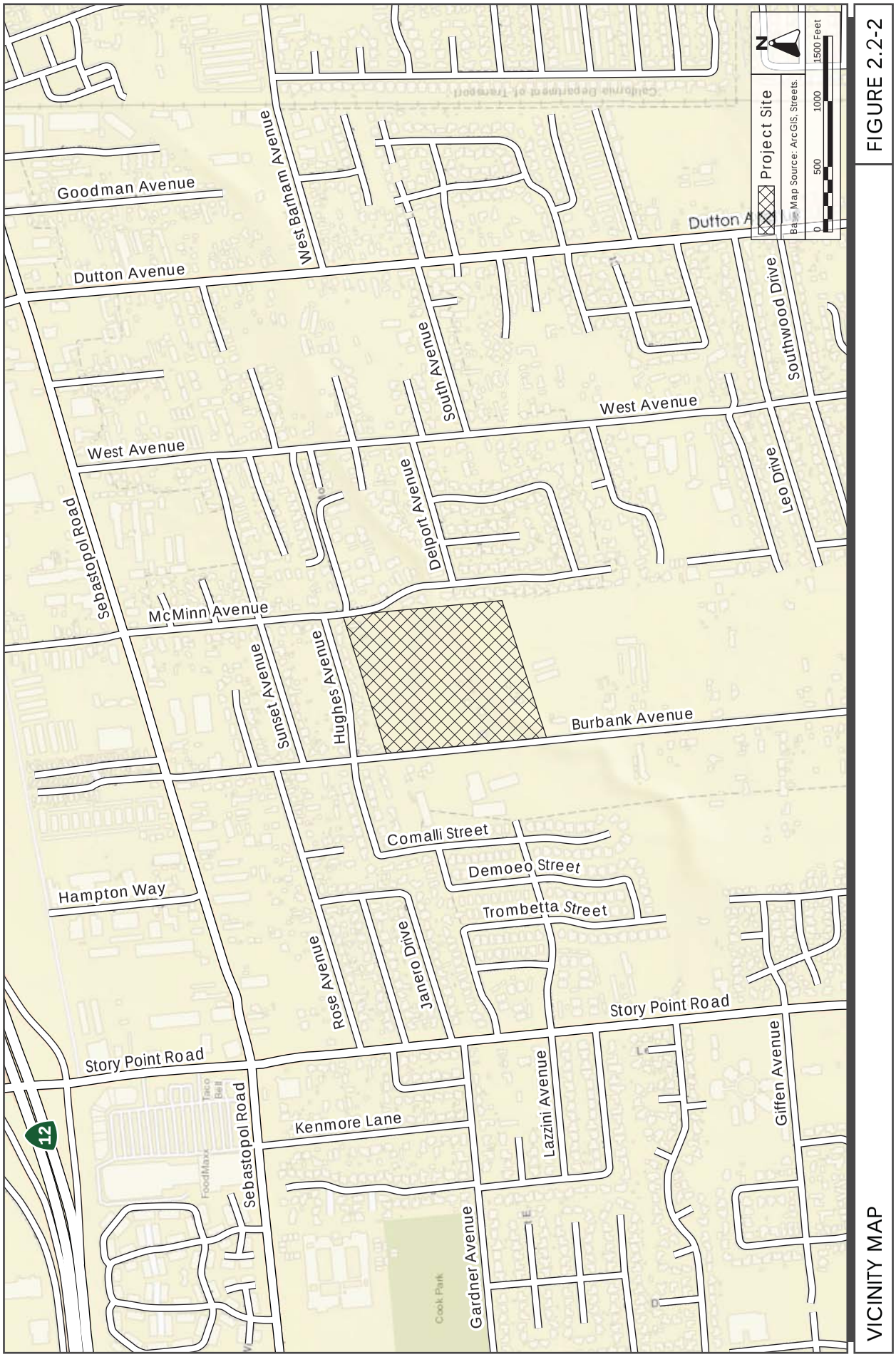
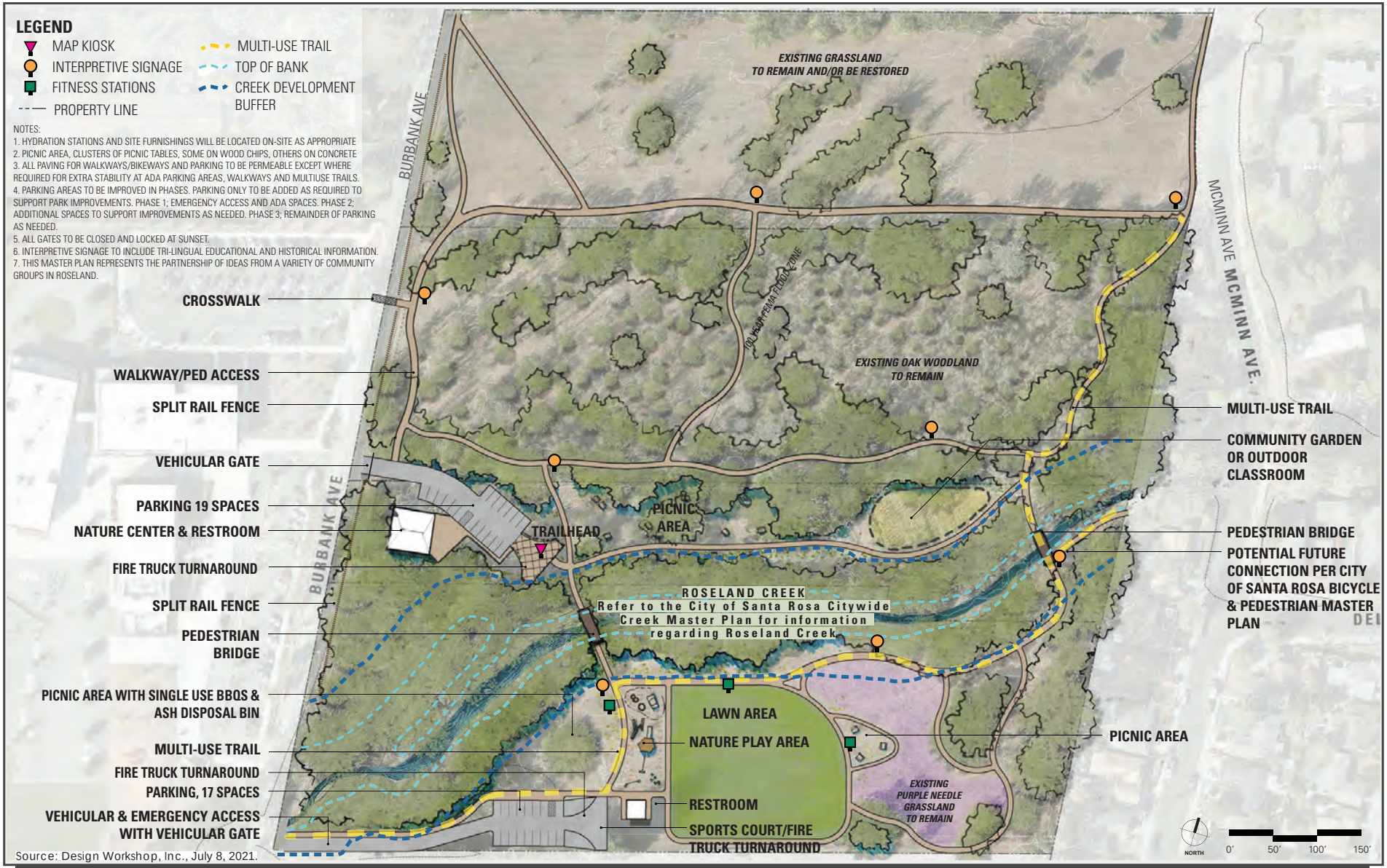


FIGURE 2.2-2

VICINITY MAP

AERIAL PHOTOGRAPH AND SURROUNDING LAND USES | FIGURE 2.2-3



Source: Design Workshop, Inc., July 8, 2021.

PROPOSED MASTER PLAN

FIGURE 2.2-4

2.3 PROJECT OBJECTIVES

Based on substantial community input received in over 30 meetings for the project, the City has identified a variety of objectives for the proposed park, as described below.

Core Project Objectives

The City's core objectives for Roseland Creek Community Park include the following:

- Increase park acreage in the southwest area of the City to meet General Plan standards of 3.5 acres of City parks per 1,000 residents, and
- Provide a publicly accessible Community Park in the Roseland area to serve residents generally within a one-mile radius with equal opportunities for passive and active recreation, and
- Develop park uses consistent with conservation easements held for the property by SCAPOSD, and
- Provide amenities for the site consistent with input provided by tribal nations registered with the City of Santa Rosa such as providing drinking fountains, restrooms, group picnic areas, barbecues, parking near play equipment and picnic areas, parking for elders, interpretation of tree species, and
- Provide non-permeable bicycle and pedestrian public access across and throughout the site for community members of all abilities, including ADA-compliant features to provide equal access for all, and
- Provide large industry standard and natural youth play equipment with areas for children ages 2-5 and 5-12, and
- Provide for emergency vehicle access to all areas of the park to ensure public safety.

Full Project Objectives

The City's full objectives for Roseland Creek Community Park, include the following:

- Provide spaces for picnic events, site specific unique features, natural areas, community gardens and a recreational facility for community use, and
- Provide fitness equipment and sport court areas for promoting a healthy lifestyle, and
- Provide one large, irrigated lawn area or artificial turf to allow for casual picnicking, casual ball and frisbee type play, yoga, casual children's activities and similar recreation on a stable lawn or artificial turf surface, and
- Provide active uses such as community garden and outdoor classroom gathering area, and
- Provide a park that minimizes the number of trees that need to be removed to improve the park site and provide recreation, and
- Provide interpretive and educational signs throughout the park in at least three different languages, and
- Provide fencing that will function as a natural barrier between vehicles and pedestrians traveling adjacent to Burbank Avenue and to help guide students to the future street crossing.

2.4 USES OF THE EIR

This EIR provides decision makers in the City of Santa Rosa (the Lead Agency), responsible agencies, and the general public with relevant environmental information to use in considering the proposed project. It is intended that this EIR be used for discretionary approvals necessary to implement the project, as proposed. These discretionary actions may include, but are not limited to, the following:

- General Plan Amendment
- Specific Plan Amendment
- Tree Removal Permit
- Grading Permit
- Building Permit
- Lake and Streambed Alteration Agreement (CDFW)
- Sonoma County Agricultural Preservation and Open Space District (SCAPOSD) Conservation Easement
- SCAPOSD Master Plan Approval

SECTION 3.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

3.1	Aesthetics	3.11	Land Use and Planning
3.2	Agriculture and Forestry Resources	3.12	Mineral Resources
3.3	Air Quality	3.13	Noise
3.4	Biological Resources	3.14	Population and Housing
3.5	Cultural Resources	3.15	Public Services
3.6	Energy	3.16	Recreation
3.7	Geology and Soils	3.17	Transportation
3.8	Greenhouse Gas Emissions	3.18	Tribal Cultural Resources
3.9	Hazards and Hazardous Materials	3.19	Utilities and Service Systems
3.10	Hydrology and Water Quality	3.20	Wildfire

The discussion for each environmental subject includes the following subsections:

Environmental Setting – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.

Impact Discussion – This subsection includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts.

- **Project Impacts** – This subsection discusses the project's impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. "Mitigation measures" are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Each impact is numbered using an alphanumeric system that identifies the environmental issue. For example, Impact HAZ-1 denotes the first potentially significant impact discussed in the Hazards and Hazardous Materials section. Mitigation measures are also numbered to correspond to the impact they address. For example, MM BIO-4.1 refers to the first mitigation measure for the fourth impact in the Biological Resources section.
- **Cumulative Impacts** – This subsection discusses the project's cumulative impact on the environmental subject. Cumulative impacts, as defined by CEQA, refer to two or more individual effects, which when combined, compound or increase other environmental impacts. Cumulative impacts may result from individually minor, but collectively significant effects taking place over a period of time. CEQA Guideline Section 15130 states that an EIR should discuss cumulative impacts "when the project's incremental effect is cumulatively considerable." The discussion does not need to be in as great detail as is necessary for project impacts, but is to be "guided by the standards of practicality and reasonableness." The purpose of the cumulative analysis is to allow decision makers to better understand the

impacts that might result from approval of past, present, and reasonably foreseeable future projects, in conjunction with the proposed project addressed in this EIR.

The CEQA Guidelines advise that a discussion of cumulative impacts should reflect both their severity and the likelihood of their occurrence (CEQA Guidelines Section 15130(b)). To accomplish these two objectives, the analysis should include either a list of past, present, and probable future projects or a summary of projections from an adopted general plan or similar document (CEQA Guidelines Section 15130(b)(1)). This EIR uses the list of projects approach.

The analysis must determine whether the project's contribution to any cumulatively significant impact is cumulatively considerable, as defined by CEQA Guideline Section 15065(a)(3). The cumulative impacts discussion for each environmental issue accordingly addresses the following issues: 1) would the effects of all of past, present, and probable future (pending) development result in a significant cumulative impact on the resource in question; and, if that cumulative impact is likely to be significant, 2) would the contribution from the proposed project to that significant cumulative impact be cumulatively considerable?

Table 3.0-1 identifies the approved (but not yet constructed or occupied) and pending projects in the project vicinity that are evaluated in the cumulative analysis.

Table 3.0-1: Cumulative Projects List

Name and Location	Description	Distance to Proposed Project	Status
Burbank Avenue Subdivision, 1690 Burbank Avenue	The project proposes to construct 62 single family detached two-story homes, 12 single-family attached two-story homes, and 64 apartment units in 4, 3-story buildings on a total of 14.25 acres.	190 feet to the south	Under Construction
Stony Point Flats Apartments, 2268 Stony Point Road	The project proposes to construct a new 50-unit affordable multifamily development on an undeveloped 2.9-acre parcel.	0.45 miles	Under Construction
Stony Oaks Apartments, 2542 Old Stony Point Road	The project proposes a 142-unit affordable four-story apartment development on a 4.39-acre site.	0.6 miles	Under Construction
Dutton Meadows Multi-Family Residential Project, 2684 Dutton Meadow	The project proposes to subdivide and develop the approximately 19-acre site with 137 single-family detached two-story homes for the purposes to a small-lot subdivision.	0.75 miles	Pending Review

For each resource area, cumulative impacts may occur over different geographic areas. For example, the project effects on air quality would combine with the effects of projects in the entire air basin, whereas noise impacts would primarily be localized to the surrounding area. The geographic area that could be affected by the proposed project varies depending upon the type of environmental issue being considered. Section 15130(b)(3) of the CEQA Guidelines states that lead agencies should define the geographic scope of the area affected by the cumulative effect. Table 3.0-2 provides a summary of the different geographic areas used to evaluate cumulative impacts.

Table 3.0-2: Geographic Considerations in Cumulative Analysis

Resource Area	Geographic Area
Aesthetics	Project site and adjacent parcels
Agriculture and Forestry Resources	Countywide
Air Quality	San Francisco Bay Area Air Basin
Biological Resources	Project site and adjacent parcels
Cultural Resources	Project site and adjacent parcels
Energy	Energy provider's territory
Geology and Soils	Project site and adjacent parcels
GHGs	Planet-wide
Hazards and Hazardous Materials	Project site and adjacent parcels
Hydrology and Water Quality	Roseland Creek watershed
Land Use and Planning/Population and Housing	Citywide
Minerals	Identified mineral recovery or resource area
Noise and Vibration	Project site and adjacent parcels
Public Services and Recreation	Citywide
Transportation/Traffic	Citywide
Tribal Cultural Resources	Project site and adjacent parcels
Utilities and Service Systems	Citywide
Wildfire	Within or adjacent to the wildfire hazard zone

3.1 AESTHETICS

3.1.1 Environmental Setting

3.1.1.1 *Regulatory Framework*

State

Streets and Highway Code Sections 260 through 263

The California Scenic Highway Program (Streets and Highway Code, Sections 260 through 263) is managed by the California Department of Transportation (Caltrans). The program is intended to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. State Route (SR) 116, the nearest officially designated State Scenic Highway, is located approximately 5.1 miles west of the project site. SR 12 has portions that are considered eligible as State Scenic Highways and portions that are officially designated. The nearest segment of SR 12 that is officially designated is located approximately 6.6 miles northeast of the project site. The nearest segment of SR 12 that is eligible as a State Scenic Highway is located approximately one mile northeast of the project site.

Local

Santa Rosa General Plan 2035

The General Plan contains goals and policies intended to preserve and enhance the scenic quality of designated roads in both the rural and developed areas of the City. The following General Plan policies are applicable to Burbank Avenue:

Policy	Description
T-G-4	Respect natural topography and landscaping during alignment of scenic roads. Protect land through careful grading.
T-G-5	Retain existing trees and vegetation along scenic roads, as possible. Enhance roadway appearance through landscaping, using native plant material.
T-G-6	Provide large setbacks from scenic roads, as possible, to avoid encroachment of buildings on the view of the roadway.
T-G-15	Require that scenic road rights-of-way are wide enough to preserve natural vegetation. Provide appropriate construction setbacks to retain views along the corridor.

Santa Rosa Zoning Code (City Code Title 20)

The following site planning and development standards contained in the Santa Rosa City Code (Title 20 – Zoning) apply to Burbank Avenue as a Scenic Road:

> *Burbank Avenue (from the northerly boundary of Roseland Creek Community Park to Hearn Avenue). Scenic characteristics consist of larger front setbacks than typically found in low density, single-family residential areas, and a narrow roadway width that provides a "country road" feel, as well as roadside trees that create an occasional wooded "tunnel"*

effect. The area has a semi-rural residential character, with more urbanized subdivisions to the north and south.

a. Minimum setback from Burbank Avenue:

(1) 20 feet measured from edge of pavement to one-story structure or element with a maximum height not exceeding 25 feet;

(2) 25 feet measured from edge of pavement to a two-story or greater structure or element, or one-story structure or element with height over 25 feet;

(3) Fences and walls, hedges, swimming pools, uncovered parking, uncovered decks, gazebos, and other decorative type accessory structures need only comply with the setbacks and other standards of the primary zoning district.

c. Roadway improvements. Roadway improvements along Burbank Avenue shall be designed consistent with the street sections included in the Roseland Area/Sebastopol Road Specific Plan.

3.1.1.2 *Existing Conditions*

The project site is located in the Roseland neighborhood, which was incorporated into the City of Santa Rosa in November 2017. Roseland is a predominantly single-family residential neighborhood some multi-family and large undeveloped properties. Roseland Creek runs in a southwesterly direction through the neighborhood. The 19.49-acre project site consists of four parcels of land that are primarily undeveloped, but previously contained single-family residences on three of the parcels. The site is bounded by McMinn Avenue on the east, and by Burbank Avenue, a designated Scenic Roadway, on the west. The Roseland Creek riparian corridor runs through the lower portion of the site. The site also includes an oak woodland habitat area, open space areas containing native grasses, and remnant orchard walnut trees. Photos of the site are shown on the following pages.

Surrounding Visual Character

The area surrounding the project site contains mostly residential uses, with single-family residences to the north, east and west, and multifamily buildings also on the east. There is an elementary school located across Burbank Avenue from the site on the west, and a single-family residence and storage buildings adjacent to the south side of the site.

Scenic Views and State Scenic Highways

The current view of the site from the surrounding neighborhood is of open space, oak woodland, densely wooded riparian corridor, and remnant improvements associated with the prior rural residences. Views of these open and undeveloped spaces are framed by the suburban residential development surrounding the site. Views of the site are limited to the adjacent roadways and urban development.

Photo 1: View of 1027 McMinn Avenue property, looking west, with remnant building foundation in the foreground.

Photo 2: View of 1370 Burbank Avenue property, looking southeast, with remnant fencing and building foundation in the foreground.

PHOTOS	1 & 2

Photo 3: Viewing west across the northern portion of the site from McMinn Avenue.

Photo 4: Viewing south toward the oak woodland habitat area from the northern portion of the site.

PHOTOS	3 & 4

Photo 5: Viewing south along the project site frontage on Burbank Avenue.

Photo 6: Viewing north along the project site frontage on Burbank Avenue from the Roseland Creek bridge.

PHOTOS	5 & 6

Photo 7: View east across the open grassland area in the southern portion of the site.

Photo 8: View east along the Roseland Creek riparian habitat area in the western portion of the site.

PHOTOS	7 & 8

There are no State Scenic Highways in the vicinity of the site that would be impacted by the project. Burbank Avenue, however, which forms the western boundary of the project site, is a designated Scenic Road in the Santa Rosa General Plan 2035.

3.1.2 Impact Discussion

For the purpose of determining the significance of the project's impact on aesthetics, except as provided in Public Resources Code Section 21099, would the project:

1) Have a substantial adverse effect on a scenic vista?
2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
3) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?[2] If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
4) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

3.1.2.1 *Project Impacts*

Impact AES-1:	The project would not have a substantial adverse effect on a scenic vista. **(Less than Significant Impact)**

Development of the proposed community park would have a minimal impact on any scenic vistas. As discussed previously, views across the site as it currently exists are limited to the boundaries of the site itself, and do not extend to any adjacent scenic lands beyond the site. Thus, there is no scenic vista that would be adversely affected. The proposed park improvements include the construction of several small structures, parking areas, walking trails and open space use areas such as picnic areas, a community garden or outdoor classroom, and a lawn area. The majority of the site, including the riparian corridor and oak woodland areas would remain undeveloped or be minimally developed with trails and open space uses that would not affect scenic vistas. **(Less Than Significant Impact)**

Impact AES-2:	The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. **(Less than Significant Impact)**

Implementation of the proposed community park project would require the removal of four heritage trees for the construction of parking areas and the proposed trail (refer to Section 3.4 Biological Resources). The tree removals would be subject to the provisions of the City's Tree Ordinance, which would require obtaining a permit and providing replacement trees as mitigation for trees removed. This would result in a less than significant impact. There are no rock outcroppings, historic buildings or State Scenic Highways on or adjacent to the site. The proposed improvements on the site

[2] Public views are those that are experienced from publicly accessible vantage points.

would conform to the General Plan policies and Zoning development standards for properties fronting Burbank Avenue. **(Less Than Significant Impact)**

Impact AES-3:	The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. **(Less than Significant Impact)**

As discussed previously, implementation of the proposed community park project would have a minimal impact upon the visual character or quality of the site because the number and size of the proposed structures would be small, and the proposed uses would be primarily of a passive open space nature – walking trails, interpretive signs, picnic areas, a community garden or outdoor classroom, and a lawn area. There would be minimal visual impacts to the existing oak woodland, riparian corridor and native grassland resource areas on the site. **(Less Than Significant Impact)**

Impact AES-4:	The project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. **(Less than Significant Impact)**

The proposed park project would only include lighting for the parking areas and within the nature center and restroom structures. The amount of glare produced by the proposed structures would be minimal. The proposed sports court and lawn area would not include lighting for evening use. The proposed park uses would not be considered substantial sources of light and glare, and would not result in significant impacts. **(Less Than Significant Impact)**

3.1.2.2 *Cumulative Impacts*

Impact AES-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant aesthetics impact. **(Less than Significant Cumulative Impact)**

The cumulative projects listed in Table 3.0-1 would involve more intensive development than the proposed Park Master Plan and would have a greater potential to obstruct views of scenic resources. The Roseland Area/Sebastopol Road Specific Plan EIR addressed all of the development identified in the cumulative project list (Table 3.0-1) and determined that with the implementation of General Plan policies, Specific Plan policies, existing City Design Guidelines, and Zoning Code regulations, development in the plan area would not result in significant cumulative impacts. The proposed community park would largely preserve scenic resources on-site and would include a limited number of structures. Thus, the project would not make a significant contribution toward a cumulative aesthetics impact. **(Less than Significant Cumulative Impact)**

3.2 AGRICULTURE AND FORESTRY RESOURCES

3.2.1 Environmental Setting

3.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is identified as Prime Farmland. In CEQA analyses, the FMMP classifications and published county maps are used, in part, to identify whether agricultural resources that could be affected are present on-site or in the project area.[3]

California Land Conservation Act

The California Land Conservation Act (Williamson Act) enables local governments to enter into contracts with private landowners to restrict parcels of land to agricultural or related open space uses. In return, landowners receive lower property tax assessments. In CEQA analyses, identification of properties that are under a Williamson Act contract is used to also identify sites that may contain agricultural resources or are zoned for agricultural uses.[4]

Fire and Resource Assessment Program

The California Department of Forestry and Fire Protection (CAL FIRE) identifies forest land, timberland, and lands zoned for timberland production that can (or do) support forestry resources.[5] Programs such as CAL FIRE's Fire and Resource Assessment Program and are used to identify whether forest land, timberland, or timberland production areas that could be affected are located on or adjacent to a project site.[6]

3.2.1.2 *Existing Conditions*

The project site consists of four parcels, which are primarily undeveloped, but previously contained single-family residences on three of the parcels. The project site contains native and non-native grasslands, remnant orchard trees, a riparian corridor, and an oak woodland area. The site is located in a developed suburban area and is surrounded by residential development on three sides. Portions of the site were formerly used as orchards, but the site is not designated as farmland or forest land.

[3] California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed April 29, 2022. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.
[4] California Department of Conservation. "Williamson Act." http://www.conservation.ca.gov/dlrp/lca.
[5] Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).
[6] California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed April 29, 2022. http://frap.fire.ca.gov/.

According to the Sonoma County Important Farmland 2018 map, the site is designated as Urban and Built-Up Land, defined as land that is "…occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures."

3.2.2 Impact Discussion

For the purpose of determining the significance of the project's impact on agriculture and forestry resources, would the project:

1) 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?
2) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
3) 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))?
4) Result in a loss of forest land or conversion of forest land to non-forest use?
5) 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?

3.2.2.1 *Project Impacts*

Impact AG-1:	The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. **(No Impact)**

The site does not currently contain any agricultural or farm uses and is designated on the Sonoma County Important Farmland 2018 map as Urban and Built-Up Land. The proposed community park project would not therefore convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. **(No Impact)**

Impact AG-2:	The project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. **(No Impact)**

The City of Santa Rosa Zoning Ordinance designates the project site as Open Space – Recreation (OSR-SR) and Multi Family Residential (R-3-18-SR) in a Scenic Road combining district (-SR). These zoning districts allow for open space, recreation, and multi-family residential development. No agricultural uses are allowed within these districts. There are no Williamson Act contracts recorded on the site. **(No Impact)**

Impact AG-3:	The project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. **(No Impact)**

The existing zoning on the project site, identified above, allows for open space, recreation, and residential use of the project site. There is no forest land or timberland in the vicinity of the project site. **(No Impact)**

Impact AG-4:	The project would not result in a loss of forest land or conversion of forest land to non-forest use. **(No Impact)**

The project site is not currently designated or zoned as forest land. Development of the proposed community park would result in the removal of four heritage trees and non-native vegetation (refer to Section 3.4 Biological Resources). Development of active park uses on the site would occur in existing developed areas of the site and non-native grasslands. The proposed project would not be considered a conversion of forest land to non-forest use. **(No Impact)**

Impact AG-5:	The project would not 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. **(No Impact)**

According to the Sonoma County Important Farmland 2018 map, the project site and surrounding area is designated as Urban and Built-Up Land. The development of the project site would not result in conversion of any forest or farmlands. **(No Impact)**

3.2.2.2 *Cumulative Impacts*

Impact AG-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant agricultural and forestry resources impact. **(No Cumulative Impact)**

The project would not have any impact on agricultural or forestry resources and, therefore, would not have any potential to contribute to a cumulative impact on agricultural and forestry resources. **(No Cumulative Impact)**

3.3 AIR QUALITY

3.3.1 Environmental Setting

3.3.1.1 *Background Information*

Criteria Pollutants

Air quality in the Bay Area is assessed related to six common air pollutants (referred to as criteria pollutants), including ground-level ozone (O_3), nitrogen oxides (NO_x), particulate matter (PM), carbon monoxide (CO), sulfur oxides (SO_x), and lead.[7] Criteria pollutants are regulated because they result in health effects. An overview of the sources of criteria pollutants and their associated health are summarized in Table 3.3-1. The most commonly regulated criteria pollutants in the Bay Area are discussed further below.

Table 3.3-1: Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O_3)	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	• Aggravation of respiratory and cardiovascular diseases • Irritation of eyes • Cardiopulmonary function impairment
Nitrogen Dioxide (NO_2)	Motor vehicle exhaust, high temperature stationary combustion, atmospheric reactions	• Aggravation of respiratory illness • Reduced visibility
Fine Particulate Matter ($PM_{2.5}$) and Coarse Particulate Matter (PM_{10})	Stationary combustion of solid fuels, construction activities, industrial processes, atmospheric chemical reactions	• Reduced lung function, especially in children • Aggravation of respiratory and cardiorespiratory diseases • Increased cough and chest discomfort • Reduced visibility
Toxic Air Contaminants (TACs)	Cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; building materials and products	• Cancer • Chronic eye, lung, or skin irritation • Neurological and reproductive disorders

High O_3 levels are caused by the cumulative emissions of reactive organic gases (ROG) and NO_x. These precursor pollutants react under certain meteorological conditions to form high O_3 levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce O_3 levels. The highest O_3 levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources.

[7] The area has attained both state and federal ambient air quality standards for CO. The project does not include substantial new emissions of sulfur dioxide or lead. These criteria pollutants are not discussed further.

PM is a problematic air pollutant of the Bay Area. PM is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM_{10}) and fine particulate matter where particles have a diameter of 2.5 micrometers or less ($PM_{2.5}$). Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide emissions and localized emissions.

Toxic Air Contaminants

TACs are a broad class of compounds known to have health effects. They include but are not limited to criteria pollutants. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway).

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (most susceptible to injury).[8] Chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the California Air Resources Board (CARB).

Sensitive Receptors

Some groups of people are more affected by air pollution than others. CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

3.3.1.2 *Regulatory Framework*

Federal and State

Clean Air Act

At the federal level, the United States Environmental Protection Agency (EPA) is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants (discussed previously), including PM, O_3, CO, SO_x, NO_x, and lead.

CARB is the state agency that regulates mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act. The EPA and the CARB have adopted ambient air quality standards establishing permissible levels of these pollutants to protect public health and the climate. Violations of ambient air quality

[8] California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed April 29, 2022. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

standards are based on air pollutant monitoring data and are determined for each air pollutant. Attainment status for a pollutant means that a given air district meets the standard set by the EPA and/or CARB.

Risk Reduction Plan

To address the issue of diesel emissions in the state, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. In addition to requiring more stringent emission standards for new on-road and off-road mobile sources and stationary diesel-fueled engines to reduce particulate matter emissions by 90 percent, the plan involves application of emission control strategies to existing diesel vehicles and equipment to reduce DPM (in additional to other pollutants). Implementation of this plan, in conjunction with stringent federal and CARB-adopted emission limits for diesel fueled vehicles and equipment (including off-road equipment), will significantly reduce emissions of DPM and NO_X.

Regional and Local

2017 Clean Air Plan

The Bay Area Air Quality Management District (BAAQMD) is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area. Regional air quality management districts, such as BAAQMD, must prepare air quality plans specifying how state and federal air quality standards will be met. BAAQMD's most recently adopted plan is the Bay Area 2017 Clean Air Plan (2017 CAP). The 2017 CAP focuses on two related BAAQMD goals: protecting public health and protecting the climate. To protect public health, the 2017 CAP describes how BAAQMD will continue its progress toward attaining state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the 2017 CAP includes control measures designed to reduce emissions of methane and other super-greenhouse gases (GHGs) that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.[9]

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. Jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by BAAQMD within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

Santa Rosa General Plan 2035

The following General Plan goal and policy pertaining to air quality are applicable to the project:

[9] BAAQMD. *Final 2017 Clean Air Plan.* April 19, 2017. http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans.

Goal/Policy	Description
Goal OSC-J	Take appropriate actions to help Santa Rosa and the larger Bay Area region achieve and maintain all ambient air quality standards.
Policy 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.

3.3.1.3 *Existing Conditions*

The Bay Area is considered a non-attainment area for ground-level O_3 and $PM_{2.5}$ under both the federal Clean Air Act and state Clean Air Act. The area is also considered nonattainment for PM_{10} under the state act, but not the federal act. The area has attained both state and federal ambient air quality standards for CO. As part of an effort to attain and maintain ambient air quality standards for O_3 and PM_{10}, BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for O_3 precursor pollutants (ROG and NO_X), PM_{10}, and $PM_{2.5}$, and apply to both construction period and operational period impacts.

The nearest sensitive receptors to the project site are the Roseland Creek Elementary School, located directly west of the site across Burbank Avenue, and the single-family residences located adjacent to the site boundaries on the north, east and south sides. Additionally, there are single-family residences northwest of the site, located diagonally across Burbank Avenue from the site, and single-family and multiple-family residences located to the east of the site across McMinn Avenue.

3.3.2 Impact Discussion

For the purpose of determining the significance of the project's impact on air quality, would the project:

1) Conflict with or obstruct implementation of the applicable air quality plan?
2) 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?
3) Expose sensitive receptors to substantial pollutant concentrations?
4) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Note: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the determinations.

3.3.2.1 *Thresholds of Significance*

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based to the extent possible on scientific and factual data. The City of Santa Rosa has considered the air quality thresholds updated by BAAQMD in May 2017 and regards these

thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and $PM_{2.5}$. The BAAQMD CEQA Air Quality thresholds used in this analysis are identified in Table 3.3-2 below.

Table 3.3-2: BAAQMD Air Quality Significance Thresholds			
Pollutant	**Construction Thresholds**	**Operation Thresholds**	
	Average Daily Emissions (pounds/day)	**Average Daily Emissions (pounds/day)**	**Annual Average Emissions (tons/year)**
Criteria Air Pollutants			
ROG, NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	
Health Risks and Hazards for New Sources (within a 1,000-foot Zone of Influence)			
Health Hazard	**Single Source**	**Combined Cumulative Sources**	
Excess Cancer Risk	10 per one million	100 per one million	
Hazard Index	1.0	10.0	
Incremental Annual $PM_{2.5}$	0.3 µg/m^3	0.8 µg/m^3 (average)	

3.3.2.2 *Project Impacts*

Impact AIR-1: The project would not conflict with or obstruct implementation of the applicable air quality plan**. (Less than Significant Impact)**

Clean Air Plan

The consistency of the project is evaluated with respect to each set of applicable control measures included in the 2017 CAP as shown in Table 3.3-3.

Table 3.3-3: Bay Area 2017 Clean Air Plan Applicable Control Measures		
Control Measures	**Description**	**Project Consistency**
Transportation Measures		
Bicycle and Pedestrian Access and Facilities	Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund	The project would include the provision of trails that would facilitate bicycle and pedestrian travel throughout the site, and

	bike lanes, routes, paths and bicycle parking facilities.	provide connectivity to adjacent streets.
Building Measures		
Urban Heat Island M	Develop and urge adoption of a model ordinance for "cool parking" that promotes the use of cool surface treatments for new parking facilities, as well existing surface lots undergoing resurfacing. Develop and promote adoption of model building code requirements for new construction or reroofing/ roofing upgrades for commercial and residential multifamily housing.	The project would be required to comply with the City's Green Building Ordinance and the most recent California Building Code which would increase building efficiency over standard construction. Therefore, the project is consistent with this control measure.
Natural and Working Lands Measures		
Urban Tree Planting	Develop or identify an existing model municipal tree planting ordinance and encourage local governments to adopt such an ordinance. Include tree planting recommendations, the Air District's technical guidance, best management practices for local plans, and CEQA review.	The project would be required to adhere to the City's tree replacement policy. Therefore, the project is consistent with this control measure.

The project includes transportation, building, and natural and working lands measures consistent with the 2017 CAP. The project is also consistent with the City's General Plan. The project, by itself would not result in a significant impact related to consistency with the Bay Area 2017 CAP. **(Less Than Significant Impact)**

Regional Criteria Pollutant Emissions

Operational Criteria Pollutants

According to the BAAQMD thresholds listed in Table 3.3-2, a project that generates more than 54 pounds per day of ROG (reactive organic gases), NO_x, or $PM_{2.5}$; or 82 pounds per day of PM_{10} would be considered to have a significant impact on regional air quality. BAAQMD developed screening criteria that provide Lead Agencies with a conservative indication of whether a proposed project could result in a significant operational impact (e.g., daily or annual emissions above these thresholds). Operational emissions associated with the project would primarily consist of passenger vehicles traveling to and from the project site. As discussed in Section 3.17 Transportation, the project would generate approximately 230 net new vehicle trips traveling to and from the project site. The proposed project would construct active park uses on approximately 4.59 acres of the site, which is well below the most stringent screening criteria of 2,613 acres of City park for operational impacts.[10] The BAAQMD screening criteria account for vehicle emissions and thus, the operational emissions from project-generated vehicle trips would not be a substantial new source of criteria pollutants. Based on the BAAQMD screening tables, the project would not result in a significant

[10] Bay Area Air Quality Management District. CEQA Air Quality Guidelines. Table 3-1, Operational-Related Criteria Air Pollutant and Precursor Screening Level Sizes. Updated May 2017. p. 3-2.

impact to regional air quality in the San Francisco Bay Area Air Basin due to operational criteria pollutant emissions. **(Less Than Significant Impact)**

Construction Criteria Pollutants

The BAAQMD screening criteria size for construction impacts from criteria pollutants is 67 acres for a city park. Projects that are smaller than the screening size are considered to have a less than significant construction air quality impact. The proposed 19.49-acre project site is well below the screening size for the proposed land use. Therefore, the project would have a less than significant construction air quality impact from criteria pollutant emissions. **(Less than Significant Impact)**

Impact AIR-2:	The project would not 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. **(Less than Significant Impact)**

As discussed under Impact AIR-1, the project falls below the BAAQMD screening criteria for operational impacts from parks. The project would have emissions below the BAAQMD thresholds for ozone precursors and particulate matter. Therefore, the project would not contribute substantially to existing or projected violations of those standards. **(Less Than Significant Impact)**

Impact AIR-3:	The project would not expose sensitive receptors to substantial pollutant concentrations. **(Less than Significant Impact)**

Construction activities on the site includes minimal grading, which would generate dust and other particulate matter. The generation of dust and other particulate matter could temporarily impact children at the nearby Roseland Creek Elementary School, as well as residents of the adjacent residential properties.

Standard Measures: The City would implement the following best management practices as recommend by BAAQMD for all projects during construction to reduce dust impacts:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics

control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

The dust control/exhaust measures listed for construction impacts would ensure that the construction of the proposed park would emit less exhaust emissions (including diesel) and fugitive dust emissions and would result in a less than significant construction-related air quality impact on nearby residents. **(Less than Significant Impact)**

Impact AIR-4:	The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. **(Less than Significant Impact)**

The proposed development is a community park consisting of open space and passive recreational uses and would not result in incompatible odors. While construction of the development would result in temporary exhaust emissions, it would not result in a significant odor impact. **(Less than Significant Impact)**

3.3.2.3 *Cumulative Impacts*

Impact AIR-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant air quality impact. **(Less than Significant Cumulative Impact)**

As discussed above, the proposed project, by itself, would not result in any air pollutant emissions exceeding the BAAQMD's significance thresholds. Given that the proposed project falls below the BAAQMD screening thresholds, that were developed to identify both project and cumulative air quality impacts, it would not be considered to have a substantial contribution to any potential air quality impact in combination with the projects listed in Table 3.0-1. Additionally, the cumulative projects listed in Table 3.0-1 would also be subject to the standard measures listed under Impact AIR-3. Mitigation measures required of the cumulative projects for consistency with the Roseland Area/Sebastopol Road Specific Plan EIR would ensure their construction and operational air quality impacts are less than significant. Therefore, the project would not result in a cumulatively considerable contribution to a cumulatively significant air quality impact. **(Less than Significant Cumulative Impact)**

3.4 BIOLOGICAL RESOURCES

The following discussion is based, in part, on reports prepared by WRA Environmental Consultants (WRA) including a biological resources assessment (February 2024) and a tree survey report (October 2019). Copies of these reports are included in Appendix B and Appendix C of this EIR, respectively.

3.4.1 Environmental Setting

3.4.1.1 *Regulatory Framework*

Federal and State

Endangered Species Act

Individual plant and animal species listed as rare, threatened, or endangered under state and federal Endangered Species Acts are considered special-status species. Federal and state endangered species legislation has provided the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) with a mechanism for conserving and protecting plant and animal species of limited distribution and/or low or declining populations. Permits may be required from both the USFWS and CDFW if activities associated with a proposed project would result in the take of a species listed as threatened or endangered. To "take" a listed species, as defined by the State of California, is "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" these species. Take is more broadly defined by the federal Endangered Species Act to include harm of a listed species.

In addition to species listed under state and federal Endangered Species Acts, Sections 15380(b) and (c) of the CEQA Guidelines provide that all potential rare or sensitive species, or habitats capable of supporting rare species, must be considered as part of the environmental review process. These may include plant species listed by the California Native Plant Society and CDFW-listed Species of Special Concern.

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. This includes direct and indirect acts, except for harassment and habitat modification, which are not included unless they result in direct loss of birds, nests, or eggs. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

Sensitive Habitat Regulations

Wetland and riparian habitats are considered sensitive habitats under CEQA. They are also afforded protection under applicable federal, state, and local regulations, and are generally subject to regulation by the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), CDFW, and/or the USFWS under provisions of the federal Clean Water Act (e.g., Sections 303, 304, 404) and State of California Porter-Cologne Water Quality Control Act.

Waters of the United States

The U.S. Army Corps of Engineers (Corps) regulates "Waters of the United States" under Section 404 of the Clean Water Act. Waters of the U.S. are defined in the Code of Federal Regulations (CFR) as waters susceptible to use in commerce, including interstate waters and wetlands, all other waters (intrastate waterbodies, including wetlands), and their tributaries (33 CFR 328.3). Potential wetland areas, according to the three criteria used to delineate wetlands as defined in the *Corps of Engineers Wetlands Delineation Manual* (Environmental Laboratory 1987), are identified by the presence of (1) hydrophytic vegetation, (2) hydric soils, and (3) wetland hydrology. Areas that are inundated at a sufficient depth and for a sufficient duration to exclude growth of hydrophytic vegetation are subject to Section 404 jurisdiction as "other waters" or "nonwetland waters" and are often characterized by an ordinary high water mark (OHWM). Other waters or non-wetland waters, for example, generally include lakes, rivers, and streams. The placement of fill material into Waters of the U.S generally requires an individual or nationwide permit from the Corps under Section 404 of the Clean Water Act.

Waters of the State

The term "Waters of the State" is defined by the Porter-Cologne Act as "any surface water or groundwater, including saline waters, within the boundaries of the state." The Regional Water Quality Control Board (RWQCB) protects all waters in its regulatory scope and has special responsibility for wetlands, riparian areas, and headwaters. These waterbodies have high resource value, are vulnerable to filling, and are not systematically protected by other programs. RWQCB jurisdiction includes "isolated" wetlands and waters that may not be regulated by the Corps under Section 404. Waters of the State are regulated by the RWQCB under the State Water Quality Certification Program which regulates discharges of fill and dredged material under Section 401 of the Clean Water Act and the Porter-Cologne Water Quality Control Act. Projects that require a Corps permit, or fall under other federal jurisdiction, and have the potential to impact Waters of the State, are required to comply with the terms of the Water Quality Certification determination. If a proposed project does not require a federal permit, but does involve dredge or fill activities that may result in a discharge to Waters of the State, the RWQCB has the option to regulate the dredge and fill activities under its state authority in the form of Waste Discharge Requirements.

Fish and Game Code Section 1602

Streambeds and banks, as well as associated riparian habitat, are regulated by the CDFW per Section 1602 of the Fish and Game Code. Work within the bed or banks of a stream or the adjacent riparian habitat requires a Streambed Alteration Agreement from the CDFW.

Regional and Local

Santa Rosa Plain Conservation Strategy

The Santa Rosa Plain Conservation Strategy Area is an area established by the USFWS for the protection and continued existence of California tiger salamander (CTS, *Ambystoma californiense*) and three endangered plant species: Burke's goldfields (*Lasthenia burkei*), Sonoma sunshine (*Blennosperma bakeri*), and Sebastopol meadowfoam (*Limnanthes vinculans*). The Conservation

Strategy (USFWS 2005) outlines the specific species of concern for this area along with guidance for specific conservation measures. In 2007 the Corps consulted with the USFWS on Section 404 permitting within the Conservation Strategy area which resulted in a Programmatic Biological Opinion (PBO). In 2020, the PBO was revised. The 2020 PBO outlines the mitigation requirements resulting from impacts to wetlands and associated impacts to CTS and the three listed plants, and can be appended to permits authorized by the Corps. When appended, it is the PBO that dictates the mitigation requirements for CTS and the three listed plant species.

City of Santa Rosa Tree Ordinance

The City of Santa Rosa recognizes the aesthetic, environmental, and economic benefits mature trees provide to the citizens of the City. Chapter 17-24, "Trees" of the Santa Rosa City Code (Tree Ordinance) regulates the protection of certain trees on public and private properties within the City limits. The Tree Ordinance defines a "heritage tree" as: valley oak (*Quercus lobata*), blue oak (*Q. douglasii*), or buckeye (*Aesculus californica*) 19 inches circumference at breast height (measured at 4.5 feet above ground; or six inches diameter at breast height [DBH]) or greater; madrone (*Arbutus menziesii*) 38 inches circumference (12 inches DBH) or greater; coast live oak (*Q. agrifolia*), black oak (*Q. kelloggii*), Oregon oak (*Q. garryana*), canyon live oak (*Q. chrysolepis*), interior live oak (*Q. wislizenii*), red alder (*Alnus rubra* [*A. oregona*]), or white alder (*A. rhombifolia*) 57 inches circumference (18 inches DBH) or greater; or redwood (*Sequoia sempervirens*), bay (*Umbellularia californica*), Douglas fir (*Pseudotsuga menziesii*), or big-leaf maple (*Acer macrophyllum*) 75 inches circumference (24 inches DBH) or greater.

A Tree Permit is generally required for the removal, alteration or relocation of any "heritage tree", "protected tree" (i.e. any tree, including a heritage tree, designated to be preserved on an approved development plan or as a condition of approval of a tentative map, a tentative parcel map, or other development approval issued by the City), or "street tree" (i.e. any tree having a single trunk circumference greater than 6.25 inches or a diameter greater than two inches, a height of more than six feet, and one half or more of its trunk is within a public right of way or within five feet of the paved portion of a City street or a public sidewalk), except as exempted in Section 17-24.030 of the Tree Ordinance. Several non-native species including acacia, silver maple, ailanthus, hawthorn, fruitless mulberry, privet, pyracantha, Monterey pine, Monterey cypress, and fruit and nut trees (except walnut) are exempt from the provisions of the ordinance. Trees, other than heritage trees, situated within City owned parks and other City owned or controlled places when altered, removed, or relocated by City employees or by contractors retained by the City are also exempt.

Creekside Development Ordinance

Section 20-30.040 "Creekside Development", of the Santa Rosa City Code defines minimum setbacks from waterways for new structures to protect the public from the hazards of streambank failures and flooding. Under the ordinance, buildings of any type, driveways, streets, parking areas, patios, platforms, decks, fences, earth fill or other structural debris fill, and retaining walls, shall be setback a minimum of 50 feet from: (a) the top of the highest bank for streams with defined channels and banks with slopes gentler than 2.5:1; (b) the intersection of 2.5:1 slope from toe of bank with top-of-bank where the natural bank is steeper than 2.5:1; or (c) the 100-year storm freeboard level for streams where there is no defined top-of-bank. Bridges for motor vehicles, pedestrians, and/or

bicycles, and/or public utility infrastructure may cross through a waterway setback area and over or under its channel, provided that the installation has received all required approvals from the City.

Santa Rosa General Plan 2035

The following General Plan policies pertaining to biological resources are applicable to the project:

Policy	Description
OSC-D-1	Utilize existing regulations and procedures, including Subdivision Guidelines, Zoning, Design Review, and environmental law, to conserve wetlands and rare plants. Comply with the federal policy of no net loss of wetlands using mitigation measures such as: • Avoidance of sensitive habitat; • Clustered development; • Transfer of development rights; and/or • Compensatory mitigation, such as restoration or creation.
OSC-D-3	Preserve and restore the elements of wildlife habitats and corridors throughout the Planning Area.
OSC-D-4	Continue to consult with the California Department of Fish and Wildlife to identify significant environments. Identify priorities for acquisition or maintenance of open space areas based on biological and environmental concerns, and develop an overall strategy for the maintenance of areas that will preserve the populations of plants and animals currently found within the Urban Growth Boundary.
OSC-D-7	Rehabilitate existing channelized waterways, as feasible, to remove concrete linings and allow for a connection with the stream channel and the natural water table. Avoid creating additional channelized waterways, unless no other alternative is available to protect human health, safety, and welfare.
OSC-D-8	Restore channelized waterways to a more natural condition which allows for more natural hydraulic functioning, including development of meanders, pools, riffles, and other stream features. Restoration should also allow for growth of riparian vegetation which effectively stabilizes banks, screens pollutants from runoff entering the channel, enhances fisheries, and provides other opportunities for natural habitat restoration
OSC-D-9	Ensure that construction adjacent to creek channels is sensitive to the natural environment. Ensure that natural topography and vegetation is preserved along the creek, and that construction activities do not disrupt or pollute the waterway.
OSC-D-11	New development along channelized waterways should allow for an ecological buffer zone between the waterway and development. This buffer zone should also provide opportunities for multi-use trails and recreation.
OSC-D-12	New development should maintain an adequate setback from channelized waterways to recognize the 100-year flood elevation, and allow for stream corridor restoration. Setbacks identified in the Zoning Code should serve as minimum setbacks. Larger setbacks are encouraged in accordance with Restoration Concept Plans to meet restoration and enhancement goals
OSC-F	Construct trail corridors and other recreational opportunities along local waterways

Policy	Description
OSC-G	Provide educational opportunities along the waterways in the city.
OSC-H-1	Preserve trees and other vegetation, including wildflowers, both as individual specimens and as parts of larger plant communities.
OSC-H-2	Preserve and regenerate native oak trees.
OSC-H-5	Plant trees on public property including park strips, open space and park areas and encourage tree planting on private property to help offset carbon emissions.

3.4.1.2 *Existing Conditions*

The majority of the project site remains undeveloped and comprised of open non-native annual grassland, and valley oak (*Quercus lobata*) woodland. WRA biologists have conducted numerous site visits and surveys at the property throughout 2017 and 2018. Additional surveys were performed in spring 2022.

The project site is bisected by Roseland Creek, an intermittent United States Geological Survey (USGS) "blue-line" stream, which flows through the project site in a westerly direction. Historic aerial imagery indicates that nearly the entire project site, with the exception of the creek corridor, supported high density, intensive agricultural (orchard) production from at least 1942 to as recently as 1971. The existing conditions of the site generally reflect the previous disturbance regime, and existing oak woodlands on site, outside of the riparian corridor, consist of a naturalized even-aged stand of relatively young trees. Other old, dead and/or decadent Northern California black walnut (*Juglans hindsii*) trees on the northernmost parcel are further indicative of the site's agricultural past, as this species was typically used as rootstock for English walnut (*J. regia*) orchards. The two northernmost parcels are currently accessible and in use by the public, as evidenced by numerous social trails crossing the site, and numerous tire tracks and ruts observed during the site visit. Recent aerial imagery (Google Earth 2017) also indicate that the open grassland portions of the project site are likely mowed annually for fire suppression.

Seven biological communities were identified on the project site (refer to Figure 3.4-1). Non-sensitive biological communities include non-native grassland, developed/landscaped areas, and disturbed valley oak woodland. Potentially sensitive biological communities observed on the project site include intermittent stream (Roseland Creek), valley oak riparian woodland, riparian wetland, and purple needlegrass grassland, all of which are detailed following Figure 3.4-1.

Source: WRA Environmental Consultants, 11/14/2022.

EXISTING BIOLOGICAL COMMUNITIES | FIGURE 3.4-1

Wetlands and Waters of the U.S.

Intermittent Stream

The project site contains approximately 0.35-acre of the intermittent stream which bisects the site flowing in a southwesterly direction. Roseland Creek is an intermittent USGS blue-line stream. The upper reach of the creek within the project site, where the creek enters the site, is approximately eight feet wide and has a concrete slab bed for approximately 400 linear feet, with water undermining and flowing underneath the concrete at the time of the site visit. The lower reach (western portion) of the stream has a more natural channel composed of rock and cobble mixed with sands and silts. Roseland Creek was delineated within the project site based on observable Ordinary High-Water Mark (OHWM) indicators including: presence of a bed and bank, scouring, wrack, sediment deposition, and water stains on the banks. The lower reach of the creek contains a backflow channel which supports a riparian wetland, described in detail below. Dominant vegetation along the banks of the intermittent stream is composed of valley oak riparian woodland (described below). The channel had flowing water in it during the May 2017 site visit. Areas mapped as intermittent creek are considered jurisdictional under Section 404 of the CWA and Section 1602 of the CFGC. Roseland Creek is also generally subject to development setbacks for structures (including buildings of any type, driveways, streets, parking areas, patios, platforms, decks, fences, earth fill or other structural debris fill, or retaining walls) of 50 feet from the top of bank, as per Section 20-30.040 “Creekside Development”, of the Santa Rosa City Code. Bridges for motor vehicles, pedestrians, and/or bicycles, and/or public utility infrastructure may cross through a waterway setback area and over or under its channel, provided that the installation has received all required approvals from the City. In accordance with Zoning Code Section 20-10.050(G), the Zoning Code shall not apply to any public project of the City except to the minimum extent required by law.

Riparian Wetland

The project site contains approximately 0.10 acre of riparian wetland directly adjacent to Roseland Creek. The riparian wetland is located in the downstream portion of Roseland Creek, adjacent to Burbank Avenue where the stream flows off of the site through a box culvert underneath Burbank Avenue. The culvert appears to be functioning as a sediment trap which backs up stream flows enough to cause wetland conditions below the OHWM, in-line with the stream. Standing water and wetland vegetation were also observed in an approximately nine-foot-wide backflow scour channel on the north side of the main creek channel. The riparian wetland within the project site contained standing water to a depth of two inches or greater during the time of the site visit, and was dominated by wetland vegetation including northern water plantain (*Alisma triviale*), Santa Barbara sedge (*Carex barbarae*), curly dock (*Rumex crispus*), California blackberry (*Rubus ursinus*), and Oregon ash (*Fraxinus latifolia*). Areas mapped as riparian wetland are considered jurisdictional under Section 404 of the CWA. In addition, due to its position adjacent to or in-line with the intermittent stream, the riparian wetland is likely to be considered jurisdictional under Section 1602 of the CFGC, as riparian habitat.

Other Sensitive Biological Communities

Valley Oak Riparian Woodland

Valley oak riparian woodland occupies approximately 1.96 acres of the project site. Valley oak riparian woodland forms a contiguous canopy along the banks of Roseland Creek. This community

was mapped as having valley oak greater than 30 percent relative cover in the tree canopy with other tree species present. The overstory is dominated by large, mature valley oak trees, with a middlestory composed of various native trees tolerant of winter flooding and/or a high-water table, including valley oak, arroyo willow (*Salix lasiolepis*), and Oregon ash. The understory is dominated by woody vine/shrub species including non-native invasive Himalayan blackberry (*Rubus armeniacus*), with other native species present including poison oak (*Toxicodendron diversilobum*), and snowberry (*Symphoricarpos albus*). Understory herbs are scarce, and mostly restricted to steep banks, and the stream edge. Valley oak woodland is reported by the CDFW with a rarity ranking of G3, S3 (CNPS 2017), indicating that it is considered vulnerable globally and in California. This community would therefore be considered sensitive and must be evaluated under CEQA (CCR Title 14, Div. 6, Chap. 3). Valley oak riparian woodland is also considered a sensitive community under Section 1602 of the CFGC, and this community also contains many individual trees protected per the City of Santa Rosa Tree Ordinance. Any tree removal deemed necessary for construction will require a tree removal permit from the City of Santa Rosa. Any development within this community, including but not limited to trail construction will require a CDFW permit.

Purple Needlegrass Grassland

Purple needlegrass grassland occupies approximately 0.45 acre in the southeastern portion of the project site. This community was mapped within the project site as containing purple needle grass (*Stipa [Nassella] pulchra*) greater than ten percent relative cover of the herbaceous layer. Within the project site, this community is dominated by purple needlegrass at approximately 45 percent relative cover with other predominantly non-native grasses and forbs including slim oat (*Avena barbata*), spring vetch (Vicia sativa), hairy cat's ear (*Hypochaeris radicata*), rose clover (*Trifolium hirtum*), and Spanish lotus (*Acmispon americanus var. americanus*). Purple needlegrass grassland is reported by the CDFW with a rarity ranking of G4, S3 (CDFW 2017), indicating that it is apparently secure globally, but vulnerable in California. Although, the purple needlegrass community is relatively disturbed, likely mowed annually or semi-annually, and contains a low diversity of associated native forbs, this community could potentially be considered sensitive under CEQA, due to its sensitivity ranking.

Non-Sensitive Biological Communities

Developed/Landscaped

Developed/landscaped areas occupy approximately 3.09 acres within the project site. These areas have been previously developed and contained occupied or abandoned residences with associated hardscape, gravel driveways, and landscapes including ornamental trees and shrubs including Mexican fan palm (*Washingtonia robusta*), blue gum (*Eucalyptus globulus*), apple (*Malus sp*.), rose (*Rosa sp*.), and lilac (*Syringa sp*.). Developed/landscaped areas are not considered sensitive. However, they may contain protected trees per the City of Santa Rosa Tree Ordinance.

Non-Native Grassland

Non-native grassland occupies approximately 6.47 acres within the project site. Non-native grasslands within the project site are dominated by non-native annual grasses including slim oat, Italian ryegrass, and soft chess (*Bromus hordeaceus*), with associated grasses and forbs including Harding grass (*Phalaris aquatica*), bristly ox-tongue (*Helminthotheca echioides*), spring vetch, and

carrot (*Daucus carota*). Occasional areas of semi-mesic grasslands which included Italian ryegrass, and Mediterranean barley (*Hordeum marinum* ssp. *gussoneanum*), were investigated for potential jurisdictional wetland status, and although some features contained marginal wetland criteria (i.e., met one or more of three parameters: hydrology, hydrophytic vegetation, and hydric soils) during the 2017 site visit, which occurred during a substantially above-normal rainfall year, these features do not meet wetland criteria under normal precipitation conditions, as determined in 2018, and reconfirmed in 2022. This community contains scattered trees including several over-mature, declining Northern California black walnut trees, which are likely remnant rootstock from the historic orchard which occupied the area. Black walnut trees used in agriculture are typically hybrid species that have the potential to become invasive and threatening to the native Northern California black walnut. Therefore, the stands of hybrid origin walnut trees from resprouting orchard rootstock are not considered sensitive resources. Additionally, the walnut trees make up less than 10 percent absolute cover and thus, are not considered a separate community but are included within the non-native grassland. Non-native grasslands appear to be mowed annually or semi-annually, and other human-caused disturbance, including off-road vehicle use, and social trails were observed. This community is not considered sensitive. However, these areas may contain protected trees per the City of Santa Rosa Tree Ordinance.

Disturbed Valley Oak Woodland

Disturbed valley oak woodland occupies approximately 7.07 acres within the project site. This community was characterized as disturbed valley oak woodland, due to historic and contemporary disturbance within the community. Historic aerials indicate that all areas mapped as disturbed valley oak woodland were occupied by high-density orchards as recently as 1971. This historic disturbance is evident, in particular in the northern portion of the stand, north of Roseland Creek, where the community is composed of an even-aged stand of young valley oak trees, which have the appearance of a planted or naturalized stand. Current disturbance observed within this community included numerous social trails, and off-road vehicle use, as evidenced by numerous tire tracks and ruts. Vegetation within this community is dominated by valley oak, with an understory dominated by non-native grasses including rattlesnake grass (*Briza maxima*), Italian ryegrass, and soft chess. Woody vines including poison oak and Himalayan blackberry are also abundant within the understory. This community is not considered sensitive due to the historic and contemporary disturbance levels. However, the majority of trees within this community are considered protected per the City of Santa Rosa Tree Ordinance.

Special-Status Plant Species

Ninety-three special-status plant species have been documented within the vicinity of the project site. Of the 93 special-status species documented, two were initially determined to have a moderate potential to occur on the project site, and are described in Table 3.4-1, below. The remaining 91 special-status plant species are either unlikely or have no potential to occur within the project site for one or more of the following reasons:

- The project site has been repeatedly and intensively altered from a natural state, by development, agricultural conversion, discing, or mowing, thereby eliminating the seedbank or diminishing establishment of the special-status plant(s);

- The project site does not contain hydrologic conditions (e.g., perennial saline, freshwater marshes and swamps) necessary to support the special-status plant(s);
- The project site does not contain edaphic (soil) conditions (e.g., serpentine or volcanic substrate) necessary to support the special-status plant(s);
- The project site does not contain vegetation communities (e.g., chaparral, coastal scrub, vernal pools) associated with the special-status plant(s);
- Very unique pH characteristics, such as alkali wetlands are absent from the project site;
- Competition from vigorous non-native invasive species (e.g. non-native annual grasses), likely precludes the special-status species' ability to persist on-site;
- This special-status species was not observed during the site visit which was conducted during the bloom period of the species.

Table 3.4-1: Special-Status Plant Species with the Potential to Occur on the Project Site

Species	Habitat Requirements	Potential to Occur
Sonoma alopecurus (*Alopecurus aequalis var. sonomensis*)	Marshes and swamps (freshwater), riparian scrub. Elevation ranges from 20 to 1,200 feet. Blooms May-July	**Not Observed (originally assessed: Moderate Potential)**. The project site contains potentially suitable riparian habitat which could support this species. However, this species was not observed during a protocol-level survey conducted during the species' bloom period in 2017, 2018, and 2022.
Congested-headed hayfield tarplant (*Hemizonia congesta ssp. Congesta*)	Chaparral, cismontane woodland/volcanic, rocky. Elevation ranges from 390 to 2,100 feet. Blooms April-Nov.	**Not Observed (originally assessed: Moderate Potential)**. The project site contains potentially suitable grassland habitat that may support this species. This species is relatively disturbance-tolerant and may not be precluded by historic and current disturbance regime in the project site. However, this species was not observed during a protocol-level survey conducted during the species' bloom period in 2017, 2018, and 2022.

All listed plant species covered by the Santa Rosa Plain Programmatic Biological Opinion (PBO) Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam, are unlikely to occur within the project site due to a lack of vernal pool habitat, lack of suitable hydrology (i.e., extended ponding), and/or prior disturbance (i.e., agricultural conversion, annual mowing). Moreover, Burke's

goldfields, and Sebastopol meadowfoam were not observed during the 2017 site visit which was conducted during their documented bloom period. Both species were observed in bloom at a documented reference site just five days after the site visit, confirming their phenology would have been identifiable during the time of the site visit. However, as a conservative measure, due to the presence of semi-mesic grassland and valley oak woodland observed during the 2017 site visit, protocol-level surveys for these species were conducted in 2018. An additional rare plant survey was completed in May 2022. No special-status plant species were identified during the surveys, and special-status plant species are presumed absent.

Special-Status Wildlife Species

A total of 37 special-status wildlife species are known in the vicinity based upon review of the resources and databases. Of these wildlife species, 13 have moderate or high potential to occur within the project site. Special-status wildlife species with potential to occur include seven species of bat, five species of birds, and northwestern pond turtle (NPT). These species may be affected both directly and indirectly by project activities if present. There is no suitable habitat for the California Giant Salamander or California red-legged frog on-site.

California Tiger Salamander

While surrounded on three sides by urbanized areas, the project site and neighboring properties to the south are mapped within the "Core Area" for CTS by the USFWS (2016), albeit at the periphery of this area. However, several factors indicate that the species is unlikely overall to occur within the project site. During WRA site visits spanning 2017 to 2022, small mammal burrows, the typical subterranean refugia for CTS, were not observed. The nearest documented CTS occurrence in CNDDB is located approximately 0.6-mile to the south of the site, south of Hearn Avenue; this occurrence involved an adult CTS that was found along the road in 2003 (CDFW 2022). The nearest documented breeding occurrence/habitat is located approximately 0.7-mile to the southwest (CDFW 2022), though this site has become isolated by urban development. The next-nearest breeding occurrence is at Southwest Community Park approximately 0.75-mile to the south of the site, south of Hearn Avenue (CDFW 2022). As per Trenham and Cook (2008), Hearn Avenue and directly associated infrastructure (e.g., storm drains) provides a barrier to CTS movement.

The project site does not provide any wetlands or seasonal aquatic features suitable for CTS breeding, and as such the persistence of a population there and on adjacent properties north of Hearn Avenue is highly unlikely. As such, CTS is considered unlikely to occur within the project site. Additionally, WRA site visits spanning 2017 to 2022 did not detect mammal burrows on-site, which are the most important upland refugia for CTS on the Santa Rosa Plain. Some areas contain expansion cracks that may serve as temporary refugia for CTS, but without other forms of refugia, CTS would not persist on the site because these cracks open and close based on saturation level. Leaf litter may provide temporary refugia during the wet season.

The project site is, however, within designated critical habitat which applies regardless of habitat conditions and on-site presence/absence of the species unless USFWS removes the designation for this area. However, the USFWS published guidance for interpretation of critical habitat in and around the urbanized centers of Santa Rosa, Bennett Valley, Rohnert Park, and Cotati, and in a final rule (Federal Register, Vol. 76, No. 169, 2011), the USFWS removed designation of critical habitat

for urban centers, and isolated, remnant habitat areas surrounded by heavily urbanized areas. The project site is most accurately classified as a partially developed remnant natural habitat area surrounded by a matrix of urban development. Urban development directly adjacent to the project site has expanded since the publication of the critical habitat designation through the development of Roseland Creek Elementary School, located across Burbank Avenue to the east. The 2011 USFWS final rule on critical habitat indicates that the project site should not be considered critical habitat.

Birds

The diversity of vegetation within the project site provides a variety of suitable conditions for nesting and foraging by both special-status and non-special-status birds. Vegetation communities including non-native grassland, purple needlegrass grassland, and valley oak woodland may provide suitable habitat to support nesting birds. Table 3.4-2 identifies special-status birds which have been documented in the area and have a moderate to high potential to nest within the project site.

Table 3.4-2: Special-Status Birds with Moderate or High Potential to Nest on the Project Site

Scientific Name	Common Name	Protection Status
Selasphorus sasin	Allen's hummingbird	USFWS Bird of Conservation Concern
Picoides nuttallii	Nuttall's woodpecker	USFWS Bird of Conservation Concern
Elanus leucurus	White-tailed kite	California Fully Protected Species
Icteria virens	Yellow-breasted chat	CDFW Species of Special Concern
Baeolophus inornatus	Oak titmouse	USFWS Bird of Conservation Concern

In addition to the special-status bird species noted above, non-status nesting birds are protected under the Migratory Bird Treaty Act (MBTA) and by the CFGC. Birds may nest in trees, brush, shrubs and grasslands within or adjacent to the project site. Nesting birds may be directly or indirectly affected by activities within the project site.

Bats

Seven special-status bat species also have a moderate potential to occur within the oak woodland, intermittent stream habitat, and abandoned structures (footbridge) within the project site. Table 3.4-3 outlines the species with potential to occur on the project site as well as their protection status with the Western Bat Working Group (WBWG) and CDFW.

Table 3.4-3: Bat Species with Moderate Potential to Occur on the Project Site

Scientific Name	Common Name	Protection Status
Myotis thysanodes	fringed myotis	WBWG High Priority

Table 3.4-3: Bat Species with Moderate Potential to Occur on the Project Site		
Scientific Name	**Common Name**	**Protection Status**
Lasiurus cinereus	hoary bat	WBWG Medium Priority
Myotis volans	long-legged myotis	WBWG High Priority
Antrozous pallidus	pallid bat	CDFW Species of Special Concern, WBWG High Priority
Corynorhinus townsendii	Townsend's big-eared bat	CDFW Species of Special Concern, WBWG High Priority
Lasiurus blossevillii	western red bat	CDFW Species of Special Concern, WBWG High Priority
Myotis yumanensis	Yuma myotis	WBWG Low Priority

Herptiles

In addition to the bat and bird species, there is one special-status herptile species having a moderate potential to occur within the project site's riparian habitat. It is listed in Table 3.4-4, below.

Table 3.4-4: Herptile Species with Moderate Potential to Occur Within the Project Site		
Scientific Name	**Common Name**	**Protection Status**
Actinemys marmorata	Northwestern pond turtle	CDFW Species of Special Concern, Proposed Federal Threatened

Protected Trees

The project site contains numerous native trees that are large enough to be considered "heritage" trees per Chapter 17-24, "Trees" of the Santa Rosa City Code (Tree Ordinance). Trees, other than heritage trees, situated within City-owned parks and other City-owned or controlled places when altered, removed, or relocated by City employees or by contractors retained by the City are also exempt. The Tree Ordinance defines a "heritage tree" as:

- Valley oak (*Quercus lobata*), blue oak (*Q. douglasii*), or buckeye (*Aesculus californica*) 19 inches circumference at breast height (measured at 4.5 feet above ground; equal to 6 inches diameter at breast height [DBH]) or greater;
- Pacific madrone (*Arbutus menziesii*) 38 inches circumference (12 inches DBH) or greater;
- Coast live oak (*Quercus agrifolia*), black oak (*Q. kelloggii*), Oregon oak (*Q. garryana*), canyon live oak (*Q. chrysolepis*), interior live oak (*Q. wislizenii*), red alder (*Alnus rubra* [*A. oregona*]), or white alder (*A. rhombifolia*) 57 inches circumference (18 inches DBH) or greater; or
- Coast redwood (*Sequoia sempervirens*), California bay (*Umbellularia californica*), Douglas fir (*Pseudotsuga menziesii*), or big-leaf maple (*Acer macrophyllum*) 75 inches circumference (24 inches DBH) or greater.

WRA's ISA-Certified Arborist conducted a preliminary assessment of trees within the project site during their biological reconnaissance and determined that the majority of trees within the valley oak riparian woodland, and disturbed valley oak woodland habitats are large enough to be considered heritage trees per the Tree Ordinance. In addition, developed/landscaped areas, and non-native grasslands contain scattered native trees which are large enough to be considered heritage trees.

In July 2018, WRA conducted a focused heritage tree survey that concentrated on the trees located along the proposed pathway and active use areas of the site. The survey counted 355 heritage trees, including coast live oak, valley oak, redwood, and California buckeye, and ranging from six to 111 inches in trunk diameter. In addition to providing the sizes, the survey rated the health, structure and overall condition of the trees. The survey also identified which trees were potential candidates for removal, based on their locations with respect to the proposed trail alignments and park facilities. A copy of the tree survey is included in Appendix C of this EIR.

Santa Rosa Plain Conservation Strategy

The project site is located within the Santa Rosa Plain, an eco-region which supports habitat for many vernal pool-associated special-status species. The USFWS developed the Santa Rosa Plain Conservation Strategy as a conservation plan for these species. The Santa Rosa Plain Conservation Strategy Area is an area established by the USFWS for the protection and continued existence of California tiger salamander (CTS, *Ambystoma californiense*) and three endangered plant species: Burke's goldfields (*Lasthenia burkei*), Sonoma sunshine (*Blennosperma bakeri*), and Sebastopol meadowfoam (*Limnanthes vinculans*). The Conservation Strategy outlines the specific species of concern for this area along with guidance for specific conservation measures. In 2007 the Corps consulted with the USFWS on Section 404 permitting within the Conservation Strategy area which resulted in a Programmatic Biological Opinion (PBO). In 2020, the PBO was revised. The 2020 PBO outlines the mitigation requirements resulting from impacts to wetlands and associated impacts to CTS and the three listed plants, and can be appended to permits authorized by the Corps. It is the PBO that dictates the mitigation requirements for CTS and the three listed plant species.

3.4.2 Impact Discussion

For the purpose of determining the significance of the project's impact on biological resources, would the project:

1) 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 (CDFW) or United States Fish and Wildlife Service (USFWS)?
2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?
3) 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?

4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

3.4.2.1 *Project Impacts*

Impact BIO-1:	The project would not 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 CDFW or USFWS with implementation of mitigation. **(Less than Significant Impact with Mitigation Incorporated)**

Rare Plants

Ninety-three special-status plant species have been documented within the vicinity of the project site. Two special-status plant species, Sonoma alopecurus, and congested-headed hayfield tarplant, were initially determined to have a moderate potential to occur within the project site, due to the presence of suitable habitat, proximity to documented occurrences, and relative tolerance of the disturbance regime (in the case of congested-headed hayfield tarplant).

The project site does not contain suitable habitat for listed plant species covered by the Santa Rosa Plain PBO, Burke's goldfields, Sonoma sunshine, and Sebastopol meadowfoam, due to a lack of vernal pool and seasonal wetland habitat, lack of suitable hydrology (i.e., extended ponding), and prior disturbance (i.e., agricultural conversion, development, repeated mowing or discing). Although the project site does contain riparian wetland habitat, riparian wetlands within the site are characterized by perennial emergent marsh conditions which does not represent suitable habitat for these species. Moreover, Burke's goldfields, and Sebastopol meadowfoam were not observed during the site visit which was conducted during their documented bloom period. No further surveys are recommended for Santa Rosa Plain covered species.

Despite the lack of suitable habitat within the project site, protocol-level surveys for listed species were conducted by *WRA* as a conservative measure in March, April, and May 2018. The surveys did not encounter any special-status plants and these species are considered not present on the project site. A follow up site visit in May 2022 did not identify any special-status plants on the project site and, therefore, special-status plants are considered absent from the site. **(Less Than Significant Impact)**

Purple Needlegrass Grasslands

The project site contains a robust stand of native purple needlegrass grassland which is potentially considered sensitive under CEQA, and would require mitigation if significant impacts to these grasslands occur through project implementation. Purple needlegrass grasslands are mapped within the project site as containing purple needlegrass greater than approximately 45 percent relative cover

of the herbaceous layer. The project is designed to avoid impacts, however, by locating trails around the perimeter of the mapped purple needlegrass grasslands area, and providing interpretive signage adjacent to it. **(Less Than Significant Impact)**

Special-Status Bats

The project site contains trees that may provide roost structures for bats. Several special-status bat species occur in the area and have moderate potential to use trees on the site for day-roosting. The project is designed to retain nearly all trees on the site, but for those trees that will be impacted, measures to avoid potential impacts to bats would be implemented. Additionally, the small footbridge on site, may support day roosting bats. Planned demolition of the footbridge and tree removal could potentially impact bat species that may use them as a roost.

Impact BIO-1a: Demolition of the footbridge and tree removal on the project site could potentially impact special-status bat species that may use them as a roost, and could result in the direct removal, abandonment, or destruction of the maternity roost. **(Significant Impact)**

Mitigation Measures: Implementation of the following mitigation measures will reduce potential impacts to special-status bats to less than significant levels.

MM BIO-1a.1: A qualified biologist shall conduct a roost assessment survey of trees and structures located within the project site prior to removal. The survey will assess use of the features for roosting as well as potential presence of bats. If the biologist finds no evidence of, or potential to support bat roosting, no further measures are recommended as long as removal occurs within seven days of the survey. If evidence of bat roosting is present, additional measures described below shall be implemented:

- If evidence of bat roosting is discovered during the pre-construction roost assessment and demolition is planned August 1 through February 28 (outside the bat maternity roosting season), a qualified biologist should implement passive exclusion measures to prevent bats from re-entering the structures. After sufficient time to allow bats to escape and a follow-up survey to determine if bats have vacated the roost, demolition may continue and impacts to special-status bat species will be avoided. For tree removal that occurs during this time, trees should be felled in a two-step method as follows:
  - Remove limbs of trees first and leave them unprocessed on the site for at least 24 hours.
  - After the 24 hour period passes, the remainder of the tree can be felled and debris can be processed.
- If a pre-construction roost assessment discovers evidence of bat roosting in structures or trees during the maternity roosting season (March 1 through July 31), and determines maternity roosting bats are present, demolition of maternity roost structures will be avoided during the maternity roosting

season or until a qualified biologist determines the roost has been vacated. Any trees removed during this time shall follow the two-step method of removal described above.

Implementation of MM BIO-1a.1 would ensure that construction activities would not result in the take of bats that may roost on-site by either confirming that bats are not present or implementing avoidance measures to ensure that bats on-site are given adequate time to vacate their roosts prior to demolition activities that would impact potential roosting locations. **(Less Than Significant Impact with Mitigation Incorporated)**

Special-Status Herptiles

Northwestern Pond Turtle

Northwestern pond turtle (NPT) has a moderate potential to occur within the project site but is generally only associated with Roseland Creek and the riparian wetland habitat. If present, northwestern pond turtle would only occur within or directly adjacent to Roseland Creek. No in-water work is proposed within the project site's intermittent stream habitat (Roseland Creek). However, the project will incorporate measures intended to prevent and/or avoid impacts to special-status species, as described below, during work in or adjacent to the aquatic features they inhabit.

Impact BIO-1b: Construction activities associated with the project could potentially impact NPT adjacent to Roseland Creek. **(Significant Impact)**

Mitigation Measures: Implementation of the following mitigation measure will reduce potential impacts to NPT to less than significant levels.

MM BIO-1b.1: To avoid impacting NPT, a pre-construction survey shall determine if the species or its nests are present within work impact areas within 300 feet of Roseland Creek. The pre-construction survey shall be completed within 48 hours prior to commencement of work to locate any NPT nests or individual turtles. If no NPT are located, the work may proceed without further actions. If NPT or active NPT nests are found within the work area, they shall be avoided by 50 feet and be allowed to leave on their own accord. If NPT is in a work area that cannot be avoided and/or does not leave the area, CDFW shall be consulted to determine the procedure for relocation. Any active NPT nest shall be avoided by 15 feet and if it cannot be avoided, CDFW shall be consulted to determine next steps. If NPT is listed under the Federal endangered species act, and cannot be avoided, CDFW and USFWS shall be consulted to determine next steps, as no "take" can occur without USFWS authorization. **(Less Than Significant Impact with Mitigation Incorporated)**

Implementation of MM BIO-1b.1 would ensure that project construction activities would not result in the take of NPTs that may be present on site by either confirming that there are no NPTs present, avoiding NPTs and their nests, or relocating individuals in consultation with the CDFW and USFWS to avoid impacts to the species. **(Less Than Significant Impact with Mitigation Incorporated)**

California Tiger Salamander

As previously described, CTS is unlikely to occur on-site due to the lack of suitable wetland breeding habitat, lack of suitable upland dispersal and aestivation habitat (i.e., small mammal burrows), and significant barriers to dispersal between the project site and the nearest documented breeding occurrence of the species. The project site is within mapped designated critical habitat for CTS but conditions on the project site and surrounding environment prevent it from being essential to the conservation of the species and/or supporting it. Because no federal permit that would necessitate consultation with the USFWS is required for the project, mitigation for critical habitat is not required. The proposed project does not include activities that would impact CTS's ability to traverse the project site. Ecologically, the landscape will function the same with implementation of the project as it does now. By implementing work windows, risk to individual CTS would be reduced to discountable levels. However, because upland refugia can form overtime and as a conservative measure, the following mitigation measures shall be implemented to reduce the risk of impacts to CTS.

Impact BIO-1c: Construction activities associated with the project could potentially impact CTS occurring on the site and up to 1.37 acres of upland dispersal habitat. **(Significant Impact)**

Mitigation Measures: Implementation of the following mitigation measures will reduce potential impacts to CTS to less than significant levels.

MM BIO-1c.1: The project shall implement the following avoidance and mitigation measures contained in the Santa Rosa Plan Conservation Strategy:

- No ground disturbing activities shall be conducted during the wet season (October 15 through June 15) when CTS migrate to and from breeding habitats.
- The City or the project biologist shall consult the 72-hour weather forecast from the National Weather Service (NWS) prior to the start of ground disturbing activities. Ground disturbing activities shall not begin unless a no precipitation forecast is obtained and necessary erosion control measures are implemented.
- Prior to the commencement of ground disturbing activities, the site shall be inspected for burrows or other refugia that could support CTS. If none are detected, work can proceed without further measures. If burrows or other refugia with potential to support CTS are detected and cannot be avoided, the project shall consult with CDFW to determine if any additional measures, including an incidental take permit, may be required.
- To substantiate that no CTS are present and/or affected by the project, a qualified biological monitor will be present during initial ground disturbance. The biological monitor will conduct a training session for all construction workers before work is started on the project. If any CTS are encountered during ground disturbing activities, all work will stop and not commence until

authorization to commence work has been given by CDFW and USFWS. Such authorization may come in the form of take permits, if required.

- Access routes and number and size of staging and work areas will be limited to the minimum necessary.
- All foods and food-related trash items will be enclosed in sealed trash containers at the end of each day, and removed completely from the site once every three days.
- No pets will be allowed anywhere in the project site during construction.
- All equipment will be maintained such that there will be no leaks of automotive fluids such as gasoline, oils, or solvents.
- Hazardous materials such as fuels, oils, solvents, etc., will be stored in sealable containers in a designated location that is at least 200 feet from Roseland Creek. All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 200 feet from Roseland Creek.

MM BIO-1c.2: If it is determined that an incidental take permit is needed because a reasonable expectation of take has been found and cannot be avoided, mitigation for impacts to CTS may be determined to be necessary. In this case, CTS habitat that is permanently and adversely impacted by the project would be mitigated in accordance with the ratios described in the Santa Rosa Plain Conservation Strategy. The applicable ratio for mitigation in this area is one to one. This ratio would be applied to the net loss of suitable CTS habitat that results from the project. The square footage of developed areas on-site that would be removed (resulting in temporary impacts of approximately 1.88 acres), and restored to their natural state, may be used to offset novel impacts that result from the project. A maximum of 1.37 acres of permanent impacts are expected to result from the project, however, final mitigation ratio and acreage requirements shall be finalized in consultation with CDFW and/or the USFWS. Permanent loss of CTS habitat shall be mitigated at a one to one ratio.

With implementation of MM BIO-1c.1 and MM BIO-1c.2, the project would utilize avoidance measures to ensure that construction activities do not affect CTS that may be present on-site and the project would provide replacement habitat or compensatory mitigation for permanent impacts to CTS habitat in the event an incidental take permit is required. **(Less Than Significant Impact with Mitigation Incorporated)**

Impact BIO-2:	The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. **(Less than Significant Impact)**

The project site contains riparian wetland and intermittent stream which are likely to be considered jurisdictional waters of the U.S. All areas mapped as riparian wetland on the site are avoided by the proposed park improvements. However, the conceptual plan includes two pedestrian bridge crossings

across Roseland Creek. It appears that the western location of the proposed crossings contains an existing footbridge, though the eastern footbridge would be a new bridge. The project has been designed to avoid impacts to wetlands or areas below the OHWM and top of bank (TOB) of the creek.

The proposed bridge construction will avoid the OHWM of the creek, as well as potential riparian wetlands, so no formal wetland delineation or permits from the Corps would be required. All bridge improvements are planned to be constructed outside the top of bank of Roseland Creek and, therefore, would not require RWQCB permits. Although the final design of the bridges has not been completed to date, the removal of vegetation, particularly woody trees and shrubs within the valley oak riparian woodland will require a CDFW permit and require replacement mitigation at a three to one ratio. **(Less Than Significant Impact)**

Impact BIO-3:	The project would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. **(Less than Significant Impact)**

See response to Impact BIO-2, above.

Impact BIO-4:	The project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites with implementation of mitigation. **(Less than Significant Impact with Mitigation Incorporated)**

The project may involve the removal of trees and woody vegetation. Wildlife that would need to be protected if any trees are removed include birds and bats. The nesting season of birds is generally considered to be between February 1 and September 1. In addition to tree removal, construction activities associated with the proposed project could result in the loss of fertile eggs, nesting raptors or other migratory birds. Nest abandonment could also occur. If construction, woody or herbaceous vegetation removal, or initial ground disturbance commences during the nesting season, then a pre-construction nesting bird survey is required. If active nests are observed during the pre-construction surveys, project activities must avoid the area as determined by a qualified biologist and resume only after the young have fledged the nest or the nest otherwise becomes inactive.

Removal of any trees or standing snags (i.e. dead standing trees) should also be taken down outside of the bat maternity season (March 1 through July 31). If removal of trees or standing snags is necessary during the bat maternity roosting season, preconstruction surveys for bat maternity roosts is required as described in MM BIO-1.1.

Impact BIO-4: Construction activities and tree removal associated with the proposed project could result in the loss of fertile eggs, nesting raptors and other migratory birds. Nest abandonment could also occur. **(Significant Impact)**

Mitigation and Avoidance Measures: Implementation of the following mitigation measures will reduce potential impacts to nesting birds to less than significant levels through project construction scheduling and completion of pre-construction surveys.

MM BIO-4.1: Construction shall be scheduled to avoid the nesting season to the extent feasible. The nesting season for most birds, including most raptors in the San Francisco Bay area, extends from February 1 through September 1.

MM BIO-4.2: If it is not possible to schedule demolition and construction between September and January, pre-construction surveys for nesting birds shall be completed by a qualified ornithologist no more than seven (7) days prior to the start of work to ensure that no nests will be disturbed during project implementation. During this survey, the ornithologist will inspect all trees and other possible nesting habitats immediately adjacent to the construction areas for nests. If an active nest is found sufficiently close to work areas to be disturbed by construction, the ornithologist, in consultation with CDFW, will determine the extent of a construction-free buffer zone to be established around the nest, typically 50 to 250 feet with the lesser distance for smaller passerine birds and the greater distance for raptors, to ensure that raptor or migratory bird nests will not be disturbed during project construction. Project activities may resume within the buffer zone only after the young have fledged the nest or the nest otherwise becomes inactive. If disturbance does not commence within 7 days of the completed nesting survey, the survey should be repeated to ensure that active nesting has not begun since the previous survey.

Implementation of MM BIO-4.1 and MM BIO-4.2 would ensure that avoidance measures are taken during project construction to avoid the take of any nesting or migratory birds on-site. Thus, the project will not have substantial adverse effects on any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors or nursery sites. **(Less Than Significant with Mitigation Incorporated)**

Impact BIO-5:	The project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. **(Less than Significant Impact)**

Creekside Development Ordinance

Portions of the proposed southern parking lot driveway and portions of the proposed trails would be located within the 50-foot setback buffer zone from Roseland Creek. Ordinarily, all development would be required to be setback a minimum of 50 feet from the creek. However, Section 20-10.050 G. of the Santa Rosa Zoning Code states that "The provisions of this Zoning Code shall not apply to any public project of the City except to the minimum extent required by law." Per the City's Zoning Code, the proposed public park project would not be required to comply with the 50-foot setback requirement in the Creekside Development Ordinance. The ordinance also includes exceptions for paved and unpaved trails, storm drainage, erosion control and creekbank stability improvements. Regardless, the proposed trails are primarily located at the edge of the typical 50-foot creek setback,

except where required to provide access across Roseland Creek and make connections to adjacent transportation facilities. Other proposed park amenities would be located more than 50 feet from Roseland Creek and the project would be required to implement control measures to ensure the project would not result in substantial runoff or erosion impacts (see Section 3.10 Hydrology and Water Quality).

Tree Ordinance

The project has been designed to locate project elements such as trails, play areas and parking lots away from protected trees and outside of tree drip lines, where possible. Elevated boardwalk structures are proposed where necessary to avoid compaction within adjacent tree root zones.

Based on an arborist survey conducted by *WRA* in October 2019 (refer to Appendix C), the areas of the site proposed for improvements contain 355 native trees that are large enough to be considered "heritage" trees per the Tree Ordinance. Of these, approximately four trees were identified in the survey as having the potential for removal, based on their locations relative to the proposed trail alignments and park facilities.

A tree removal permit may be required for any alteration, removal or relocation of heritage, protected or street trees. The optimum work window for tree removal which avoids maternity season and hibernation period for bats, and nesting season for birds is between August 31 and October 15. Replacement plantings will be required as a condition of approval in order to mitigate the loss of functions provided by trees to be removed including shade, erosion control, groundwater replenishment, visual screening, and wildlife habitat. The project site has adequate acreage to accommodate replacement plantings within non-sensitive habitat areas.

In addition to the heritage trees anticipated to be removed, the project will include trail construction within the root zones (defined by the Tree Ordinance as the outer extent of the tree dripline, plus 10 feet) of heritage trees to be preserved. Potential impacts to the canopy or root systems of trees selected for preservation could include damage to branches or trunk during construction, ripping or tearing roots during subgrade excavation, or smothering roots due to soil compaction or grade fills. These types of injuries can lead to reduced tree vigor, increased susceptibility to pathogens or pests, or in severe cases eventual tree decline or death. As described above, the project has been designed to avoid direct and indirect impacts to heritage trees. In order to avoid and minimize any further damage to existing trees additional conditions of approval shall be implemented during construction consistent with the Tree Ordinance.

Standard Conditions: As a condition of approval for tree removal permits, replacement trees shall be planted in accordance with the following criteria from the Ordinance:

- For each six inches or fraction thereof of the diameter of a tree which was approved for removal, two trees of the same genus and species as the removed tree (or another species, if approved by the City), each of a minimum 15-gallon container size, shall be planted on the project site, provided however, that an increased number of smaller size trees of the same genus and species may be planted if approved by the City, or a fewer number of such trees of a larger size if approved by the City.

- If the development site is inadequate in size to accommodate the replacement trees, the trees shall be planted on public property with the approval of the Director of the City's Recreation and Parks Department. Upon the request of the developer and the approval of the Director, the City may accept an in-lieu payment of $100.00 per 15-gallon replacement tree on condition that all such payments shall be used for tree-related educational projects and/or planting programs of the City.

The following relevant tree protection measures during construction are required as a condition of approval, as excerpted from Section 17-24.050 of the Tree Ordinance:

- Before the start of any clearing, excavation, construction or other work on the site, every protected tree shall be securely fenced off at the "protected perimeter," which shall be either the drip line or other limit as may be established by the City. Such fences shall remain continuously in place for the duration of all work undertaken in connection with the development. The area so fenced off shall not be used as a storage area or altered or disturbed except as may be permitted under this subsection.
- If the proposed development, including any site work for the development, will encroach upon the protected perimeter of a protected tree, special measures shall be utilized, as approved by the Director, to allow the roots to obtain oxygen, water, and nutrients as needed. Any excavation, cutting, filling, or compaction of the existing ground surface within the protected perimeter, if authorized at all by the Director, shall be minimized and subject to such conditions as may be imposed by the Director. No significant change in existing ground level shall be made within the drip line of a protected tree. No burning or use of equipment with an open flame shall occur near or within the protected perimeter. All brush, earth and other debris shall be removed in a manner which prevents injury to the protected tree.
- No oil, gas, chemicals or other substances that may be harmful to trees shall be stored or dumped within the protected perimeter of any protected tree, or at any other location on the site from which such substances might enter the perimeter of a protected tree. No construction materials shall be stored within the protected perimeter of a protected tree.
- Underground trenching for utilities shall avoid major support and absorbing tree roots of protected trees. If avoidance is impractical, tunnels shall be made below the roots. Trenches shall be consolidated to service as many units as possible. Trenching within the drip line of protected trees shall be avoided to the greatest extent possible and shall only be done under the on-site directions of a Certified Arborist.
- No concrete or asphalt paving shall be placed within the dripline of protected trees [selected for preservation]. No artificial irrigation shall occur within the root zone of oaks.
- No compaction of the soil within the root zone of protected trees [selected for preservation] shall occur.

The Tree Ordinance also allows the Director to impose additional conditions for work encroaching on the protected perimeter of a protected tree. Where construction activities overlap with heritage tree dripline the following protection measures will be required as conditions of approval:

- A Tree Protection Zone (TPZ) equal to the dripline radius plus 10 feet shall be the standard TPZ for heritage trees selected for preservation in which ground disturbance shall be limited to the maximum extent feasible.
- Where possible, temporary protective fencing shall be installed around the TPZ of each tree designated for preservation prior to commencement of any construction activity conducted within 25 feet of the TPZ, of a tree designated for preservation.
- Many existing trees in the project area selected for preservation are situated too close to project improvements (e.g., trail alignments), where fencing around the TPZ is infeasible. In those cases, high visibility temporary fencing shall be wrapped around the tree trunk to signify the tree is to be saved and to alert machine operators to avoid damaging the tree. Extreme caution shall be taken to avoid mechanical injury to tree trunks, scaffold branches and root flares. As soon as required work is complete within the TPZ, temporary protective fencing shall be installed around the TPZ and shall remain in place as long as ground disturbance activities are taking place.
- The fence shall consist of highly visible material (e.g., orange safety fencing) to prevent inadvertent encroachment by heavy machinery. Heavy equipment use, excavation, fill, grading, trenching, drainage changes or other soil disturbance shall be limited within the TPZ. Material storage, vehicle parking, and trash disposal shall not occur within the TPZ.
- Grading and soil compacting shall be restricted within the TPZ to the maximum extent feasible. If any significant roots (2-inch diameter or greater) are uncovered within the TPZ they shall be kept moist at all times with use of damp burlap fabric, and buried as soon as feasible.
- Grading and/or trail construction within the TPZ of heritage trees shall be monitored periodically by a Certified Arborist. All necessary tree work should be performed by an ISA-Certified Arborist or comparable tree specialist. Improper pruning can be harmful to health and structure of trees. No tree pruning will be permitted unless approved by a Certified Arborist. Any pruning of existing trees shall be performed by a licensed tree care professional and shall comply with the ANSI A300 standards and International Society of Arboriculture (ISA) Best Management Practices for Tree Pruning. All tree pruning tools must be cleaned prior to and after use. All branches being removed shall be cut to, but not beyond, the branch collar. All pruning shall be done in a way that maintains the balance and structure of the tree.
- Site drainage should be designed to create positive drainage away from the trunk of preserved trees, and to prevent ponding within the TPZ. Supplemental irrigation of 1 to 2 inches monthly, may be necessary within the TPZ of preserved trees during construction within the dry season.

With the implementation of the Standard Conditions described above, the project would not conflict with any local policies or ordinances such as tree preservation ordinances. **(Less Than Significant Impact)**

Impact BIO-6:	The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **(Less than Significant Impact)**

As discussed in the response to Question a), above, the project will conform to the recommended avoidance and habitat mitigation measures contained in the Santa Rosa Plain Conservation Strategy to reduce potential impacts to a less than significant level. **(Less Than Significant Impact)**

3.4.2.2 *Cumulative Impacts*

Impact BIO-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant biological resources impact with implementation of mitigation. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

The project vicinity is largely developed with urban uses to the north, east, and west of the project site. Given the highly disturbed nature of these areas, they are unlikely to support biological resources. The Roseland Area/Sebastopol Road Specific Plan EIR addressed all of the development identified in the cumulative project list (Table 3.0-1) and determined that with the implementation of mitigation measures, development in the plan area would not result in cumulative impacts. All projects developed within the City of Santa Rosa are required to comply with the City's Tree Ordinance requirements regarding protecting trees to remain and replacement ratios for trees to be removed. Cumulative projects would also include preconstruction wildlife surveys similar to the project's mitigation measures previously described in order to comply with the MBTA and California Fish and Game Code. Additionally, the cumulative projects are within the Santa Rosa Plain and would incorporate measures consistent with the Santa Rosa Plain Conservation Strategy and USFWS Programmatic Biological Opinion, as applicable. The project would incorporate mitigation measures to address biological resources on the site and, therefore, would not result in a cumulatively considerable contribution to a cumulatively significant biological resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

3.5 CULTURAL RESOURCES

The following discussion is based in part on an architectural and historical evaluation of the 1400 Burbank Avenue property prepared by *Tom Origer & Associates* in May 2011. A copy of the evaluation report is included in Appendix D of this EIR. A cultural resources survey was also completed in January 2011 and is on file with the City.

3.5.1 Environmental Setting

3.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

Federal protection is legislated by the National Historic Preservation Act of 1966 (NHPA) and the Archaeological Resource Protection Act of 1979. These laws maintain processes for determination of the effects on historical properties eligible for listing in the National Register of Historic Places (NRHP). Section 106 of the NHPA and related regulations (36 Code of Federal Regulations [CFR] Part 800) constitute the primary federal regulatory framework guiding cultural resources investigations and require consideration of effects on properties that are listed or eligible for listing in the NRHP. Impacts to properties listed in the NRHP must be evaluated under CEQA.

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archaeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.I), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.[11]

Historical resources eligible for listing in the CRHR must meet the significance criteria described previously and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

The concept of integrity is essential to identifying the important physical characteristics of historical resources and, therefore, in evaluating adverse changes to them. Integrity is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." The processes of determining integrity are similar for both the CRHR and NRHP and use the same seven variables or aspects to define integrity that are used to evaluate a resource's eligibility for listing. These seven characteristics include 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

[11] California Office of Historic Preservation. "CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6." Accessed April 29, 2022. http://www.ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf.

California Native American Historical, Cultural, and Sacred Sites Act

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. The act requires that upon discovery of human remains, construction or excavation activity must cease and the county coroner be notified.

Public Resources Code Sections 5097 and 5097.98

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These procedures are outlined in Public Resources Code Sections 5097 and 5097.98. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the Native American Heritage Commission (NAHC) as the authority to resolve disputes regarding disposition of such remains.

Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the county coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are of a Native American, the county coroner must notify the NAHC. The NAHC then notifies those persons most likely to be related to the Native American remains. The code section also stipulates the procedures that the descendants may follow for treating or disposing of the remains and associated grave goods.

Local

Santa Rosa General Plan 2035

The following General Plan policies pertaining to cultural resources are applicable to the project:

Policy	Description
HP-A-1	Review proposed developments and work in conjunction with the California Historical Resources Information System, Northwest Information Center at Sonoma State University, to determine whether project areas contain known archaeological resources, either prehistoric and/or historic-era, or have the potential for such resources.
HP-A-2	Require that project areas found to contain significant archaeological resources be examined by a qualified consulting archaeologist for recommendations concerning protection and preservation.
HP-A-3	If cultural resources are encountered during development, work should be halted to avoid altering the materials and their context until a qualified consulting archaeologist and Native American representative (if appropriate) have evaluated the situation, and recorded identified cultural resources and determined suitable mitigation measures.

3.5.1.2 *Existing Conditions*

Historical Setting

The project site is located in southwest Santa Rosa, within the bounds of the Rancho Cabeza de Santa Rosa, an 8,885-acre grant made to María Ignacia López de Carrillo, the mother-in-law of General Mariano Vallejo. Traveling from San Diego in 1837, she brought seven of her children to settle on the rancho and built the first European dwelling in the Santa Rosa area. After Señora Carrillo's death in 1849, most of the rancho was divided among her children. James Eldridge filed a claim with the U.S. Lands Commission in 1853 for a 1,668-acre portion in the southwestern quadrant of the Cabeza de Santa Rosa. The claim was confirmed by the district court in 1857, and he received patent to the claim in 1880.

Eldridge sold some 320 acres in the southwest corner of the grant to Joseph McMinn, who was an early settler in the Santa Rosa area having brought his family overland from Missouri in 1852. As an adolescent, John McMinn traveled from Missouri to California with his family, arriving in Sonoma County in 1852, where he worked on his father's farm southwest of Santa Rosa. He married Elizabeth Blair, also from Missouri, in 1861, and together they had eleven children. The McMinns lived on the farm outside of Santa Rosa for many years, moving into town in 1888 when John retired from farming. They sold much of the old farm to Henry Davis near the turn of the 20th century and their sons, John and James Ross, were deeded 40 acres in 1904.

John and James Ross sold eleven of their 40 acres to George Dutton in 1908, leaving them with 29 acres of the original 320-acre farm. Despite living in town, James Ross continued to farm the property, commuting from the family's 5th Street home. His brother John left the area and was in San Francisco working as a bookkeeper by 1910. During the first decade of the 20th century, the area southwest of Santa Rosa was divided again and again, and the once sprawling farmland became a Santa Rosa suburb. Neighbor Henry Davis filed a plat for the West Roseland subdivision in 1912, dividing his parcels into small farm lots, creating Burbank Avenue as part of the subdivision. James Ross McMinn began selling portions of his farm during the 1940's and 50's. A 3.5-acre parcel to the south of the project site was sold to members of the Malde family in 1950. In 1960, 1400 Burbank Avenue was sold to Alf and Borghild Gunderson. Both of these families were Norwegian, and Alf's sister Borgny was married to Paul Malde, who lived next door. The Gunderson family immigrated in 1928, and was in San Francisco in 1930.

Archaeological Setting

Archaeological evidence indicates that human occupation of California began at least 10,000 years ago. Early occupants appear to have had an economy based largely on hunting, with limited exchange, and social structures based on the extended family unit. Later, milling technology and an inferred acorn economy were introduced. At the time of European settlement, the study area was situated in an area controlled by the Southern Pomo. The Southern Pomo were hunter-gatherers who lived in rich environments that allowed for dense populations with complex social structures. They settled in large, permanent villages about which were distributed seasonal camps and task-specific sites. Sites often were situated near freshwater sources and in ecotones where plant life and animal life were diverse and abundant.

In 2011, *Tom Origer & Associates* conducted a cultural resources survey for the proposed Roseland Creek Community Park Project on Burbank Avenue in Santa Rosa, Sonoma County, California, as requested by the City of Santa Rosa. This study included archival research at the Northwest Information Center, Sonoma State University (NWIC File No. 04-501), examination of the library and files of *Tom Origer & Associates*, consultation with the Native American Heritage Commission, and field inspection of the project location. The field survey found no prehistoric cultural resources within the study area.[12]

3.5.2 Impact Discussion

For the purpose of determining the significance of the project's impact on cultural resources, would the project:

1) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?
2) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?
3) Disturb any human remains, including those interred outside of dedicated cemeteries?

3.5.2.1 *Project Impacts*

Impact CUL-1:	The project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact)**

The project site was previously developed with a single-family residence at 1027 McMinn Avenue, a residence and outbuildings at 1370 Burbank Avenue, and a residence and barn at 1400 Burbank Avenue. The buildings have all since been removed and only remnant improvements such as building pads/foundations, driveways, etc. remain on-site. The project would remove the remnant improvements associated with the previous development. Prior to removal, the buildings on-site had all been evaluated for historical significance and were all determined not to be historic.[13,14,15] Implementation of the proposed project would therefore not cause a substantial adverse change in the significance of an historical resource as defined in CEQA Guidelines Section 15064.5. **(Less Than Significant Impact)**

Impact CUL-2:	The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact)**

[12] Tom Origer & Associates. A Cultural Resources Survey for the Roseland Creek Community Park Project. January 11, 2011.
[13] Ibid.
[14] City of Santa Rosa. Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Projects Draft Environmental Impact Report. May 2016.
[15] Tom Origer & Associates. Historical Evaluations of the Buildings at 1400 Burbank Avenue. May 31, 2011.

A cultural resources survey conducted for the site by *Tom Origer & Associates* in 2011 found no prehistoric cultural resources within the study area. Implementation of the proposed project would, therefore, not cause a substantial adverse change in the significance of an archaeological resource. **(Less Than Significant Impact)**

Impact CUL-3:	The project would not disturb any human remains, including those interred outside of dedicated cemeteries with implementation of mitigation. **(Less than Significant Impact with Mitigation Incorporated)**

A Cultural Resources Evaluation was prepared by *Tom Origer & Associates* in January 2011. Archival research from the evaluation found that about 60 percent of the study area was previously inspected for the presence of cultural resources. No prehistoric resources were found within the study area. Harris and Clarke (1991) reported the presence of the T.M. Markham family cemetery dating to the 1860s. Loyd and Beard (2002) talked to nearby residents and were told that headstones and a plaque marked the cemetery location but were removed by a former property owner. Archival research completed in 2002 and 2011 found no information about the cemetery and no evidence of a Markham family in this area during the late 1800s. The study did not find any further evidence of this cemetery, but recommends any ground disturbing activity have a professional archaeologist on-site.

Impact CUL-3: Construction activities associated with the proposed project could result in the disturbance of subsurface prehistoric and/or historic resources, including a 19th century cemetery. **(Significant Impact)**

Mitigation Measures: Implementation of the following mitigation measures will reduce potential impacts to subsurface cultural resources to less than significant levels.

MM CUL-3.1: No prehistoric or historical archaeological sites were found within the study area but a 19th century cemetery is reported to be within the study area. Therefore, any ground disturbing activities in the northeast part of the parcel at 1400 Burbank Avenue (APN 125-331-001) shall be monitored by a professional archaeologist and/or a tribal monitor from culturally affiliated Tribe(s). Implementation of the following mitigation measures will reduce potential impacts to prehistoric and historic resources to less than significant levels.

- If cultural resources are discovered during the project construction (inadvertent discoveries), all work in the area of the find shall cease and a qualified archaeologist and representatives of the culturally affiliated tribe(s) shall be retained by the project sponsor to investigate the find and make recommendations as to treatment and mitigation of any impacts to those resources. A qualified archaeological monitor will be present and will have the authority to stop and redirect grading activities, in consultation with any designated tribal monitors, to evaluate the significance of any archaeological resources discovered on the property.
- If human remains are encountered, consistent with California Health and Safety Code Section 7050.5, no further disturbance shall occur until the

Sonoma County Coroner has made the necessary findings as to origin of the remains. Further, consistent with California Public Resources Code Section 5097.98(b), human remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made.

- If the Sonoma County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within twenty-four (24) hours. The Native American Heritage Commission shall immediately identify the "most likely descendant(s)" and notify them of the discovery. The "most likely descendant(s)" shall make recommendations within forty-eight (48) hours, and engage in consultations with the landowner concerning the treatment of the remains, as provided in Public Resources Code Section 5097.98.

Implementation of MM CUL-3.1 in the event of an inadvertent discovery would ensure that any buried cultural resources encountered on-site during construction would be treated in accordance with existing regulations so as to avoid adversely affecting the discovered resource. Thus, the proposed project would have a less than significant impact on subsurface cultural resources. **(Less Than Significant Impact With Mitigation Incorporated)**

3.5.2.2 *Cumulative Impacts*

Impact CUL-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant cultural resources impact with implementation of mitigation. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

Most development projects in Santa Rosa would require a level of excavation and grading or other activities that may affect archaeological resources, including human remains. Each project is to complete its own literature review, as applicable, to determine the level of archeological and cultural sensitivity of its project site. However, all projects occurring in the City of Santa Rosa would be required to implement mitigation measures, as applicable, that would avoid impacts and/or reduce them to a less than significant level, consistent with CEQA requirements (see MM CUL-3.1 above). Such measures consist of preliminary investigation prior to full excavation, avoidance measures during ground disturbance activities, and/or monitoring during ground disturbance activities. Collection and evaluation of finds are also part of these mitigation measures. These projects would also be subject to federal, state, and county laws regulating cultural resources such as protocols of handling human remains, if found on the project site. For these reasons, the proposed project in combination with the cumulative scenario projects would not result in a significant cultural resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

3.6 ENERGY

3.6.1 Environmental Setting

3.6.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

At the federal level, energy standards set by the EPA apply to numerous consumer products and appliances (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. Governor Schwarzenegger issued Executive Order (EO) S-3-05, requiring statewide emissions reductions to 80 percent below 1990 levels by 2050. In 2008, EO S-14-08 was signed into law, requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

Executive Order B-55-18 To Achieve Carbon Neutrality

In September 2018, Governor Brown issued an executive order, EO-B-55-18 To Achieve Carbon Neutrality, setting a statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." The executive order requires CARB to "ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal." EO-B-55-18 supplements EO S-3-05 by requiring not only emissions reductions, but also that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO_2 from the atmosphere through sequestration.

California Building Standards Code

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6 of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years.[16] Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.[17]

[16] California Building Standards Commission. "California Building Standards Code." Accessed June 2, 2022. https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo.
[17] California Energy Commission (CEC). "2019 Building Energy Efficiency Standards." Accessed June 2, 2022. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

California Green Building Standards Code

CALGreen establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars program in 2012 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2015 through 2025. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.[18]

3.6.1.2 *Existing Conditions*

Total energy usage in California was approximately 6,923 trillion British thermal units (Btu) in the year 2020, the most recent year for which this data was available.[19] Out of the 50 states, California is ranked second in total energy consumption and 48th in energy consumption per capita. The breakdown by sector was approximately 22 percent (1,508 trillion Btu) for residential uses, 20 percent (1,358 trillion Btu) for commercial uses, 24 percent (1,701 trillion Btu) for industrial uses, and 34 percent (2,355 trillion Btu) for transportation.[20] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity

Electricity in Sonoma County in 2020 was consumed primarily by the non-residential sector (53 percent), followed by the residential sector consuming 47 percent. In 2020, a total of approximately 2,868 gigawatt hours (GWh) of electricity was consumed in Sonoma County.[21]

Electricity is provided to the City of Santa Rosa by Sonoma Clean Power (SCP). SCP is a not-for-profit public agency operated by the Cities of Cloverdale, Cotati, Fort Bragg, Petaluma, Point Arena, Rohnert Park, Santa Rosa, Sebastopol, Sonoma, Willits, the Town of Windsor, and the Counties of Sonoma and Mendocino. SCP generates electricity for its commercial and residential customers in Sonoma and Mendocino counties from renewable sources. Electricity provided by SCP is delivered through PG&E transmission lines. The City of Santa Rosa municipal accounts are subscribed to SCP's Evergreen program that provides 100 percent renewable electricity from local sources.

[18] California Air Resources Board. "The Advanced Clean Cars Program." Accessed June 2, 2022. https://www.arb.ca.gov/msprog/acc/acc.htm.
[19] United States Energy Information Administration. "State Profile and Energy Estimates, 2020." Accessed November 12, 2022. https://www.eia.gov/state/?sid=CA#tabs-2.
[20] Ibid.
[21] California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed June 2, 2022. http://ecdms.energy.ca.gov/elecbycounty.aspx.

Natural Gas

PG&E provides natural gas services within the City of Santa Rosa. In 2020, approximately two percent of California's natural gas supply came from in-state production, while the remaining supply was imported from other western states and Canada.[22] In 2020, Sonoma County used approximately one percent of the state's total consumption of natural gas.[23]

Fuel for Motor Vehicles

In 2019, 15.4 billion gallons of gasoline were sold in California.[24] The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13.1 miles per gallon (mpg) in the mid-1970s to 25.4 mpg in 2020.[25] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was updated in March 2020 to require all cars and light duty trucks achieve an overall industry average fuel economy of 40.4 mpg by model year 2026. [26,27]

3.6.2 Impact Discussion

For the purpose of determining the significance of the project's impact on energy, would the project:

1) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
2) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?
3) Result in a substantial increase in demand upon energy resources in relation to projected supplies?

[22] California Gas and Electric Utilities. 2020 *California Gas Report.* Accessed June 2, 2022. https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf.
[23] California Energy Commission. "Natural Gas Consumption by County." Accessed June 2, 2022. http://ecdms.energy.ca.gov/gasbycounty.aspx.
[24] California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed June 2, 2022. https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist.
[25] United States Environmental Protection Agency. "The 2021 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." November 2021. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1010U68.pdf
[26] United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed June 2, 2022. http://www.afdc.energy.gov/laws/eisa.
[27] Public Law 110–140—December 19, 2007. *Energy Independence & Security Act of 2007.* Accessed June 2, 2022. http://www.gpo.gov/fdsys/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf.

3.6.2.1 *Project Impacts*

Impact EN-1:	The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. **(Less than Significant Impact)**

Energy Efficiency During Construction

The construction phase would require energy for the manufacture and transportation of building materials, site preparation, grading and excavation, trenching, paving, and building construction and interior finishing. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy during construction. Energy would not be wasted or used inefficiently by construction equipment, as the proposed project would include measures to improve efficiency of the construction (e.g., limiting idling time). Consistent with CALGreen requirements, construction waste management methods and processes would be employed to reduce the amount of construction waste generated by the project. **(Less than Significant Impact)**

Energy Use of Project Operation

The proposed project includes the construction of a nature center and restroom north of Roseland Creek and a restroom adjacent to the sports court and lawn area. Operation of the proposed nature center and restrooms would consume electricity and natural gas from heating and cooling, lighting, appliances, and water heating. The proposed parking lots and trails may also include outdoor nighttime lighting, which would consume electricity. The project would conform to CALGreen Tier 1 standards.

Energy would also be consumed during each vehicle trip generated by future park visitors. The project would not generate a significant amount of vehicle miles traveled (VMT), as discussed further in Section 3.17 Transportation. Therefore, future visitors of the proposed park would not consume a significant amount of energy traveling to and from the project site. Additionally, new automobiles purchased by future visitors of the proposed project would be subject to fuel economy and efficiency standards applied throughout the State of California, which means that over time the fuel efficiency of vehicles associated with the project site would improve. Therefore, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. **(Less than Significant Impact)**

Impact EN-2:	The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

According to the 2019 Integrated Energy Policy Report, the state is working towards decarbonizing the energy system and moving towards a 100-percent carbon-free system by 2045.[28] The project would obtain electricity from SCP that is 100 percent renewable. The City's Climate Action Plan would also ensure buildings meet net zero electricity use (refer to Section 3.8 Greenhouse Gas Emissions). Natural gas usage on the site would be limited to space and water heating in the proposed structures. The project is required to comply with applicable regulations and City policies

[28] California Energy Commission. *2019 Integrated Energy Policy Report*. 2019.

that would conserve energy and water, and reduce fuel consumption and waste generation. For these reasons, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less Than Significant Impact)**

Impact EN-3:	The project would not result in a substantial increase in demand upon energy resources in relation to projected supplies. **(Less than Significant Impact)**

Energy consumption associated with project operation would be limited in scope. As previously discussed, energy consumption would be associated with operation of the proposed visitor center and restrooms, additional outdoor nighttime safety lighting, and visitors traveling to and from the project site. The project would not represent a substantial net increase in energy consumption at the project site. Therefore, the project would not result in a substantial increase in demand upon energy resources in relation to projected supplies. **(Less than Significant Impact)**

3.6.2.2 *Cumulative Impacts*

Impact EN-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant energy impact. **(Less than Significant Cumulative Impact)**

By its nature, energy is a cumulative resource. Past, present, and future development projects contribute to the state's energy impacts. If the project is determined to have a significant energy impact, it is concluded that the impact is cumulatively considerable. As discussed under Impact EN-1 and Impact EN-2 above, the project itself would not result in significant energy impacts. Further, all projects in the City of Santa Rosa are required to meet CALGreen and Title 24 energy efficiency requirements, thus lessening overall energy demand. The Roseland Area/Sebastopol Road Specific Plan EIR addressed all of the development identified in the cumulative projects and determined that with implementation of the energy saving policies of the General Plan, no cumulative energy impact would result. The project proposes a limited number of energy using facilities and would be constructed to meet the efficiency standards in current building codes. The project, therefore, would not result in a considerable contribution to a significant cumulative energy impact. **(Less than Significant Cumulative Impact)**

3.7 GEOLOGY AND SOILS

3.7.1 Environmental Setting

3.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The act regulates development in California near known active faults due to hazards associated with surface fault ruptures. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction. Areas within an Alquist-Priolo Earthquake Fault Zone require special studies to evaluate the potential for surface rupture to ensure that no structures intended for human occupancy are constructed across an active fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) was passed in 1990 following the 1989 Loma Prieta earthquake. The SHMA directs the California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. CGS has completed seismic hazard mapping for the portions of California most susceptible to liquefaction, landslides, and ground shaking, including the central San Francisco Bay Area. The SHMA requires that agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the seismic hazard is present and identify measures to reduce earthquake-related hazards. The project site is not located in an Alquist-Priolo Earthquake Fault Zone.

California Building Standards Code

The CBC prescribes standards for constructing safe buildings. The CBC contains provisions for earthquake safety based on factors including occupancy type, soil and rock profile, ground strength, and distance to seismic sources. The CBC requires that a site-specific geotechnical investigation report be prepared for most development projects to evaluate seismic and geologic conditions such as surface fault ruptures, ground shaking, liquefaction, differential settlement, lateral spreading, expansive soils, and slope stability. The CBC is updated every three years.

California Division of Occupational Safety and Health Regulations

Excavation, shoring, and trenching activities during construction are subject to occupational safety standards for stabilization by the California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) under Title 8 of the California Code of Regulations and Excavation Rules. These regulations minimize the potential for instability and collapse that could injure construction workers on the site.

Public Resources Code Section 5097.5

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. They range from mammoth and dinosaur bones to impressions of ancient animals and plants, trace remains, and microfossils. These materials are valued for the information they yield about the history of the earth and its past ecological settings. California Public Resources Code Section 5097.5 specifies that unauthorized removal of a paleontological resource is a misdemeanor. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it would disturb or destroy a unique paleontological resource or site or unique geologic feature.

Local

Santa Rosa General Plan 2035

The following General Plan policies pertaining to geology and soils are applicable to the project:

Policy	Description
NS-C-1	Prior to development approval, require appropriate geologic studies to identify fault trace locations within active fault zones as designated by the provisions of the Alquist-Priolo Earthquake Fault Zoning Act. California registered geologists or engineers must conduct these studies and investigation methodologies must comply with guidelines set forth by the Alquist-Priolo Earthquake Fault Zoning Act. Compliance with the Act would insure proper setback or appropriate design to minimize the potential hazards resulting from fault movement and surface displacement.
NS-C-2	Require comprehensive geotechnical investigations prior to development approval, where applicable. Investigations shall include evaluation of landslide risk, liquefaction potential, settlement, seismically-induced landsliding, or weak and expansive soils. Evaluation and mitigation of seismic hazards, including ground shaking, liquefaction, and seismically-induced landslides, shall comply with guidelines set forth in the most recent version of the California Division of Mines and Geology (CDMG) Special Publication 117. The level of investigation would depend on physical site location, local or regional geologic or seismic hazards, and recommendations by a consulting engineer.
NS-C-3	Restrict development from areas where people might be adversely affected by known natural or manmade geologic hazards. Hazards might include unstable slopes, liquefiable soils, expansive soils or weak poorly engineered fills, as determined by a California registered geologist or engineer.
NS-C-4	Restrict development of critical facilities—such as hospitals, fire stations, emergency management headquarters, and utility lifelines, including broadcast services, sewage treatment plants, and other places of large congregations—in areas determined as high-risk geologic hazard zones (e.g., Rodgers Creek Fault zone, liquefiable soils, areas of slope instability).

HP-A-2	Require that project areas found to contain significant archaeological resources be examined by a qualified consulting archaeologist for recommendations concerning protection and preservation.
HP-A-3	If cultural resources are encountered during development, work should be halted to avoid altering the materials and their context until a qualified consulting archaeologist and Native American representative (if appropriate) have evaluated the situation, and recorded identified cultural resources and determined suitable mitigation measures.

3.7.1.2 *Existing Conditions*

The City of Santa Rosa lies within the northeastern portion of the Cotati Valley found along the Santa Rosa Plain and also includes part of the Sonoma Mountains to the east. The planning area can be characterized by three distinct topographic regimes: gently sloping alluvial plains, upland foothills, and low valleys. The City is situated at the confluence of Matanzas Creek and Santa Rosa Creek, both of which originate from the Sonoma Mountains to the east. The Santa Rosa Plain slopes gently towards the west, away from the uplands, towards the lowest elevations of Cotati Valley.

Topography and Soils

The project site is relatively flat with slopes of less than two percent. The entirety of the project site is underlain by soils of the Yolo, Zamora, Wright and Clear Lake Series and alluvial deposits. These soils have textures ranging from clay to clay loam to silty clay loam. They have very slow to moderate infiltration rates, and are moderately to well-drained.

Seismicity and Seismic-Related Hazards

The City of Santa Rosa lies adjacent to the Rodgers Creek Fault Zone and is approximately eight miles southwest of the Maacama Fault Zone and 20 miles northeast of the San Andreas Fault Zone. The Hayward-Rodgers Creek and San Andreas fault systems are two principally active, Bay Area strike-slip-type faults that have been responsible for historic earthquakes within the last 150 years. The Rodgers Creek fault is considered an extension of the Hayward fault and has experienced historic seismic events in 1969 and 1898. The Maacama Fault Zone experienced movement within the last 11,000 years and is capable of producing a maximum moment magnitude 7.1 earthquake. Other principal faults capable of producing ground shaking in Santa Rosa include the East Bay's Hayward, San Gregorio-Hosgri Fault Zone along the San Mateo Coast, the Calaveras fault, and Concord-Green Valley fault.

The project site is approximately three miles from the Rodgers Creek Fault Zone, ten miles from the Maacama Fault, and 22 miles from the San Andreas Fault. Due to the proximity of the project site to these active or potentially active faults, ground shaking, ground failure, and/or liquefaction as a result of an earthquake could cause damage to structures on the site. An earthquake of moderate to high magnitude generated within the San Francisco Bay region could cause considerable ground shaking at the project site. Strong shaking during an earthquake can result in ground failure such as that associated with soil liquefaction, lateral spreading, and differential compaction. These seismic-related hazards are discussed below.

The site is not within an Earthquake Fault Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known active or potentially active faults exist on the site.

Liquefaction

Liquefaction is the result of seismic activity and is characterized as the transformation of loose water saturated soils from a solid state to a liquid state during ground shaking. According to the General Plan, the project site is not located in an area that is prone to liquefaction hazards.

Landslides

Landsliding due to static forces (not seismically induced) could occur in developed and undeveloped upland areas. Landslide potential increases in areas where construction activity, such as road building or grading for building sites, reduces slope support or in areas where residential development has led to ground saturation or removal of adequate lateral support. Over-steepened slopes, slope saturation in areas of heavy rainfall, and removal of slope vegetation can also increase landslide potential. Instability of existing slopes could expose people to rockfall hazards and property damage. Failure in cut slopes produced during grading could cause damage and disrupt construction projects. Landslides can damage building beyond repair by dislodging the structure from the foundation or causing collapse as the slope beneath fails and moves downslope.

Paleontological Resources

The *Santa Rosa General Plan 2035* does not identify paleontological resources in the City. The geological formations within the project area have not been identified as sensitive for paleontological resources.[29]

3.7.2 Impact Discussion

For the purpose of determining the significance of the project's impact on geology and soils, would the project:

1) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?
    - Strong seismic ground shaking?
    - Seismic-related ground failure, including liquefaction?
    - Landslides?
2) Result in substantial soil erosion or the loss of topsoil?
3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

[29] City of Santa Rosa. Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Projects Draft Environmental Impact Report. May 2016.

4) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?
5) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?
6) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

3.7.2.1 *Project Impacts*

Impact GEO-1:	The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides**. (Less than Significant Impact)**

Surface Fault Rupture and Seismic Shaking

The project site is located in a seismically active region of California and strong ground shaking would be expected during the lifetime of the proposed project. The closest active fault is the Rodgers Creek Fault, located approximately three miles northeast of the site. Because of the proximity of the Rodgers Creek Fault, there is a high probability that seismic ground shaking will affect the project site during the life of the proposed park structures. There are no known active faults traversing the project site and the site is not located in an Alquist-Priolo Earthquake Fault Zone. Potential for surface rupture from displacement or fault movement directly beneath the proposed project is, therefore, considered low. **(Less Than Significant Impact)**

Landslides

The project site is relatively flat, with a general slope of less than two percent. According to the General Plan Geologic and Seismic Hazards Map, the site is not located in or near any Landslide Complexes or Areas of Relatively Unstable Rock on Slopes of Greater than 15%. Therefore, there is a very low potential for adverse impacts from the project related to landslides. **(Less Than Significant Impact)**

Liquefaction and Lateral Spreading

Liquefaction typically occurs in areas underlain with loose saturated cohesionless soils within the upper 50 feet of subsurface materials. These soils, when subjected to ground shaking, can lose their strength resulting from the buildup of excess pore water pressure causing them to behave closer to a liquified state. According to the General Plan, the project site is not located in an area that is prone to liquefaction hazards.

The project site is located in a relatively flat area and would not be exposed to nor cause substantial lateral spreading. Planned structures within the park are setback from Roseland Creek and would not be affected by lateral spreading. Due to the relatively flat nature of the site, the project would not be

exposed to substantial slope instability, or erosion. Dewatering is not required for the construction of the project. **(Less Than Significant Impact)**

Impact GEO-2:	The project would not result in substantial soil erosion or the loss of topsoil. **(Less than Significant Impact)**

Project construction activities would include grading that could result in the loss of topsoil. As discussed in Section 3.10 Hydrology and Water Quality, the project shall be required to implement construction sediment and erosion control measures as a Standard Condition of Approval. Through the implementation of the Standard Condition of Approval, the proposed project would avoid soil erosion and would not cause a significant loss of topsoil. **(Less than Significant Impact)**

Impact GEO-3:	The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

As described under Impact GEO-1, the project site is not prone to seismic hazards associated with geologic units or soil that is unstable. The project site is not prone to landslides, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

Impact GEO-4:	The project would not be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property. **(Less than Significant Impact)**

The project shall be constructed in accordance with the standard engineering practices in the California Building Code, as adopted by the City of Santa Rosa. Additionally, General Plan Policies NS-C-1 through NS-C-4 generally restrict development in areas of high hazards and require geotechnical investigations to evaluate potential hazards and provide recommendations to mitigate. Therefore, potential impacts from the presence of locally compressible and potentially expansive soils on the site would be less than significant. **(Less Than Significant Impact)**

Impact GEO-5:	The project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. **(No Impact)**

The project does not propose the use of septic tanks or alternative wastewater disposal systems as the project site is currently served with sanitary service provided by the City of Santa Rosa. **(No Impact)**

Impact GEO-6:	The project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. **(No Impact)**

The Santa Rosa General Plan 2035 EIR does not identify paleontological resources in the City. It is therefore not anticipated that there would be significant risk of discovery of or damage to paleontological resources resulting from the implementation of the proposed park project. Although the potential exists for ground-disturbing activities to inadvertently impact an unknown resource, if these resources are inadvertently discovered, General Plan Policies HP-A-2 and HP-A-3 (with assistance from a paleontologist) will be implemented along with federal and state statutes protecting these resources from disturbance and destruction.

No paleontological resources, nor the potential for paleontological resources to exist was identified on the project site. Therefore, no impacts to paleontological resources are anticipated to result from the proposed park project, and no mitigation measures are required. **(No Impact)**

3.7.2.2 *Cumulative Impacts*

Impact GEO-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant geology and soils impact. **(Less than Significant Cumulative Impact)**

The projects listed in Table 3.0-1 would be subject to similar geologic conditions, given their proximity to the proposed project site. These projects would also require site-specific, design-level geotechnical reports, as described under Impact GEO-4, and would be constructed consistent with the CBC in order to avoid impacts from seismicity and geology and soils hazards, and/or reduce them to a less than significant level. Projects in the cumulative scenario would also be required to implement similar mitigation as the measures described under Impact GEO-6 with regards to avoidance and lessening of paleontological impacts. Additionally, environmental impacts associated with geology and soils in an area with generally flat topography would be limited to each individual project site by nature. Development of one project site, consistent with current building codes, would not affect the geologic conditions of other sites and thus, there are no cumulative geology and soils impacts. The proposed project would be constructed consistent with the California Building Code and General Plan policies and, therefore, would not result in a cumulatively considerable contribution to a cumulatively significant geology and soils impact. **(Less than Significant Cumulative Impact)**

3.8 GREENHOUSE GAS EMISSIONS

3.8.1 Environmental Setting

3.8.1.1 *Background Information*

Gases that trap heat in the atmosphere, GHGs, regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. In GHG emission inventories, the weight of each gas is multiplied by its global warming potential (GWP) and is measured in units of CO_2 equivalents (CO_2e). The most common GHGs are carbon dioxide (CO_2) and water vapor but there are also several others, most importantly methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These are released into the earth's atmosphere through a variety of natural processes and human activities. Sources of GHGs are generally as follows:

- CO_2 and N_2O are byproducts of fossil fuel combustion.
- N_2O is associated with agricultural operations such as fertilization of crops.
- CH_4 is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations.
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents, but their production has been stopped by international treaty.
- HFCs are now used as a substitute for CFCs in refrigeration and cooling.
- PFCs and SF_6 emissions are commonly created by industries such as aluminum production and semiconductor manufacturing.

An expanding body of scientific research supports the theory that global climate change is currently causing changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. The climate and several naturally occurring resources within California are adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and/or loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

3.8.1.2 *Regulatory Framework*

State

Assembly Bill 32

Under the California Global Warming Solutions Act, also known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources.

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to express the 2030 statewide target in terms of million metric tons of CO_2e ($MMTCO_2e$). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 $MMTCO_2e$.

Senate Bill 375

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. SB 375 builds upon AB 32 by requiring CARB to develop regional GHG reduction targets for automobile and light truck sectors for 2020 and 2035. The per capita GHG emissions reduction targets for passenger vehicles in the San Francisco Bay Area include a seven percent reduction by 2020 and a 15 percent reduction by 2035.

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with the Association of Bay Area Governments (ABAG), BAAQMD, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2050. Plan Bay Area 2050 establishes a course for reducing per capita GHG emissions through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).

Regional and Local

2017 Clean Air Plan

To protect the climate, the 2017 CAP (prepared by BAAQMD) includes control measures designed to reduce emissions of methane and other super-GHGs that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. The jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing GHG impacts developed by BAAQMD within the CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

Climate Action Plan

In June 2012, the City of Santa Rosa adopted a comprehensive Climate Action Plan (CAP), the purpose of which was to present measures which would reduce local greenhouse gas emissions, to meet state, regional, and local reduction targets, and to streamline future environmental review of projects within Santa Rosa by following the California Environmental Quality Act (CEQA) Guidelines and meeting the BAAQMD expectations for a Qualified GHG Reduction Strategy.

The CAP is intended to achieve the City's fair share of statewide emissions reductions by the year 2020 consistent with AB 32, the Global Warming Solutions Act. The CAP has also been designed to achieve community-wide GHG emission reductions by 2035 to levels on a trajectory toward the Executive Order S-3-05 target for 2050 (i.e., 80 percent below 1990 levels by 2050).[30] It specifies the strategies and measures to be taken for a number of topic areas (energy and conservation, renewable energy, parking and land use management, waste reduction, recycling & composting, water and wastewater, etc.) citywide to achieve the overall emission reduction target, and reflect a diverse mix of regulatory and incentive-based programs for both new and existing development.

CEQA clearance for all discretionary development proposals are required to address the consistency of individual projects with reduction measures in the CAP and goals and policies in the General Plan designed to reduce GHG emissions. Compliance with appropriate measures in the CAP would ensure an individual project's consistency with the adopted GHG reduction plan. Projects that are consistent with the CAP would have a less than significant impact related to GHG emissions.

City of Santa Rosa General Plan 2035

The CAP and the Santa Rosa General Plan 2035 (General Plan) work in conjunction to facilitate GHG emissions reductions. Measures, policies and projects that reduce community-wide GHGs presented in the CAP are aligned with the goals and policies in the General Plan. In addition, the General Plan provides the basis for analyzing proposed development to determine consistency with the CAP goals and measures. The measures presented in the CAP are referenced generally throughout the General Plan, although the following policy contained in the General Plan explicitly references the CAP:

Policy	Description
OSC-M-1	Meet local, regional and state targets for reduction of greenhouse gas emissions through implementation of the Climate Action Plan.

3.8.1.3 *Existing Conditions*

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth and changes in weather patterns.

The project site is currently undeveloped, but previously contained single-family residences on three of the parcels. Residential development typically results in greenhouse gas (GHG) emissions from building operations (e.g., heating/cooling and lighting) and vehicular travel to and from the site. Under existing conditions, GHG emissions associated with site maintenance would be minimal.

[30] Ibid.

3.8.2 Impact Discussion

For the purpose of determining the significance of the project's impact on greenhouse gas emissions, would the project:

1) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
2) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

3.8.2.1 *Thresholds of Significance*

On April 20, 2022, BAAQMD adopted new thresholds of significance for operational GHG emissions from land use projects beginning the CEQA process. The following framework is how BAAQMD will determine GHG significance moving forward.[31]

A. Projects must include, at a minimum, the following project design elements:
    a. Buildings
        i. The project will not include natural gas appliances or natural gas plumbing (in both residential and non-residential development).
        ii. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
    b. Transportation
        i. Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
            1. Residential Projects: 15 percent below the existing VMT per capita
            2. Office Projects: 15 percent below the existing VMT per employee
            3. Retail Projects: no net increase in existing VMT
        ii. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.
B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Any new land use project would have to include either section A or B from the above list, not both, to be considered in compliance for GHG emissions from project operation.

[31] Justification Report: BAAQMD CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Project and Plans. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-thresholds-2022/justification-report-pdf.pdf?la=en

3.8.2.2 *Project Impacts*

Impact GHG-1:	The project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. **(Less than Significant Impact)**

Greenhouse gas emissions worldwide contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single land use project could generate sufficient GHG emissions on its own to noticeably change the global average temperature. The combination of GHG emissions from past, present, and future projects in Santa Rosa, the entire state of California, and across the nation and around the world, contribute cumulatively to the phenomenon of global climate change and its associated environmental impacts.

Per the CEQA Guidelines Section 15064 (b), a Lead Agency may analyze and mitigate significant GHG emissions in a plan for the reduction of GHG emissions that has been adopted in a public process following environmental review. The City of Santa Rosa adopted its CAP (a GHG reduction strategy) in 2012 which is in conformance with its most recent General Plan Update. The CAP has been designed to achieve community-wide GHG emission reductions by 2035 to levels on a trajectory toward the Executive Order S-3-05 target for 2050 (i.e., 80 percent below 1990 levels by 2050).[32] The threshold of significance for whether a development project in the City of Santa Rosa would generate GHG emissions that would have a significant impact on the environment, therefore, would be whether or not the project conforms to the applicable reduction measures the City's CAP.

Greenhouse gas emissions from the proposed project would include emissions from construction and operation of the project. The GHG emissions from the project would include:

- Construction emissions;
- Emission from the manufacture and transport of building materials;
- Mobile emissions (e.g., emissions from combustion of fossil fuels for vehicle trips to and from the site); and
- Emissions from the generation of electricity to operate lighting and maintenance equipment on the site.

Operational Greenhouse Gas Emissions

The project consists of a community park that includes permeable and paved parking areas, restrooms/hydration stations, a nature center, picnic areas, sports court, a lawn area, and a network of interconnected trails with interpretive signage and fitness stations.

The proposed project would implement the following Green Building measures to reduce GHG emissions:

- Reduce light pollution through project design,

[32] Ibid.

- Comply with the current provisions of CALGreen,
- Design buildings to be built with net zero electricity use,
- Include low-flow water fixtures to reduce potable water use, and
- Use water efficient landscaping and reclaimed water for irrigation, where feasible.
- Use all-electric landscape maintenance equipment.

The City of Santa Rosa contracts with Sonoma Clean Power to provide electricity from 100 percent renewable sources for municipal use through its EverGreen program. The City's use of renewable electricity sources, the proposed low-VMT park use, and water conservation measures would ensure operational GHG emissions are minimized. The proposed 19.49-acre park, most of which would remain undeveloped, would not result in significant impacts from operational GHG emissions. **(Less Than Significant Impact)**

Construction Greenhouse Gas Emissions

GHG emissions would occur during grading of the site and construction of the project. Construction of the project would involve emissions associated with equipment, vehicles, and manufacturing materials used to construct the project.

The project site currently contains remnant infrastructure from the prior residential development on three of the parcels that would generate minimal demolition and construction waste. Nevertheless, waste generated from demolition and construction would be salvaged and recycled to the extent practical to reduce waste going to the landfill. Project construction and demolition would have a minimum waste diversion rate of 65 percent, consistent with CALGreen construction and demolition debris diversion requirements.

The project site is an infill site located in an urbanized location near construction supply and equipment companies, which would help to minimize GHG emissions generated by transport of construction materials and waste associated with the project.

Neither the City of Santa Rosa nor BAAQMD have quantified thresholds for construction activities. Given that the project is in an urban setting close to companies that provide construction supplies and equipment, discarded materials would be salvaged or recycled, and the project would implement the best management practices outlined in Section 3.3 Air Quality, construction of the project would not contribute substantially to local or regional GHG emissions. **(Less Than Significant Impact)**

Impact GHG-2:	The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. **(Less than Significant Impact)**

Climate Action Plan

As described previously, the City of Santa Rosa Climate Action Plan was adopted in June 2012. The CAP identifies a series of GHG emissions reduction measures that would allow the City to achieve its GHG reduction goals. The measures center around nine topic areas:

- Energy Efficiency and Conservation;
- Renewable Energy;
- Parking and Land Use Management
- Improved Transport Options
- Optimized Vehicular Travel
- Waste Reduction, Recycling, Composting
- Water and Wastewater
- Transportation and Land Use
- Urban Heat Island Effect.

Of these nine topic areas, three are applicable to development projects such as the proposed community park. The project's conformance with applicable reduction measures is discussed below.

Energy Efficiency and Conservation

Measure 1.1: CALGreen Requirements for New Construction

Measure 1.1 calls for the continued enforcement and requirement of new development to meet Tier 1 CALGreen requirements, as amended, for new non-residential development. The proposed project would conform to these requirements for the proposed restroom/hydration station and nature center buildings.

Measure 1.4: Tree Planting and Urban Forestry

Measure 1.4 requires the planting and maintenance of trees on private property, streets and open space areas. This is applicable to the proposed community park, which will include the planting of new trees.

Measure 1.5: Cool Roofs and Pavements

Measure 1.5 requires new sidewalks, crosswalks, and parking lots to be made of cool paving materials with a high solar reflectivity. The project includes the construction of paved parking lots that will conform to this requirement.

Parking and Land Use Management

Measure 3.2: Diversity and Destination Accessibility

Measure 3.2 recommends planning for a variety of complimentary land uses within walking distance of each other, such as housing, neighborhood-serving retail, and recreational facilities, to decrease the need for vehicular travel. The project, which proposes the development of a community park, is consistent with this measure. The future park is intended to serve the surrounding community, and provides pedestrian links between adjacent neighborhoods as well as recreational facilities.

Water and Wastewater

Measure 7.1: Water Conservation

Measure 7.1 seeks to continue to require and incentivize water conservation. The project is consistent with this measure in that it will incorporate water-efficient landscaping and irrigation equipment.

The project is consistent with the CAP and would not preclude the City from reaching its GHG emissions reduction goals. The City's CAP is considered a qualified GHG reduction strategy; therefore, the project is considered in compliance with BAAQMD's CEQA Guidelines because it is consistent with the City's CAP. **(Less Than Significant Impact)**

3.8.2.3 *Cumulative Impacts*

Impact GHG-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant GHG emissions impact. **(Less than Significant Cumulative Impact)**

GHG emissions are cumulative by their nature and have a broader, global impact; therefore, if a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable. As discussed in Impact GHG-1 and GHG-2, the project would not result in significant GHG impacts. Therefore, the project would not have a cumulatively considerable contribution to a significant cumulative GHG emissions impact. **(Less than Significant Cumulative Impact)**

3.9 HAZARDS AND HAZARDOUS MATERIALS

The following discussion is based in part on Phase I Environmental Site Assessments (ESAs) of the site prepared by *Econ, Harris & Lee Environmental Services, LLC*, and *EBA Engineering*, as well as on a Limited Phase II Environmental Site Assessment prepared by *ATC*. The *Harris & Lee* report was completed in 2010 and covered the two northernmost of the four parcels that constitute the project site. The *Econ* report, also completed in 2010, covered the southernmost parcel, and the *EBA* report, prepared in March 2018 covered the privately owned and occupied parcel in the middle of the site. A Limited Phase II ESA for the site was completed in October 2018. Copies of these reports are included in Appendix E through Appendix H of this EIR.

3.9.1 Environmental Setting

3.9.1.1 *Regulatory Framework*

Overview

The storage, use, generation, transport, and disposal of hazardous materials and waste are highly regulated under federal and state laws. In California, the EPA has granted most enforcement authority over federal hazardous materials regulations to the California Environmental Protection Agency (CalEPA). In turn, local agencies have been granted responsibility for implementation and enforcement of many hazardous materials regulations under the Certified Unified Program Agency (CUPA) program.

Worker health and safety and public safety are key issues when dealing with hazardous materials. Proper handling and disposal of hazardous material is vital if it is disturbed during project construction. Cal/OSHA enforces state worker health and safety regulations related to construction activities. Regulations include exposure limits, requirements for protective clothing, and training requirements to prevent exposure to hazardous materials. Cal/OSHA also enforces occupational health and safety regulations specific to lead and asbestos investigations and abatement.

Federal and State

Federal Aviation Regulations Part 77

Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace (FAR Part 77) sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the Federal Aviation Administration (FAA) be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above the ground.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad federal authority to respond directly

to releases or threatened releases of hazardous substances that may endanger public health or the environment. Over five years, $1.6 billion was collected and the tax went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA accomplished the following objectives:

- Established prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- Provided for liability of persons responsible for releases of hazardous waste at these sites; and
- Established a trust fund to provide for cleanup when no responsible party could be identified.

The law authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response; and
- Long-term remedial response actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life-threatening. These actions can be completed only at sites listed on the EPA's National Priorities List.

CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.[33]

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. RCRA gives the EPA the authority to control hazardous waste from the "cradle to the grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization, phasing out land disposal of hazardous waste, and corrective action for releases. Some of the other mandates of this law include increased enforcement authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.[34]

[33] United States Environmental Protection Agency. "Superfund: CERCLA Overview." Accessed May 2, 2022. https://www.epa.gov/superfund/superfund-cercla-overview.
[34] United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed May 2, 2022. https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act.

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).[35]

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. Certain substances are generally excluded from TSCA, including, among others, food, drugs, cosmetics, and pesticides. The TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

California Accidental Release Prevention Program

The California Accidental Release Prevention (CalARP) Program aims to prevent accidental releases of regulated hazardous materials that represent a potential hazard beyond the boundaries of a property. Facilities that are required to participate in the CalARP Program use or store specified quantities of toxic and flammable substances (hazardous materials) that can have off-site consequences if accidentally released. The Santa Rosa Fire Department reviews CalARP risk management plans as the CUPA.

Asbestos-Containing Materials

Friable asbestos is any asbestos-containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-friable ACMs are asphalt roofing shingles, vinyl floor tiles, and transite siding made with cement. The EPA began phasing out use of friable asbestos products in 1973 and issued a ban in 1978 on manufacture, import, processing, and distribution of some asbestos-containing products and new uses of asbestos products.[36] The EPA is currently considering a proposed ban on on-going use of asbestos.[37] National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

[35] California Environmental Protection Agency. "Cortese List Data Resources." Accessed May 2, 2022. https://calepa.ca.gov/sitecleanup/corteselist/.
[36] United States Environmental Protection Agency. "EPA Actions to Protect the Public from Exposure to Asbestos." Accessed May 2, 2022. https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos
[37] Ibid.

CCR Title 8, Section 1532.1

The United States Consumer Product Safety Commission banned the use of lead-based paint in 1978. Removal of older structures with lead-based paint is subject to requirements outlined by the Cal/OSHA Lead in Construction Standard, CCR Title 8, Section 1532.1 during demolition activities. Requirements include employee training, employee air monitoring, and dust control. If lead-based paint is peeling, flaking, or blistered, it is required to be removed prior to demolition.

Regional and Local

Santa Rosa General Plan 2035

The following General Plan policies pertaining to hazards and hazardous materials are applicable to the project:

Policy	Description
NS-F-1	Require remediation and cleanup, and evaluate risk prior to reuse, in identified areas where hazardous materials and petroleum products have impacted soil or groundwater
NS-F-2	Require that hazardous materials used in business and industry are transported, handled, and stored in accordance with applicable federal, state, and local regulations.

3.9.1.2 *Existing Conditions*

Existing and Historic Uses

1027 McMinn Avenue and 1360 Burbank Avenue

The northerly parcels of the project site (APNs 125-252-002 and -004) is located in an area of Santa Rosa that is mainly residential with some vacant properties that are largely unused, though seem to have been actively farmed in past decades. The property appears to have been used for low impact agricultural uses in the form of orchards, farming, poultry and rural residential. Most of the surrounding residential development occurred during the 1940's and 1950's, but residential development has continued since. The subject site is among the largest properties in the area. The most northerly parcel on the site (1027 McMinn Avenue) formerly contained one residential building and one small shed at the northeast corner. Both structures have since been removed and only remnants such as foundations, building pads, driveways, refuse, fences, and underground utilities remain on-site. The remainder of the property is covered by annual grasses and trees. There are currently no agricultural uses on the site, although several old remnant walnut trees are scattered throughout the northern portion of the site. The parcel adjacent to the south (1360 Burbank Avenue) has been taken over by a forest of young oak trees and brush.

1370 Burbank Avenue

The portion of the project site, addressed as 1370 Burbank Avenue (APN 125-252-003) consists of a single parcel. The site was formerly developed with a residential property containing two single-family dwellings, a mobile home trailer and several associated outbuildings. At the time of the property inspection the dwellings were reported to be occupied and both were observed to be in fair

condition. A domestic water well east of the former dwellings supplied potable water to the project site. A concrete slab on grade foundation is located to the northeast of where the eastern dwelling was located. It was reported that the slab was the previous location of a carport that was removed by the owner of the property as an unpermitted structure. At the time of the property inspection the slab foundations remained at the site. In addition to the two former single-family dwellings on the site, a mobile home trailer was located to the east of the concrete slab. At the time of the property inspection, a portion of the western side of the trailer appeared to have been partially removed. The trailer appeared to be occupied by a tenant. The condition of the structure appeared to be poor.

A small greenhouse and bathroom structure were located to the south of the mobile home trailer. The greenhouse appeared to be used for the storage of household items. A septic system appeared to be located on the western side of where the bathroom structure was located. The use and condition of the septic system is unknown. A pump house was located to the east of the greenhouse. The pump house appeared to be a remnant of a water tower structure and consists of a wood framed structure with a slab on grade foundation. A second domestic water supply well was located within the pump house that also included a water pressure tank and pump controls. The well appeared to be in use but did not contain a sealed top. A water storage tank was located on the west side of the pump house structure that appears to be used for the storage of water.

A mound septic system is located on the eastern side of the parcel. A portion of Roseland Creek runs through the eastern side and adjacent to the southern border of the parcel. The creek bottom is lined with concrete. The remainder of the project site consists of grassland and limited landscaping, with several brush and minor debris piles present on the eastern side of the parcel, and gravel driveways.

Since the time of the property inspection, all structures on-site have been demolished and removed. Only at-grade or below-grade remnants remain such as concrete slabs and underground utilities.

1400 Burbank Avenue

The southernmost parcel, addressed as 1400 Burbank Avenue (APN 125-331-001), consists of three distinct areas: the riparian zone; the former residential area; and the pasture area. At the time of the site visit, only the residential area of the parcel, which contained a house, a barn, and gravel driveways was in use. The parcel was once used as an orchard, according to aerial photographs taken in 1953 and 1965 and topographic maps published in 1954 and 1968. The orchard occupied the pasture area between the former barn and the eastern site boundary. The wide spacing and large canopy size suggests that the orchard trees were walnuts. The structures on-site have since been demolished and removed.

On-Site Sources of Contamination

The project site is not identified in regulatory agency records or databases as having issues of environmental concern. Inspection of the property revealed no hazardous materials or wastes were observed or soil staining to indicate a release. There is no indication of the current or historic use of underground or aboveground fuel storage tanks at the project site. Prior residential structures on the site are known to have been constructed since the 1930s. The project site was also formerly used as orchards.

Groundwater Contamination

The project site is located within an area that has been shown to have domestic water supply wells that have been impacted by releases of halogenated volatile organic compounds (HVOCs) from historical business operation located to the north of the project site on the Sebastopol Road corridor. Contaminants consisting of volatile organic compounds were determined to be present in a number of water supply wells in the greater area to the north of the project site. There is documentation that the domestic water supply wells at the 1370 Burbank Avenue site were sampled as part of the area-wide investigation of environmental contaminants from releases at properties located along the Sebastopol Road corridor. Sampling of the domestic water supply wells indicated the presence of 1,2 Dichloroethane at concentrations of 1.0 and 1.4 ug/L. Subsequent sampling of the wells did not indicate the presence of these compounds. It appears that no long-term sampling of the wells has occurred and it appears that the wells are still in active use at the project site. The current condition of the wells is unknown; however, the prior concentrations of dichloroethane is a recognized environmental condition (REC).

Groundwater samples collected from the domestic well at 1400 Burbank Avenue in 2010 did not contain detectable concentrations of petroleum hydrocarbons or Halogenated Volatile Organic Compounds (HVOCs).

Other Sources of Contamination

A refuse dump at 1400 Burbank Avenue on the northwest side of Roseland Creek and north of the former house contained glass containers and household debris including some automotive parts. No evidence of recent dumping was noted; however, the refuse dump was determined to be a potential source of hazardous substances.

Off-Site Sources of Contamination

Neighboring Properties

An Environmental Data Resources, Inc. (EDR) search of public agency records at the federal, state, and local levels for cases which could impact the site, including SLIC and Envirostor was completed. The results are provided below.

SLIC

This database is considered a California State ASTM supplemental database. SLIC stands for Spills, Leaks, Investigations and Cleanups database. The SLIC program is designed to protect and restore water quality from spills, leaks, and similar discharges. The SLIC program has several components at the North Coast Regional Water Quality Control Board: (1) complaint response, (2) non-permitted discharge investigations, (3) site cleanups under the oversight of the Water Board, (4) site cleanups pursuant to methods analogous to procedures in the Resource Conservation and Recovery Act, and (5) cleanups performed by redevelopment agencies. In some cases, the Regional Water Board oversight costs are recovered from responsible parties.

Envirostor

The Department of Toxic Substances Control's (DTSC's) Site Mitigation and Brownfields Reuse Program's (SMBRP's) Envirostor database identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes the following site types: Federal Superfund sites (National Priorities List [NPL]); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. A review of the Envirostor list, as provided by EDR, revealed that there are 17 Envirostor sites within approximately one mile of the property. The Leaking Underground Storage Tank (LUST) Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data originates from the State Water Resources Control Board Leaking Underground Storage Tank Information System. A review of the LUST list as provided by EDR revealed there are 34 LUST sites within approximately 0.5 mile of the property, ten of which were open or unresolved at that time.

Other Hazards

Airports

The Charles M. Schulz-Sonoma County Airport is located approximately 10 miles northwest of the project site. The project site is not within the Airport Influence Area (AIA) for the Sonoma County Airport.

Wildland Fire Hazards

According to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone Map, the project site is not located in a fire hazard zone or the Wildland Urban Interface.

3.9.2 Impact Discussion

For the purpose of determining the significance of the project's impact on hazards and hazardous materials, would the project:

1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
2) 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?
3) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
4) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
5) 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, result in a safety hazard or excessive noise for people residing or working in the project area?

6) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
7) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

3.9.2.1 *Project Impacts*

Impact HAZ-1:	The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **(Less than Significant Impact)**

The proposed project is a community park consisting of grassland, oak woodland and riparian habitats, with amenities such as trails, BBQ/picnic areas, community gardens, outdoor play areas, a nature center, restrooms and parking areas. There will be minimal transport, use and disposal of hazardous materials on the site. Chemicals used on the site would include typical landscape maintenance and cleaning products, with minimal storage of these materials on-site. **(Less Than Significant Impact)**

Impact HAZ-2:	The project would not 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 with implementation of mitigation. **(Less than Significant Impact with Mitigation Incorporated)**

Several Phase I Environmental Site Assessments (ESAs) have been prepared for different parcels on the project site. The project site is not identified in any of the regulatory agency records or database research contained in these reports as having issues of environmental concern. At the time of the property inspections no hazardous materials or wastes were observed or soil staining to indicate a release. There is no indication of the current or historic use of underground or aboveground fuel storage tanks at the project site.

There are, however, a number of identified sites in the greater surrounding area of the project site that have documented releases of contaminants to soil and groundwater. Many of these sites have been fully investigated and closed with regulatory agency oversight and direction. There are still active investigation and remedial activities at several of the identified properties. All of these sites are located a significant distance from the project site and there is no indication that contamination from these properties impacts the project site. Based on a review of available information regarding the project site and properties in the surrounding area the threat of vapor intrusion at the project site is seen as unlikely.

Soil Sampling

A refuse dump on the northwest side of Roseland Creek and north of the former house at 1400 Burbank Avenue presents a material threat of a potential release of hazardous substances. In order to determine whether there was any contamination resulting from the refuse dump, and also because the

property was formerly used for agricultural purposes, a limited Phase II Environmental Site Assessment was conducted on the property by *ATC*. A copy of the Phase II report is included in Appendix H.

Soil samples were collected from the northern and southern portions of the project site, and tested for pesticides, lead and arsenic. However, the area of the reported refuse dump was inaccessible due to vegetation overgrowth at the time of the sampling (June 2018) and no soil samples were collected from this location. For this reason, the testing excluded hazardous substances and petroleum products.

The testing results showed detections were reported for pesticides, lead and arsenic. ATC compared detections of the analytes to SWRCB Region 2 Tier II Environmental Screening Levels (ESLs). Table S-1 Direct Exposure Human Health Risk Levels; Residential, Shallow Soil Exposure). The following are the constituents detected and their applicable ESLs:

- Chlordane – Max Conc. 0.061 mg/kg; ESL 0.48 mg/kg (no exceedances)
- 4,4'-DDD – Max Conc. 0.020 mg/kg; ESL 2.7 mg/kg (no exceedances)
- 4,4'-DDE – Max Conc. 0.021 mg/kg; ESL 1.9 mg/kg (no exceedances)
- 4,4'-DDT – Max Conc. 0.048 mg/kg; ESL 1.9 mg/kg (no exceedances)
- Dieldrin – Max Conc. 0.013 mg/kg; ESL 0.038 mg/kg (no exceedances)
- Lead – Max Conc. 120 mg/kg; ESL 80 mg/kg (2 exceedances)
- Arsenic – Max Conc. 5.2 mg/kg; ESL 0.067 mg/kg (all analyses exceeded)

The samples collected from former orchard areas were considered to be representative of the site. Based on the absence of ESL exceedances for pesticides, no elevated concentrations of pesticides were found in site soils. Additionally, although all samples exceeded the arsenic ESL, it is well documented that concentrations of this magnitude are within typical background concentrations for Northern California. Therefore, no additional action is required with respect to arsenic concentrations.

Reported concentrations of lead exceeding the ESL were detected in two samples collected adjacent to previous structures at the site. These elevated lead concentrations are most likely the result of lead-based paint debris falling from these structures. The soil impacted with elevated lead concentrations is expected to be confined to the top one foot of soil in the vicinity of the structures.

Impact HAZ-2: The presence of lead in soils adjacent to previous structures on the site and a reported refuse dump on the northwest side of Roseland Creek containing glass containers and household debris including automobile parts could present a material threat of a potential release of hazardous substances. **(Significant Impact)**

Mitigation Measures: Implementation of the following mitigation measures will reduce potential hazardous materials impacts to less than significant levels.

MM HAZ-2.1: Any debris or soil containing lead-based paint or coatings or known to contain elevated lead concentrations would be disposed of at landfills that meet acceptance criteria for the waste being disposed.

Soil sampling and analytical testing shall be performed on that portion of the site identified as the "refuse dump" in the report entitled Phase I Environmental Site Assessment, Roseland Creek Community Park, 1400 Burbank Avenue, APN 125-331-001, Santa Rosa, California, prepared by Econ, dated February 19, 2010. If hazardous materials are detected at levels that exceed regulatory thresholds, the extent of the contamination shall be identified, and recommendations for a Health and Safety Plan (HSP), Soil Management Plan (SMP), and methods for a cleanup shall be implemented, as applicable. This work shall be performed under the oversight of a regulatory agency such as the Sonoma County Department of Environmental Health and Safety or the Department of Toxic Substances Control.

Implementation of MM HAZ-2.1 would ensure that potentially hazardous materials would be properly handled so as to protect construction workers from being adversely affected or otherwise exposed to dangerous levels of hazardous materials at the project site during construction. **(Less Than Significant with Mitigation Incorporated)**

Impact HAZ-3:	The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. **(Less than Significant Impact)**

Roseland Creek Elementary School is across Burbank Avenue from the project site. Future park users would not use hazardous materials on-site, which would therefore not impact the school. Implementation of the proposed project would therefore not result in the use or emission of significant quantities of hazardous materials that would have an impact on Roseland Creek Elementary School. **(Less Than Significant Impact)**

Impact HAZ-4:	The project would not 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, create a significant hazard to the public or the environment. **(Less than Significant Impact)**

As discussed above, the project site is not identified in any regulatory agency records or databases as having issues of environmental concern. Most of the off-site sources of contamination listed in the SLIC and Envirostor databases are not considered a likely environmental risk to the subject property due to one or more of the following factors: status of case, distance from the property, groundwater flow relative to the property or definition of contaminant plume. Most of the sites identified are cross gradient or not directly up gradient from the site.

The remaining sites with potential for environmental impact to the project site are discussed below. For ease of discussion these should be divided into, first, those many sites along Sebastopol Road and, second, the McMinn Avenue Superfund Area which is discussed as a whole.

Sebastopol Road Sites

There are approximately 50 closed and active sites of past contamination of soil, water, or groundwater along Sebastopol Road between 8 Sebastopol Road in the east and the intersection with Stony Point Road in the west (2000 Sebastopol Road). These are a diverse group of sites with different contaminants of concern, different probable directions of groundwater flow, different owners, different age and clean-up status, etc. Many have completed the required remediation, while the scope of contamination has not been defined for others. Many others are far enough from the project site to be outside of the reporting requirements for this report. In spite of this diversity, the following important generalizations apply.

- All of the sites are at least ¼ mile from the project site.
- All of the sites are within 100 to 200 feet of Sebastopol Road and no sites are mapped between this cluster of contamination and the project site.
- The sites are approximately midway between Roseland Creek and Santa Rosa Creek. Groundwater is often higher than the water level in these creeks. Therefore, groundwater flow may, for some of the year, be diverted to the nearer of these creeks. Many sites along the east end of Sebastopol Road are closer to Santa Rosa Creek. This may have a significant effect on the groundwater flow direction which may commonly be west and northwest in that area. This being the case, the eastern sites are actually strongly cross-gradient relative to the project site instead of up-gradient.
- The sites along the western portion of Sebastopol Road are located due north or northwest and are therefore reasonably classified as strongly cross-gradient relative to the project site.
- Undetermined sources of past contamination in the area are generally suspected.

Based on these factors, it is unlikely that any of the sites listed along Sebastopol Road can be classified as an REC relative to the project site.

McMinn Avenue State Superfund Area

The McMinn Avenue Superfund area represents an area of study extending from Highway 101 on the east to Stony Point Road on the west, and Highway 12 on the north to Roseland Creek on the south. This area was designated as a Superfund site by the California Department of Toxic Substances Control in 1984 after petroleum and solvent contaminants were detected in several domestic water supply wells in the area. A variety of investigations have been conducted in this area since the listing as a Superfund site in 1984. These investigations include domestic well sampling events, monitoring well sampling events, soil gas and indoor air surveys and contamination source identification. Many sites within the McMinn Avenue Superfund Area are undergoing investigation and cleanup activities under the direction of the North Coast Regional Water Quality Control Board, and several of these sites have been issued closure notices that require no further action. Investigation is on-going at the remaining sites.

A majority of the sites located within the McMinn Avenue Superfund area are located approximately 0.75 miles northeast to northwest of the project site on the Sebastopol Avenue corridor. Groundwater in the Superfund area has been calculated to flow generally in a southwesterly direction. From a review of available information there is no indication that the impacts from the McMinn Avenue Superfund area have impacted the project site.

The project site is not identified in any regulatory agency records or databases as having issues of environmental concern, and most of the off-site sources of contamination listed in the SLIC and Envirostor databases are not considered a likely environmental risk to the subject property. **(Less Than Significant Impact)**

Impact HAZ-5:	The project would not be 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. **(No Impact)**

The proposed project site is approximately 10 miles southeast of the Charles M. Schulz-Sonoma County Airport and is not located within the Airport Influence Area (AIA). The project would, therefore, not result in any airport-related safety hazards to people working or residing on the project site. **(No Impact)**

Impact HAZ-6:	The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. **(No Impact)**

The project would not interfere with an adopted emergency response plan or emergency evacuation plan. The park would provide access for emergency vehicles via Burbank Avenue. **(No Impact)**

Impact HAZ-7:	The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. **(Less than Significant Impact)**

The project site is not located in a fire hazard zone or the Wildland Urban Interface. Therefore, the risk of loss, injury or death involving wildland fires would be less than significant. **(Less Than Significant Impact)**

3.9.2.2 *Cumulative Impacts*

Impact HAZ-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant hazards and hazardous materials impact. **(Less than Significant Cumulative Impact)**

Projects in the cumulative scenario could be located on properties where hazardous materials may have been stored, used, and/or transported. These hazardous materials (such as gasoline, oil, propane, and various chemicals in manufacturing) may have been stored on these sites in aboveground or underground tanks. Storage tanks can leak, often resulting in soil and/or groundwater contamination. If groundwater is affected, it can impact properties downgradient of the spill.

Cumulative scenario projects could also be located on sites that were used for agricultural purposes in the past and chemicals such as pesticides and fertilizers may have been used. The use of these chemicals on agricultural properties can result in widespread residual soil contamination. In addition,

development of some of the sites would require demolition of existing buildings that may contain ACMs and/or lead-based paint. Demolition of these structures could expose construction workers or other persons in the vicinity to harmful levels of asbestos or lead.

Based on these conditions, which are present on most cumulative project sites to varying degrees, impacts could occur in the cumulative scenario as a result of exposure of residents and/or workers to substances that have been shown to adversely affect health. For all cumulative scenario projects, mitigation measures will be implemented as a condition of approval to lessen risks associated with exposure to hazardous materials. Further, adherence to applicable existing local, state, and federal laws and regulations related to hazardous materials would lessen the potential for cumulative impacts.

If chemical releases have occurred in the cumulative scenario, and depending upon the extent of the release, contaminated soils could be excavated and transported to appropriate landfills or treated on-site. If groundwater is affected, remediation and ongoing groundwater sampling both on the site and on surrounding downgradient properties could be warranted. Finally, determining the extent of asbestos and lead-based paint contamination would also be required prior to building demolition and site grading and, if present, such substances would be handled and disposed of in a manner that minimizes human exposure. Therefore, cumulative projects, including the proposed project, would not result in significant cumulative hazardous materials impacts. **(Less than Significant Cumulative Impact)**

3.10 HYDROLOGY AND WATER QUALITY

3.10.1 Environmental Setting

3.10.1.1 *Regulatory Framework*

Federal and State

The federal Clean Water Act and California's Porter-Cologne Water Quality Control Act are the primary laws related to water quality in California. Regulations set forth by the Environmental Protection Agency (EPA) and the State Water Resources Control Board (SWRCB) have been developed to fulfill the requirements of this legislation. EPA regulations include the National Pollutant Discharge Elimination System (NPDES) permit program, which controls sources that discharge pollutants into the waters of the United States (e.g., streams, lakes, bays, etc.). These regulations are implemented at the regional level by the Regional Water Quality Control Boards (RWQCBs). The project site is within the jurisdiction of the North Coast RWQCB.

Under Section 303(d) of the Clean Water Act, states are required to identify impaired surface water bodies and develop total maximum daily loads (TMDLs) for contaminants of concern.[38] The TMDL is the quantity of pollutant that can be safely assimilated by a water body without violating water quality standards. Listing of a water body as impaired does not necessarily suggest that the water body cannot support the beneficial uses; rather, the intent is to identify the water body as requiring future development of a TMDL to maintain water quality and reduce the potential for future water quality degradation. The Russian River watershed in the vicinity of the project site is listed by the U.S. Environmental Protection Agency as an impaired water body.

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) established the National Flood Insurance Program (NFIP) to reduce impacts of flooding on private and public properties. The program provides subsidized flood insurance to communities that comply with FEMA regulations protecting development in floodplains. As part of the program, FEMA publishes Flood Insurance Rate Maps (FIRMs) that identify Special Flood Hazard Areas (SFHAs). An SFHA is an area that would be inundated by the one-percent annual chance flood, which is also referred to as the base flood or 100-year flood.

[38] California State Water Resources Control Board. "Total Maximum Daily Load Program." 2022. http://www.swrcb.ca.gov/water_issues/programs/tmdl/303d_lists2006_approved.shtml. Accessed May 12, 2022.

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a Notice of Intent (NOI) must be filed with the RWQCB by the project sponsor, and a Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction and filed with the RWQCB by the project sponsor. The Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

Regional and Local

Phase I Program

There is one Phase I MS4 permit in the North Coast Region, Order No. R1-2015-0030. This permit regulates the discharge of pollutants from the City of Santa Rosa, as well as portions of unincorporated County of Sonoma, Sonoma Water, the City of Cotati, the City of Cloverdale, the City of Healdsburg, the City of Rohnert Park, the City of Sebastopol, the City of Ukiah, and the Town of Windsor.

The Phase 1 MS4 permit (Permit) mandates that the co-permittees use their planning and development review authority to require that stormwater post-construction Best Management Practices (BMPs) be included in private and public new and redevelopment projects that create or replace 10,000 square feet or more of impervious surface.

The Permit requires regulated projects to incorporate Low Impact Development (LID) practices, which are intended to reduce runoff and mimic a site's predevelopment hydrology by minimizing disturbed areas and impervious cover and then infiltrating, storing, detaining, evapotranspiring, and/or biotreating stormwater runoff close to its source. LID employs principles such as preserving and recreating natural landscape features and minimizing imperviousness to create functional and appealing site drainage that treats stormwater as a resource, rather than a waste product. Practices used to adhere to these LID principles include measures such as rain barrels and cisterns, green roofs, permeable pavement, preserving undeveloped open space, and biotreatment through rain gardens, bioretention units, bioswales, and planter/tree boxes. The Permit also requires that stormwater treatment measures are properly installed, operated and maintained.

Hydromodification is a change in stormwater runoff characteristics from a watershed caused by changes in land use conditions (i.e., urbanization) that alter the natural cycling of water. Changes in land use conditions can cause runoff volumes and velocity to increase which can result in a decrease in natural vegetation, changing of river/creek bank grades, soil compaction, and the creation of new drainages. In addition to runoff water quality controls, the Permit requires regulated projects to include measures to control hydromodification impacts where the project would otherwise cause increased erosion, silt pollutant generation, or other adverse impacts to local rivers and creeks.

Construction Dewatering Waste Discharge Requirements

Each of the RWQCBs regulate construction dewatering discharges to storm drains or surface waters within its Region under the NPDES program and Waste Discharge Requirements.

Non-Storm Water Best Management Practices (BMP) Plans

Each Co-Permittee, including Santa Rosa, has developed a draft Non-Storm Water BMP Plan (BMP Plan) to eliminate or minimize the discharge of pollutants to the MS4 related to select types of discharges. The discharges are allowable non-storm water discharges, provided they meet all required conditions in the MS4 Order, are not a significant source of pollutants, and are conducted as specified in the Co-Permittee's approved BMP Plan.[39]

3.10.1.2 *Existing Conditions*

Drainage Patterns

Topography at the site is nearly flat with a very slight slope to the southwest. Roseland Creek, an intermittent stream that is a tributary of the Laguna de Santa Rosa runs through the site from the northeast to the southwest. The upper reach of the creek, where the creek enters the project site, is approximately eight feet wide and has a concrete slab bed for approximately 400 linear feet. The lower reach (western portion) of the stream has a more natural channel composed of rock and cobble mixed with sands and silts, and contains a backflow channel which supports a riparian wetland near Burbank Avenue at the western edge of the site.

Wetlands and Waters of the U.S.

The project site contains 0.09 acre of riparian wetlands in-line and directly adjacent to Roseland Creek. The riparian wetland is located in the downstream portion of Roseland Creek, adjacent to Burbank Avenue where the stream flows off of the site through a box culvert underneath Burbank Avenue. The culvert appears to be functioning as a sediment trap which backs up stream flows enough to cause wetland conditions below the OHWM, in-line with the stream. Standing water and wetland vegetation was also observed in an approximately nine-foot-wide backflow, scour channel on the north side of the main creek channel. The approximately 0.35-acre segment of Roseland Creek within the project site is classified as an intermittent stream. Areas mapped as intermittent stream and riparian wetland are likely considered jurisdictional under Section 404 of the Clean Water Act and Section 1602 of the California Fish and Game Code.

Flooding

Under the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973, the Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. As part of the NFIP, FEMA publishes Flood Insurance Rate Maps that identify flood hazard zones within a community.

[39] North Coast Regional Water Quality Control Board. "NPDES Stormwater, Municipal Program." September 8, 2021. https://www.waterboards.ca.gov/northcoast/water_issues/programs/npdes_stormwater/. Accessed May 12, 2022.

Based on the FEMA Flood Insurance Maps (Map 06097C0736F), portions of the project site are located within the 100-year flood plain (Zone AE – Special Flood Hazard Areas Subject to Inundation by the 1% Annual Chance Flood).[40] The areas of the project site that are affected include the eastern half of the northerly two parcels, primarily north of Roseland Creek and the westerly end of 1400 Burbank Avenue on the north and south sides of Roseland Creek.

3.10.2 Impact Discussion

For the purpose of determining the significance of the project's impact on hydrology and water quality, would the project:

1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
3) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    - result in substantial erosion or siltation on- or off-site;
    - substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
    - create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
    - impede or redirect flood flows?
4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

3.10.2.1 *Project Impacts*

Impact HYD-1:	The project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. **(Less than Significant Impact)**

Stormwater runoff from impervious surfaces such as rooftops, paved streets or parking lots can carry with it pollutants such as oil, pesticides, herbicides, sediment, trash, nutrients, bacteria and metals. The runoff can then drain directly into a local stream, lake or bay. Urban areas commonly include large impervious cover which contributes to an increase in runoff flow, velocity and volume. As a result, streams are hydrologically impacted through streambed and channel scouring, instream sedimentation and loss of aquatic and riparian habitat. In addition to hydrological impacts, large

[40] Federal Emergency Management Agency. Flood Insurance Rate Map. Map Number 06097C0736F. October 16, 2012. Accessed May 12, 2022. https://msc.fema.gov/portal/home

amounts of impervious cover contribute to greater pollutant loading, resulting in turbid water, nutrient enrichment, bacterial contamination, and increased temperature and trash.

Construction Water Quality Impacts

Construction of the proposed park improvements would involve minor excavation and grading activities at the project site. These construction activities could degrade water quality in local creeks, Roseland Creek in particular, because stormwater runoff from the site drains into roadside swales along Burbank Avenue that discharge directly into Roseland Creek. Construction activities would generate dust, sediment, litter, oil, paint, and other pollutants that could temporarily contaminate runoff from the site.

The following project-specific measures, based on RWQCB Best Management Practices (BMPs), have been included in the project to reduce construction-related water quality impacts. All measures will be implemented prior to the start of earthmoving activities on-site and will continue until the construction is complete.

- Burlap bags filled with drain rock or similar BMPs shall be installed around storm drains to route sediment and other debris away from the drains.
- Earthmoving or other dust-producing activities shall be suspended during periods of high winds.
- All exposed or disturbed soil surfaces shall be watered at least twice daily to control dust as necessary.
- Stockpiles of soil or other materials that can be blown by the wind shall be watered or covered.
- All trucks hauling soil, sand, and other loose materials shall be required to cover all trucks or maintain at least two feet of freeboard.
- All paved access roads, parking areas, staging areas and residential streets adjacent to the construction sites shall be swept daily (with water sweepers).
- Vegetation in disturbed areas shall be replanted as quickly as possible.
- All unpaved entrances to the site shall be filled with rock to knock mud from truck tires prior to entering City streets. A tire wash system may also be employed at the request of the City.
- Prior to construction grading, the City will file an NOI to comply with the General Construction Permit and prepare a SWPPP which addresses measures that would be included in the project to minimize and control construction and post-construction runoff. Measures will include, but are not limited to, the aforementioned RWQCB BMPs.
- The certified SWPPP will be posted at the project site and will be updated to reflect current site conditions.
- When construction is complete, a Notice of Termination (NOT) for the General Permit for Construction will be filed with the RWQCB and the City of Santa Rosa. The NOT will document that all elements of the SWPPP have been executed, construction materials and waste have been properly disposed of, and a post-construction storm water management plan is in place as described in the SWPPP for the site.

Post-Construction Water Quality Impacts

Implementation of the proposed project would result in a slight increase in stormwater runoff due to an increase in impermeable surfaces compared to existing conditions. Runoff from the proposed rooftops, hardscape (sports court, picnic areas) and parking areas could carry fine sediment, grease, oil, and trace amounts of heavy metals into natural drainages and ultimately into the local creeks. Runoff from landscaping could carry pesticides, herbicides, and fertilizers, as well. Although the amounts of these pollutants ultimately discharged into the waterways are unknown, over time they could accumulate and be substantial.

The proposed project will add or replace more than 10,000 square feet of impervious surfaces; thus it must conform to the site design and treatment requirements of the Phase I MS4 Permit. Plans will be certified by engineers to ensure incorporation of appropriate and effective site design, source control, and Low Impact Development (LID) treatment controls to reduce post-construction runoff volumes and remove pollutants from runoff entering the storm drainage system. The project will be required to maintain all post-construction treatment control measures throughout the life of the project.

The following measures, based on RWQCB BMPs and City requirements, are included in the proposed project to ensure compliance with NPDES permit requirements to reduce post-construction water quality impacts.

Required Post-Construction Measures

- All post-construction Treatment Control Measures (TCMs) will be installed, operated, and maintained by qualified personnel. On-site inlets will be cleaned out at a minimum of once per year, prior to the wet season.
- The property owner/site manager will keep a maintenance and inspection schedule and record to ensure the TCMs continue to operate effectively for the life of the project. Copies of the schedule and record must be made available for inspection on-site or at the City's Recreation and Parks Department.

With implementation of the required construction and post-construction BMPs and TCMs, the project would not violate any adopted water quality standards or waste discharge requirements. Installation and maintenance of the proposed stormwater treatment systems would result in a less than significant impact on water quality. **(Less Than Significant Impact)**

Impact HYD-2:	The project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. **(Less than Significant Impact)**

The project site is not located within an area designated by the Santa Rosa Plain Groundwater Sustainability Agency as a major natural recharge area.[41]. Implementation of the proposed

[41] Santa Rosa Plain Groundwater Sustainability Agency. *Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin. Section 2 – Plan Area, Figure 2-9 County of Sonoma Groundwater Availability Classifications.* January 2022.

community park project would not substantially increase the amount of impervious surface area on the site, or otherwise interfere with the infiltration of precipitation, nor would it interrupt surface or subsurface flow. Therefore, the project would not deplete or interfere with groundwater recharge.

There are two existing water wells located on the project site. Both will be abandoned and/or destroyed in conformance with the County of Sonoma and RWQCB requirements, as they would not be proposed to be used for the project. As no new wells are proposed with the project, there would be no resulting reduction in groundwater supplies in the project area. **(Less Than Significant Impact)**

Impact HYD-3:	The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows. **(Less than Significant Impact)**

The project does not propose substantial amounts of grading or alteration of existing natural contours or drainage courses on the site, and would therefore not alter the existing drainage pattern of the site or area. Potential erosion and/or siltation impacts to Roseland Creek and other off-site waterways would be reduced to less than significant levels by implementation of construction BMPs and installation and maintenance of post-construction site design, source control and treatment control measures. The proposed community park project may create an increase in impervious surface area on the site due to proposed parking lots, pathways, structures, and sport court, which in turn would generate a slight increase in stormwater runoff over the existing condition. However, the proposed park with implementation of post-construction LID-based stormwater runoff TCMs would reduce the volume and pollutant load of project-generated runoff from the site. **(Less than Significant Impact)**

Impact HYD-4:	The project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. **(Less than Significant Impact)**

The majority of the mapped 100-year flood hazard zone on the project site covers existing riparian, oak woodland and grassland habitat areas upon which no structures or group facilities are proposed. The topography of the project site is relatively flat, and the location is far from the ocean or any major lake or reservoir. Therefore, the project would not risk release of pollutants due to inundation in flood hazard, tsunami, or seiche zones. **(Less Than Significant Impact)**

Impact HYD-5:	The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **(Less than Significant Impact)**

The project would comply with all federal, state, regional, and local water quality control and groundwater management plans. The project would be consistent with all applicable plans pertaining to water quality and groundwater management. **(Less than Significant Impact)**

3.10.2.2 *Cumulative Impacts*

Impact HYD-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant hydrology and water quality impact. **(Less than Significant Cumulative Impact)**

Cumulative projects would also be required to comply with the NPDES and the Phase I MS4 Permit. Projects creating or replacing over 10,000 sf of impervious surfaces would also be subject to the implementation of LID treatment controls. Therefore, the projects listed in Table 3.0-1 would be required to implement similar erosion-control BMPs during project construction and stormwater treatment measures for post-construction water quality impacts.

Given that the cumulative projects are within the project vicinity, they would have similar topography and hydrologic conditions. The cumulative projects would also not be located in an area designated by the Santa Rosa Plain Groundwater Sustainability Agency as a major natural recharge area.[42] Based on recent improvements to a culvert under Stony Point Road, a Letter of Map Revision (LOMR) has been issued by FEMA that reduced the Roseland Creek floodplain in the vicinity of some of the cumulative projects.[43] The cumulative projects are required to incorporate LID treatment controls which may include bioretention areas to limit stormwater runoff. Based on the location and nature of the cumulative projects and existing regulatory requirements, the cumulative projects would not increase the amount of surface runoff such that flooding would result or increase the risk of pollutant release due to a flood hazard. No hydrology and water quality impacts would result from the cumulative projects and, therefore, the proposed project would not contribute to a cumulatively significant impact. **(Less than Significant Cumulative Impact)**

[42] Ibid.
[43] FEMA. Letter of Map Revision 22-09-0905P-060375. May 4, 2023. https://map1.msc.fema.gov/mipdata/22-09-0905P-060375.pdf?LOC=d6d2290cfff9d57e3aba860480ca5f4b

3.11 LAND USE AND PLANNING

3.11.1 Environmental Setting

3.11.1.1 *Existing Conditions*

The project site is located in the Roseland neighborhood, an area in southwestern Santa Rosa that was incorporated into the City in November 2017. Roseland is a predominantly single-family residential neighborhood, with some larger undeveloped properties included. Roseland Creek runs in a southwesterly direction through the neighborhood. The 19.49-acre project site consists of four parcels of land, three of which were previously developed with single-family residences. It is bounded by McMinn Avenue on the east, and by Burbank Avenue, a designated Scenic Roadway, on the west.

The area surrounding the project site contains mostly residential uses, with single-family residences to the north, east and west, and multiple family buildings also on the east. There is an elementary school located across Burbank Avenue from the site on the west, and a single-family residence and storage buildings adjacent to the south side of the site.

General Plan Designation and Zoning

In the City's General Plan, the project site (1370 Burbank Avenue) is designated as *Medium - Density Residential* (8.0-18.0 units per acre). The *Medium – Density Residential* designation permits a range of housing types, including single family attached and multifamily developments, and is intended for specific areas where higher density is appropriate. The project site is also identified as *Parks/Recreation* and a *Proposed Community Park*. The *Community Park* designation includes land with full public access intended to provide recreation opportunities beyond those supplied by neighborhood parks. Community parks are larger in scale than neighborhood parks (generally 10-25 acres in size). They can be designed to provide spaces for organized sports, larger group events, children's play areas, several unique features, pathways and natural areas, community gardens and recreational facilities such as community centers. The city aims to provide access to community parks within one mile of residential neighborhoods.

The City of Santa Rosa Zoning Ordinance designates the project site as *Open Space – Recreation* (*OSR-SR*) and *Multi Family Residential* (*R-3-18-SR*) in a Scenic Road combining district (*-SR*). The Scenic Road combining district is intended to enhance and preserve the natural and constructed features that contribute to the character of scenic roads. Natural and constructed features include trees, rock walls, view corridors, road configuration and tree canopy. Any land use normally allowed in the primary zoning district (*Multi-family Residential*) may be allowed within the -SR combining district, subject to the land use permit requirements of the primary district.

3.11.2 Impact Discussion

For the purpose of determining the significance of the project's impact on land use and planning, would the project:

1) Physically divide an established community?

2) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

3.11.2.1 *Project Impacts*

Impact LU-1:	The project would not physically divide an established community. **(Less than Significant Impact)**

The project site is currently located in a suburban area with residential development located to the north, east, and south, and Roseland Creek Elementary School located to the west. The layout and design of the park does not include any features that would physically divide the community (e.g., impeding roadways or sidewalks). Therefore, the proposed park project would not physically divide an established community. **(Less Than Significant Impact)**

Impact LU-2:	The project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **(Less than Significant Impact)**

General Plan and Zoning

According to the City's General Plan, a portion of the project site (1370 Burbank Avenue) is designated as *Medium - Density Residential*, which allows for a minimum density of 8.0 units per acre. The project site is also identified as a proposed *Community Park*. Therefore, the project is consistent with the General Plan designation for the majority of the site and a park is an allowable use on properties designated for residential use. The General Plan designation and zoning for the property at 1370 Burbank Avenue could be amended and rezoned to *Community Park*; however, it is not required for implementation of the project. The proposed project would not conflict with any other applicable land use plans, policies, or regulations. **(Less Than Significant Impact)**

Sonoma County Agricultural Preservation and Open Space District Conservation Easement

Development of the proposed park on the project site would adhere to existing conservation easements on 1027 McMinn Avenue, and 1360 and 1400 Burbank Avenue that are held by the Sonoma County Agricultural Preservation and Open Space District (SCAPOSD). A conservation easement would also likely be granted for 1370 Burbank Avenue. The conservation easement restricts development on the northerly two parcels to the development of minor structures and improvements in connection with low-intensity and educational uses. Impervious surfaces on the northerly parcels are also restricted to five percent of the total easement area. The conservation easement for 1400 Burbank Avenue limits structures and improvements within the "Natural Area" along Roseland Creek to trails and associated bridges which may provide emergency vehicle access. The easement also designates an "Oak Preservation Area" that allows for improvements in connection with low-intensity recreational and educational uses. Per the existing conservation easement for 1400 Burbank Avenue, park improvements shall not result in impervious surfaces of more than 20 percent on this property. The SCAPOSD would review and approve the proposed

Master Plan prior to implementation. The currently proposed Master Plan was designed to adhere to and would not conflict with the provisions of the existing conservation easements on the project site. **(Less Than Significant Impact)**

3.11.2.2 *Cumulative Impacts*

Impact LU-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant land use and planning impact. **(Less than Significant Cumulative Impact)**

Cumulative scenario projects within the City are subject to General Plan goals, policies, and action statements that require appropriate buffers, edges, and transition areas between land uses. In addition, the project site and other cumulative projects identified in Table 3.0-1 would not physically divide a community. Thus, the project would not contribute to a cumulative impact related to physically dividing an established community.

Cumulative scenario projects in the City of Santa Rosa would go through the City development review processes. In addition, projects would be analyzed for conformance with applicable policies adopted for the purpose of avoiding or mitigating an environmental impact through the CEQA review process. The project, therefore, in combination with cumulative development, would not result in significant cumulative impacts due to policy conflicts. **(Less than Significant Cumulative Impact)**

3.12 MINERAL RESOURCES

3.12.1 Environmental Setting

3.12.1.1 *Regulatory Framework*

State

Surface Mining and Reclamation Act

The Surface Mining and Reclamation Act (SMARA) was enacted by the California legislature in 1975 to address the need for a continuing supply of mineral resources, and to prevent or minimize the negative impacts of surface mining to public health, property, and the environment. As mandated under SMARA, the State Geologist has designated mineral land classifications in order to help identify and protect mineral resources in areas within the state subject to urban expansion or other irreversible land uses which would preclude mineral extraction. SMARA also allowed the State Mining and Geology Board (SMGB), after receiving classification information from the State Geologist, to designate lands containing mineral deposits of regional or statewide significance.

3.12.1.2 *Existing Conditions*

The project site is not located in an area containing known mineral resources.

3.12.2 Impact Discussion

For the purpose of determining the significance of the project's impact on mineral resources, would the project:

- Result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state?
- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

3.12.2.1 *Project Impacts*

Impact MIN-1:	The project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. **(No Impact)**

According to the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Projects Environmental Impact Report, no minerals have been found on or adjacent to the project site. Therefore, the project would not result in an impact on mineral resources. **(No Impact)**

Impact MIN-2:	The project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. **(No Impact)**

See discussion under Impact MIN-1. **(No Impact)**

3.12.2.2 *Cumulative Impacts*

Impact MIN-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant mineral resources impact. **(No Cumulative Impact)**

The project would not have any impacts on mineral resources and, therefore, would not have the potential to contribute to a cumulatively significant mineral resources impact. **(No Cumulative Impact)**

3.13 NOISE

3.13.1 Environmental Setting

3.13.1.1 *Background Information*

Noise

Factors that influence sound as it is perceived by the human ear, include the actual level of sound, period of exposure, frequencies involved, and fluctuation in the noise level during exposure. Noise is measured on a decibel scale, which serves as an index of loudness. The zero on the decibel scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness. Because the human ear cannot hear all pitches or frequencies, sound levels are frequently adjusted or weighted to correspond to human hearing. This adjusted unit is known as the A-weighted decibel, or dBA.

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq}, DNL, or CNEL.[44] These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Construction Noise

Construction is a temporary source of noise impacting residences and businesses located near construction sites. Construction noise can be significant for short periods of time at any particular location and generates the highest noise levels during grading and excavation, with lower noise levels occurring during building construction. Large pieces of earth-moving equipment, such as graders, scrapers, and bulldozers, generate maximum noise levels of 90 to 95 dBA L_{max} at a distance of 50 feet. Typical hourly average construction-generated noise levels are approximately 81 to 88 dBA L_{eq} measured at a distance of 50 feet from the site during busy construction periods. Construction generated noise levels drop off at a rate of about six dBA per doubling of distance between the source and receptor. Shielding by buildings or terrain often result in lower construction noise levels at distant receptors.

Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Vibration amplitude can be quantified using Peak Particle Velocity (PPV), which is defined as the maximum instantaneous positive or negative peak of the vibration wave. PPV has been routinely used to measure and assess ground-borne construction vibration. Studies have shown that the

[44] L_{eq} is a measurement of average energy level intensity of noise over a given period of time. Day-Night Level (DNL) is a 24-hour average of noise levels, with a 10 dB penalty applied to noise occurring between 10:00 PM and 7:00 AM. Community Noise Equivalent Level (CNEL) includes an additional five dB applied to noise occurring between 7:00 PM and 10:00 PM. Where traffic noise predominates, the CNEL and DNL are typically within two dBA of the peak-hour L_{eq}.

threshold of perception for average persons is in the range of 0.008 to 0.012 inches/second (in/sec) PPV.

3.13.1.2 *Regulatory Framework*

Federal

Federal Transit Administration Vibration Limits

The Federal Transit Administration (FTA) has developed vibration impact assessment criteria for evaluating vibration impacts associated with transit projects. The FTA has proposed vibration impact criteria based on maximum overall levels for a single event. The impact criteria for groundborne vibration are shown in Table 3.13-1 below. These criteria can be applied to development projects in jurisdictions that lack vibration impact standards.

Table 3.13-1: Groundborne Vibration Impact Criteria

Land Use Category	Groundborne Vibration Impact Levels (VdB inch/sec)		
	Frequent Event	Occasional Events	Infrequent Events
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime use	75	78	83

Source: Federal Transit Administration. *Transit Noise and Vibration Assessment Manual.* September 2018.

Local

Santa Rosa General Plan 2035

The following General Plan policies pertaining to noise are applicable to the project:

Policy	Description
NS-B-3	Prevent new stationary and transportation noise sources from creating a nuisance in existing developed areas. Use a comprehensive program of noise prevention through planning and mitigation, and consider noise impacts as a crucial factor in project approval.
NS-B-5	Pursue measures to reduce noise impacts primarily through site planning. Engineering solution for noise mitigation, such as sound walls, are the least desirable alternative.
NS-B-6	Do not permit existing uses to generate new noises exceeding normally acceptable levels unless: these noises are mitigated to acceptable levels; or the activities are specifically exempted by the City Council on the bases of community health, safety, and welfare.

City of Santa Rosa Noise Ordinance

The City Municipal Code has a Noise Ordinance (Chapter 17-16). Section 17-16.030 sets criteria for base, or ambient noise levels to help determine if radios, musical instruments, machinery or equipment or other devices are creating a nuisance. The ordinance states "any noise level exceeding the ambient base level at the property line of any property by more than five decibels shall be deemed to be prima facie evidence of a violation of this section." The ambient base level for noise in residential areas varies from 55 dbA during daytime hours to 45 dbA during nighttime hours. The ordinance prohibits motor vehicle operations in such manner that a reasonable person of normal hearing sensitivity residing in the area is caused discomfort or annoyance.

3.13.1.3 *Existing Conditions*

The project site is bounded by single-family residences to the north, McMinn Avenue to the east, and Burbank Avenue to the west. There is an elementary school located across Burbank Avenue from the site on the west, and a single-family residence and storage buildings adjacent to the south side of the site. The noise environment on the project site results primarily from vehicular traffic along Burbank Avenue and McMinn Avenue. Existing ambient noise conditions resulting from traffic along Burbank Avenue are approximately 59.4 dBA L_{dn} at 75 feet from the roadway centerline.[45]

3.13.2 Impact Discussion

For the purpose of determining the significance of the project's impact on noise, would the project result in:

1) 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?
2) Generation of excessive groundborne vibration or groundborne noise levels?
3) 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?

3.13.2.1 *Project Impacts*

Impact NOI-1:	The project would not 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 with implementation of mitigation. **(Less than Significant Impact with Mitigation Incorporated)**

[45] City of Santa Rosa. *Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Draft Environmental Impact Report.* May 2016. Table 3.11-4, Existing Traffic Noise Levels.

Project Construction

Project implementation would result in intermittent short-term noise impacts resulting from construction-related activities. Per General Plan Policy NS-B-3, the City should mitigate noise sources, such as construction noise, that may create a nuisance in existing developed areas. The City of Santa Rosa does not establish noise level thresholds for construction activities. However, the Federal Transit Administration (FTA) identifies daytime construction noise limits of 80 dBA L_{eq} for residential uses in the *Transit Noise and Vibration Impact Assessment Manual.*[46]

Given the nature of the proposed project, one of the largest pieces of equipment that would be anticipated to be used throughout the project site would be a grader. Graders, bulldozers, and similar pieces of equipment produce noise levels of 85 dBA L_{max} at a distance of 50 feet.[47] While the majority of construction activities would occur closer to the center of the project site, segments of proposed trails and parking lots would be as close as 75 feet from the nearest residences and 150 feet to the Roseland Creek Elementary School and Roseland Accelerated Middle School. At this distance, a grader or bulldozer would produce noise levels of approximately 82 dBA L_{max} at 75 feet and 76 dBA L_{max} at 150 feet.[48] Additionally, grading and excavation work on the site would result in noise levels of approximately 85 dBA L_{eq} at 50 feet.

Project construction could exceed the FTA's threshold of 80 dBA L_{eq} when within 75 feet of sensitive receptors. However, this temporary impact would be reduced via implementation of Best Management Practices (BMPs). BMPs are required at the time of building permit issuance for all development to reduce impacts of construction noise level exposure to less than significant. Such BMPs include requirements for construction vehicles and equipment to be properly muffled. Additionally, constructing noise barriers would provide a five dBA reduction in noise levels where the noise barrier interrupts the line-of-sight between the noise source and receptor. Construction hours would also be limited from 7:00 am to 7:00 pm Mondays through Saturdays, and 10:00 am to 6:00 pm on Sundays and holidays.

Impact NOI-1: The project would construct a proposed park adjacent to noise sensitive, residential and educational uses which could result in temporary disturbances during construction. **(Significant Impact)**

Mitigation Measures: The following mitigation measures will be implemented by the project to ensure construction noise is reduced to 80 dBA L_{eq} at sensitive receptors:

MM NOI-1.1: The City's contractor will develop a construction noise mitigation plan to ensure noise levels would be reduced to 80 dBA L_{eq} at sensitive receptors. The construction noise mitigation plan may incorporate, but would not be limited to, the following best management practices:

[46] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, FTA Report No. 0123, September 2018.
[47] U.S.E.P.A., *Legal Compilation on Noise, Vol. 1*, p. 2-108, 1973.
[48] Construction generated noise levels drop off at a rate of about 6 dBA per doubling of the distance between the source and the receptor.

- Maximize the physical separation between noise generators and noise receptors. Such separation includes, but is not limited to, the following measures:
  - Locate stationary equipment to minimize noise impacts on the community;
  - Minimize backing movements of equipment;
- Construct temporary noise barriers, where feasible, to screen noise-generating equipment. Temporary noise barrier fences would provide a five dBA noise reduction where the noise barrier interrupts the line-of-sight between the noise source and receptor when constructed in a manner that eliminates any cracks or gaps.
- Use quiet construction equipment whenever possible and properly maintained and muffled internal combustion engine-driven construction equipment;
- Impact equipment (e.g., jack hammers and pavement breakers) shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically-powered tools.
- Compressed air exhaust silencers shall be used on other equipment.
- Prohibit unnecessary idling of internal combustion engines.
- Limit construction hours from 7:00 am to 7:00 pm Mondays through Saturdays, and 10:00 am to 6:00 pm on Sundays and holidays.
- The Director of Recreation and Parks shall designate a "disturbance coordinator" for construction activities. The coordinator would be responsible for responding to any local complaints regarding construction noise and vibration. The coordinator would determine the cause of the noise or vibration complaint and would implement reasonable measures to correct the problem.
- The construction contractor shall send advance notice in conjunction with the City of Santa Rosa Recreation and Parks Department to neighborhood residents within 300 feet of the project site as well as the Roseland Elementary School and Roseland Accelerated Middle School administrators regarding the construction schedule and including the telephone number for the disturbance coordinator at the construction site.

Implementation of MM NOI-1.1 would reduce construction noise impacts on nearby sensitive receptors by ensuring construction noise generated from the project site would be reduced to 80 dBA L_{eq} at nearby sensitive receptors. Thus, the project would not result in a substantial temporary noise impact during construction. **(Less Than Significant Impact With Mitigation Incorporated)**

Project Operation

Noise levels in the project area would increase minimally as a result of project traffic. A noise increase is considered substantial if it increases the ambient noise level by three dB or more in noise sensitive areas. A three dB increase is equivalent to a doubling of traffic on local roadways. Primary

vehicular access to the project site is provided from Burbank Avenue. The project is estimated to result in 229 daily vehicle trips which would not double roadway volumes on Burbank Avenue.[49]

The proposed park would operate from sunrise (6:00 a.m.) to sunset (6:00 p.m. PST or 9:00 p.m. PDT), seven days per week consistent with City policies. Active park uses are only proposed on the southernmost parcel, south of Roseland Creek, with passive uses in the three northerly parcels north of Roseland Creek. The operation of the community park, which is limited to daylight hours, is not anticipated to generate noise that would expose adjacent sensitive receptors to excessive noise levels. **(Less Than Significant Impact)**

Impact NOI-2:	The project would not result in generation of excessive groundborne vibration or groundborne noise levels. **(Less than Significant Impact)**

Construction of the proposed park will not require pile driving or other significant vibration causing construction activity. The proposed park would not generate excessive or perceptible vibration. Implementation of the proposed park would result in the demolition of the remaining improvements associated with the former residences on the site, which could cause temporary groundborne vibration and noise, but it is not anticipated to be lengthy in duration and would occur during the day to minimize disturbance to adjacent sensitive receptors. **(Less Than Significant Impact)**

Impact NOI-3:	The project would not be 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. The project would not expose people residing or working in the project area to excessive noise levels. **(Less than Significant Impact)**

Charles M. Schultz Sonoma County Airport is a regional municipal airport located approximately nine miles northwest of the project site. The project site is not located within the Airport Influence Area (AIA) for the Sonoma County Airport. Therefore, any overhead aircraft noise would not be significant in relation to the existing, local traffic noise. **(Less Than Significant Impact)**

3.13.2.2 *Cumulative Impacts*

Impact NOI-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant noise impact. **(Less than Significant Cumulative Impact)**

Construction

While cumulative projects could be constructed at the same time as the proposed project and result in a temporary construction noise increase, all projects in the City of Santa Rosa limits would be required to comply with their construction work hours, as well as similar measures as those identified under Impact NOI-1 (should a noise impact occur). Nevertheless, if the proposed project's

[49] W-Trans. Traffic Impact Study for the Roseland Area/Sebastopol Road Specific Plan & Annexation. April 19, 2016.

construction schedule were to overlap one or more of the cumulative projects' construction schedules for a consecutive 12 months or more and if the same sensitive receptors were impacted, the project would have a cumulatively considerable contribution to a cumulative construction noise impact.

The nearest cumulative project is located at 1690 Burbank Avenue, approximately 190 feet south of the project site. The Burbank Avenue Subdivision is currently under construction and major noise-generating construction activities (i.e. grading, paving) are anticipated to be complete prior to construction on the project site. The project, in combination with the cumulative projects, therefore, is not anticipated to have overlapping construction schedules affecting the same sensitive receptors. The cumulative projects, therefore, would not result in a significant cumulative construction noise and vibration impact. **(Less than Significant Cumulative Impact)**

Operation

As discussed under Impact NOI-1, operation of the proposed community park would have a minimal noise impact during operation. Noise generated by operation of the proposed community park would not be loud enough to combine with noise generated by the cumulative project 190 feet south of the s project site. The Roseland Area/Sebastopol Road Specific Plan EIR addressed all of the development identified in the cumulative project list (Table 3.0-1) and determined traffic noise levels on Burbank Avenue would not exceed a one dB increase. Noise level increases below three dB are generally not audible to sensitive receptors. Thus, the proposed project, in combination with cumulative projects, would not result in a significant cumulative operational noise impact. **(Less than Significant Cumulative Impact)**

3.13.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Ca[l.] 4th 369 *(BIA v. BAAQMD)*, effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of Santa Rosa has policies that address existing noise conditions affecting a proposed project.

The Noise Element of the General Plan establishes 70 dBA CNEL as the maximum suggested exterior noise level for playgrounds and neighborhood parks. Based on the General Plan noise contours, noise levels on the project site are expected to be at the 60 dBA CNEL due to traffic levels along Burbank Avenue and McMinn Avenue. Based on the General Plan noise contours for Burbank Avenue and McMinn Avenue, the proposed park would not expose persons to noise levels in excess of the General Plan standards.

3.14 POPULATION AND HOUSING

3.14.1 Environmental Setting

3.14.1.1 *Regulatory Framework*

State

Housing-Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.[50] The City of Santa Rosa Housing Element and related land use policies were last updated in 2016.

Regional and Local

Plan Bay Area 2050

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified Priority Development Areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.[51]

ABAG allocates regional housing needs to each city and county within the San Francisco Bay Area, based on statewide goals. These allocations are designed to lay the foundation for Plan Bay Area 2050's long-term envisioned growth pattern for the region. ABAG also develops a series of forecasts and models to project the growth of population, housing units, and jobs in the Bay Area. ABAG, MTC, and local jurisdiction planning staff created the Forecasting and Modeling Report, which is a technical overview of the of the growth forecasts and land use models upon which Plan Bay Area 2050 is based.

3.14.1.2 *Existing Conditions*

According to US Census Bureau data, Santa Rosa's population for 2020 was estimated to be 178,127 persons. From 2016 to 2020, there were 66,580 households with an average of 2.63 persons per

[50] California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed May 17, 2022. http://hcd.ca.gov/community-development/housing-element/index.shtml.

[51] Association of Bay Area Governments and Metropolitan Transportation Commission. *Plan Bay Area 2050*. October 21, 2021. Page 20.

household.[52] According to the City's General Plan, the projected population in 2035 will be 237,000 residents.

3.14.2 Impact Discussion

For the purpose of determining the significance of the project's impact on population and housing, would the project:

1) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
2) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

3.14.2.1 *Project Impacts*

Impact POP-1:	The project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). **(No Impact)**

The proposed project does not include any new homes, businesses, roads, or other infrastructure that would induce population growth. **(No Impact)**

Impact POP-2:	The project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. **(No Impact)**

While the project site was previously developed with several single-family homes, they have since been demolished. Therefore, the project would not displace any existing people or housing. **(No Impact)**

3.14.2.2 *Cumulative Impacts*

Impact POP-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant population and housing impact. **(No Cumulative Impact)**

The cumulative projects listed in Table 3.0-1 would result in population growth through construction of new residences. The associated population growth is consistent with the Roseland Area/Sebastopol Road Specific Plan and, therefore, would not result in unplanned growth. The cumulative projects would not result in substantial displacement of existing residents and would increase the housing

[52] US Census Bureau Quick Facts website. U.S. Census Bureau QuickFacts: Santa Rosa city, California; California Accessed May 17, 2022.

supply in the Roseland area. Additionally, the proposed community park would not have an impact on population and growth and thus, would not result in a considerable contribution to a cumulative population and housing impact. **(No Cumulative Impact)**

3.15 PUBLIC SERVICES

3.15.1 Environmental Setting

3.15.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

Government Code Section 65995 through 65998

California Government Code Section 65996 specifies that an acceptable method of offsetting a project's effect on the adequacy of school facilities is the payment of a school impact fee prior to the issuance of a building permit. Government Code Sections 65995 through 65998 set forth provisions for the payment of school impact fees by new development by "mitigating impacts on school facilities that occur (as a result of the planning, use, or development of real property" (Section 65996[a]). The legislation states that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

Developers are required to pay a school impact fee to the school district to offset the increased demands on school facilities caused by the proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

3.15.1.2 *Existing Conditions*

Fire Protection Services

The Santa Rosa Fire Department provides fire protection, paramedic emergency medical, rescue, and hazardous materials response services to the Roseland area. These services have been provided by the Santa Rosa Fire Department since 1983. The closest fire station to the project site is Station No. 8, located at 830 Burbank Avenue, approximately 0.25 miles north of the project site.

The City Council has set a goal for the Fire Department of responding to 80 percent of all calls for service within four minutes or less, to 90 percent of all calls for service within five minutes or less, and to all calls for service within six minutes or less.

Police Protection Services

The Santa Rosa Police Department provides neighborhood-oriented policing services via patrol operations and traffic enforcement. Neighborhood-oriented policing is based on encouraging citizen input and involvement to resolve issues concerning public safety, law enforcement, and criminal activity throughout the community.

Police protection services for the project site are headquartered at 965 Sonoma Avenue, approximately 3.1 miles northeast of the project site.

Parks

The Santa Rosa Recreation and Parks Department currently operates and maintains 78 parks totaling approximately 737 acres. The City maintains a park standard of three acres of City parkland per 1,000 residents. The City Council determines what ratio of neighborhood and community parkland, school playgrounds, and open space will satisfy this standard. Currently this ratio is 4.2 acres of parkland per 1,000 residents, plus 1.1 acres of public-serving open space.

3.15.2 Impact Discussion

For the purpose of determining the significance of the project's impact on 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 any of the public services:

1) Fire protection?
2) Police protection?
3) Schools?
4) Parks?
5) Other public facilities?

3.15.2.1 *Project Impacts*

Impact PS-1, 2, 3, 4, 5	The project would not 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 public services. **(Less than Significant Impact)**

The proposed project would construct a community park in an existing residential area. The project would be open from sunrise (6:00 a.m.) to sunset (6:00 p.m. PST or 9:00 p.m. PDT) seven days a week, consistent with park operational hours at all City of Santa Rosa parks. The project would not substantially increase demand for police and fire services, and would not increase existing response times to the project site. The proposed project would not result in increased demand for schools, parks, or any other public facilities in the project area. **(Less Than Significant Impact)**

3.15.2.2 *Cumulative Impacts*

Impact PS-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant public services impact. **(Less than Significant Cumulative Impact)**

Residential projects in the Roseland area would increase demand for fire service, police service, schools, parks, and other public facilities (such as libraries or community centers). The Roseland Area/Sebastopol Road Specific Plan EIR addressed all of the development identified in the cumulative project list (Table 3.0-1) and determined that with the implementation of General Plan policies, cumulative impacts to public services would not result in the need for additional facilities. Cumulative projects would be required to pay public service fees such as fair share costs towards fire and police protection services to offset impacts on public services. The proposed community park would increase public facilities in the Roseland area and would not contribute to a cumulative impact on such facilities. **(Less than Significant Cumulative Impact)**

3.16 RECREATION

3.16.1 Environmental Setting

3.16.1.1 *Regulatory Framework*

State

Government Code Section 66477

The Quimby Act (included within Government Code Section 66477) requires local governments to set aside parkland and open space for recreational purposes. It provides provisions for the dedication of parkland and/or payment of fees in lieu of parkland dedication to help mitigate the impacts from new residential developments. The Quimby Act authorizes local governments to establish ordinances requiring developers of new residential subdivisions to dedicate parks, pay a fee in lieu of parkland dedication, or perform a combination of the two.

3.16.1.2 *Existing Conditions*

The Santa Rosa Recreation and Parks Department currently operates and maintains 78 parks totaling approximately 737 acres. The City maintains a park standard of three acres of City parkland per 1,000 residents. The City Council determines what ratio of neighborhood and community parkland, school playgrounds, and open space will satisfy this standard. Currently this ratio is 4.2 acres of parkland per 1,000 residents, plus 1.1 acres of public-serving open space.

3.16.2 Impact Discussion

For the purpose of determining the significance of the project's impact on recreation:

1) 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?
2) 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?

3.16.2.1 *Project Impacts*

Impact REC-1, 2	The project would not 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. **(No Impact)**

The proposed project is the construction of a 19.49-acre community park. The project would increase the number of parks and recreational facilities in Santa Rosa and, therefore, would not result in adverse impacts to any recreational facilities. **(No Impact)**

3.16.2.2 *Cumulative Impacts*

Impact REC-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant recreation impact. **(No Cumulative Impact)**

The Roseland Area/Sebastopol Road Specific Plan EIR addressed all of the development identified in the cumulative project list (Table 3.0-1) and determined that the Specific Plan, including the proposed project, would provide sufficient land zoned for parks. The cumulative projects, therefore, would not result in a cumulative impact on recreational facilities. The proposed community park would offset the demand for recreation facilities in the Roseland area and would not result in a cumulatively considerable contribution to a cumulative significant recreational impact. **(No Cumulative Impact)**

3.17 TRANSPORTATION

3.17.1 Environmental Setting

3.17.1.1 *Regulatory Framework*

State

Regional Transportation Plan

MTC is the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area, including Sonoma County. MTC is charged with regularly updating the Regional Transportation Plan, a comprehensive blueprint for the development of mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities in the region. MTC and ABAG adopted Plan Bay Area 2050 in October 2021, which includes a Regional Transportation Plan to guide regional transportation investment for revenues from federal, state, regional and local sources through 2050.

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.50 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

Local

City of Santa Rosa VMT Guidelines

As of July 1, 2020, the City of Santa Rosa has required that new land use and transportation projects are required to comply with the City's Final Draft VMT Guidelines, dated June 2020. The City's VMT Guidelines provide CEQA transportation analysis exemption screening criteria for some development projects. The criteria are based on the type of project, characteristics, and/or location. If a project meets the City's screening criteria, the project is expected to result in less than significant VMT impacts. The following screening criteria would be applicable to the proposed community park project:

- Local-serving public facilities

Projects that do not meet the screening criteria are required to conduct a VMT analysis and provide mitigation measures for significant impacts.

Santa Rosa General Plan 2035

The following General Plan goal and policies pertaining to transportation are applicable to the project:

Goal/Policy	Description
Goal T-A	Provide a safe and sustainable transportation system.
Policy T-C-1	Minimize through traffic in residential neighborhoods and avoid excessive traffic volumes greater than that dictated by street design and classification, by providing attractive regional/arterial streets to accommodate cross-town traffic.
Policy T-D-1	Maintain a Level of Service (LOS) D or better along all major corridors.

Roseland Area/Sebastopol Road Specific Plan

The Roseland Area/Sebastopol Road Specific Plan includes a planned street design for Burbank Avenue. The northern section street design commences at the northernmost parcel on the project site and includes one travel lane in each direction with six-foot bike lanes, up to three feet of landscape buffer and a six-foot sidewalk. The southern section street design commences at 1360 Burbank Avenue and includes one travel lane in each direction with six-foot bike lanes, 8.5-foot bioswales and a six-foot sidewalk. The proposed community park maintains a rural character along the Burbank Avenue frontage and does not propose to implement the roadway frontage improvements at this time.

3.17.1.2 *Existing Conditions*

Roadway Network

Regional Access

Sebastopol Road is a five-lane arterial roadway including two lanes in each direction plus a center turn lane between Stony Point Road and Burbank Avenue and a three-lane road with one lane in each direction plus a center turn lane between Burbank Avenue and Olive Street.

Hearn Avenue is an arterial roadway that includes two lanes plus a center turn lane between US 101 and the Sonoma-Marin Area Rail Transit (SMART) tracks. Between the SMART tracks and Stony Point Road, the street generally includes one lane in each direction plus a center turn lane.

Local Access

Burbank Avenue is a north-south local road that serves as a connector between two arterial roadways, Sebastopol Road and Hearn Avenue. This street provides the area's primary connection to the surrounding arterial street network. No street parking is provided on Burbank Avenue.

McMinn Avenue is a local roadway that is located east of the project site and connects to Sebastopol Road on the north and West Avenue via Delport Avenue to the south. Street parking is available on both sides of the street, which resides within a neighborhood.

Pedestrian and Bicycle Facilities

Schools have a major influence on pedestrian activity levels in the project area. Roseland Creek Elementary School on Burbank Avenue generates school-age pedestrian traffic on school days. No sidewalks are present on the roadway frontages of the park. Sidewalks are located on the west side of Burbank Avenue and east side of McMinn Avenue.

Bike lanes currently exist on Sebastopol Road between Stony Point Road and Dutton Avenue, on Stony Point Road between Bellevue Avenue and State Route 12, and on Hearn Avenue between Stony Point Road and the SMART rail line. A bike lane is present on the west side of Burbank Avenue along the Roseland Creek Elementary School frontage. The Roseland Area/Sebastopol Road Specific Plan includes a planned street design for Burbank Avenue that includes Class II bike lanes along the project frontage.

Transit Service

Santa Rosa CityBus

Santa Rosa CityBus is the primary transit provider in Santa Rosa and the Roseland area. CityBus provides regularly scheduled fixed-route service to residential neighborhoods, major activity centers, and transit hubs within the City limits. Fourteen fixed routes are operated with wheelchair accessible, low-floor buses which can accommodate up to two bikes on bike racks attached to the front of each bus. CityBus routes are designed around a timed-transfer method where buses serving different routes arrive and depart at designated transfer locations at routine periodic intervals.

CityBus Routes 2A/2B, 12, and 15 serve portions of the Roseland area with Routes 12 and 15 serving the Southside Bus Transfer Center which is located on Hearn Avenue at Southwest Community Park. The Southside Transfer Center includes shelters and lighting, and facilitates timed transfers among the three CityBus routes. The CityBus bus stops closest to Roseland Creek Community Park are located on West Avenue at South Avenue (Route 12), and Sebastopol Road at Burbank Avenue and McMinn Avenue (Route 2/2B).

3.17.2 Impact Discussion

For the purpose of determining the significance of the project's impact on transportation, would the project:

1) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?
2) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
3) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
4) Result in inadequate emergency access?

3.17.2.1 *Project Impacts*

Impact TRN-1:	The project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. **(Less than Significant Impact)**

Roadways

The project would not make any changes to the existing roadway network. Per SB 743, the City's LOS standards cannot be used in CEQA analysis for transportation impacts. The VMT impact from the project is discussed in Impact TRN-2, below.

Bicycle, Pedestrian, and Transit Facilities

The proposed project would not conflict with existing or planned multimodal transportation facilities or conflict with the City of Santa Rosa's General Plan policies and regulations. The park proposes to construct an additional sidewalk on McMinn Avenue to close the sidewalk gap along the northeastern property boundary. A proposed crosswalk would connect the community park to Roseland Creek Elementary School in the northerly section of the park. The proposed park master plan would not conflict with future planned improvements to Burbank Avenue. **(Less than Significant Impact)**

Impact TRN-2:	The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). **(Less than Significant Impact)**

According to the City's VMT Guidelines, local-serving public facilities, such as a park, can be assumed to have a less than significant VMT impact. The project proposes to construct a community park in an existing residential area. Therefore, no further VMT analysis is needed, and the project is assumed to have a less than significant VMT impact. **(Less than Significant Impact)**

Impact TRN-3:	The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). **(Less than Significant Impact)**

Development in accordance with City design standards will ensure that hazards due to a design feature would be avoided. **(Less Than Significant Impact)**

Impact TRN-4:	The project would not result in inadequate emergency access. **(Less than Significant Impact)**

The proposed park would provide emergency access at the two driveways that connect to the parking lots located on the southwestern and western portions of the property off of Burbank Avenue. The emergency vehicle access and turnaround areas would be constructed in conformance to the Santa Rosa Fire Department standards. **(Less Than Significant Impact)**

3.17.2.2 *Cumulative Impacts*

Impact TRN-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant transportation impact. **(Less than Significant Cumulative Impact)**

The proposed community park is considered to have a less than significant impact on VMT because it is a local-serving public facility. The Roseland Area/Sebastopol Road Specific Plan EIR addressed all of the development identified in the cumulative project list (Table 3.0-1) and determined that VMT from planned development in Roseland would be reduced with implementation of the Specific Plan. Future residents of the cumulative projects listed in Table 3.0-1 would be able to utilize the proposed community park for recreation. The presence of a new park in the vicinity of the cumulative projects would decrease the need for future residents to travel longer distances for recreation. Thus, the proposed community park would not contribute to a cumulative VMT impact, it has the potential to lower VMT in the area by providing a local-serving public facility. The Roseland Area/Sebastopol Road Specific Plan included planned improvements to the transportation and circulation system to accommodate the planned development, therefore, the cumulative projects would not result in a significant cumulative impact to the design or operation of transportation facilities in the Roseland area. Cumulative projects would be reviewed individually to ensure that they would not result in hazards or inadequate emergency access. The project vehicular access points would adhere to City design standards and provide adequate emergency vehicle access and, therefore, would not contribute to a cumulatively considerable transportation impact. **(Less than Significant Cumulative Impact)**

3.17.3 Non-CEQA Effects

While the evaluation of project CEQA impacts on the transportation system is based on VMT, the following discussion is included for informational purposes because General Plan Policy T-D-1 requires that major corridors maintain a LOS of D or better.

Project Trip Generation Estimates

Project trip estimates for the proposed project are based on trip generation rates obtained from SANDAG (San Diego Area Council of Governments) and peak hour trip rates from the *Institute of Transportation Engineers' "(ITE's) Trip Generation Manual, 10th Edition, 2017.* Based on the applied assumptions and trip generation rates, the proposed park is expected to generate an average of 230 daily trips, including 21 trips during the PM peak hour and 72 trips during the weekend midday peak hour. The trip generation estimates for the proposed project are summarized in Table 3.17-1.

Table 3.17-1: Trip Generation Summary											
Land Use	**Size**	**Daily Trips**		**Weekday PM Peak Hour**				**Weekend Midday Peak Hour**			
		Rate	**Trips**	**Rate**	**Trips**	**In**	**Out**	**Rate**	**Trips**	**In**	**Out**
City Park	4.59 acres	50	230	4.5	21	10	11	15.75	72	36	36
Source: *Institute of Transportation Engineers' (ITE's) Trip Generation Manual, 10th Edition SANDAG.*											

The primary roadway intersections on Burbank Avenue at Sebastopol Road, Hughes Avenue, and Hearn Avenue were shown to operate at LOS A in 2019. [53] The City has collected development fees to signalize Hearn Avenue and Burbank Avenue consistent with the Roseland Area/Sebastopol Road Specific Plan. Given that current traffic levels of service at major intersections in the vicinity of the project site operate consistent with City standards and would continue to operate acceptably with implementation of the Roseland Area/Sebastopol Road Specific Plan,[54] the limited number of new peak hour vehicle trips resulting from the project would not cause any intersections in the project area to operate below acceptable levels.

[53] *W-Trans*. Final Traffic Impact Study for the Burbank Avenue Subdivision Project. December 11, 2019.
[54] *W-Trans*. Traffic Impact Study for the Roseland Area/Sebastopol Road Specific Plan & Annexation. April 19, 2016.

3.18 TRIBAL CULTURAL RESOURCES

3.18.1 Environmental Setting

3.18.1.1 *Regulatory Framework*

State

Assembly Bill 52

AB 52, effective July 2015, established a new category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). AB 52 requires lead agencies to provide notice of projects to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Where a project may have a significant impact on a tribal cultural resource, consultation is required until the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or until it is concluded that mutual agreement cannot be reached.

Under AB 52, TCRs are defined as follows:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either:
    - Included or determined to be eligible for inclusion in the California Register of Historic Resources, or
    - Included in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).
- A resource determined by the lead agency to be a TCR.

3.18.1.2 *Existing Conditions*

As described in Section 3.5 Cultural Resources, at the time of European settlement, the project area was situated in an area controlled by the Southern Pomo. The Southern Pomo were hunter-gatherers who lived in rich environments that allowed for dense populations with complex social structures. They settled in large, permanent villages about which were distributed seasonal camps and task-specific sites. Sites often were situated near freshwater sources and in ecotones where plant life and animal life were diverse and abundant.

A 2011 cultural resources survey conducted for the project by *Tom Origer & Associates* found that there are no known cultural resources within the project vicinity. The cultural resources study included filing a sacred lands file request to the NAHC. The NAHC replied indicating that the sacred lands file has no information about the presence of TCRs in the project area. Letters were also sent to several local tribes including the Federated Indians of Graton Rancheria, Lytton Rancheria of California, and Suki Waters. A response from the Federated Indians of Graton Rancheria indicated that they have no first-hand knowledge of cultural resources but were told that obsidian flakes and dark soil were observed on-site by a local resident. No other responses were received.

The City sent AB 52 notification letters to the Federated Indians of Graton Rancheria and Lytton Rancheria of California in July 2022. Both tribes had previously engaged with the City of Santa Rosa on the project design. The tribes did not request consultation under AB 52 with the City on the project.

3.18.2 Impact Discussion

For the purpose of determining the significance of the project's impact on tribal cultural resources, 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:

1) 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)?
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.18.2.1 *Project Impacts*

Impact TCR-1:	The project would not cause a substantial adverse change in the significance of a tribal cultural resource 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) with implementation of mitigation. **(Less than Significant Impact with Mitigation Incorporated)**

There are no known TCRs in the project area. However, it is possible that ground-disturbing activities during project construction would disturb buried TCRs on-site. Implementation of MM CUL-3.1 (see Section 3.5 Cultural Resources) would ensure that a Native American tribal monitor is present on-site during ground-disturbing activities and would have the authority to stop and redirect grading activities to evaluate the significance of any archaeological resources discovered on-site. The NAHC would be contacted if any human remains are discovered that appear to be Native American. Therefore, with implementation of MM CUL-3.1, the project would not cause a substantial adverse change in the significance of a TCR. **(Less than Significant Impact with Mitigation Incorporated)**

Impact TCR-2:	The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is 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 with implementation of mitigation. **(Less than Significant Impact with Mitigation Incorporated)**

Please see the response to Impact TCR-1, above. **(Less than Significant Impact with Mitigation Incorporated)**

3.18.2.2 *Cumulative Impacts*

Impact TCR-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant tribal cultural resources impact. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

Most development projects in Santa Rosa would require a level of excavation and grading or other activities that may affect TCRs. Each project is to complete its own literature review, as applicable, to determine the level of archaeological and cultural sensitivity of its project site. However, all projects occurring in the City of Santa Rosa would be required to implement mitigation measures, as applicable, that would avoid impacts and/or reduce them to a less than significant level, consistent with CEQA requirements. Such measures consist of preliminary investigation prior to full excavation, avoidance measures during ground disturbance activities, and/or monitoring during ground disturbance activities. Collection and evaluation of finds are also part of these mitigation measures. These projects would also be subject to federal, state, and county laws regulating cultural resources such as protocols of handling TCRs, if found on the project site. For these reasons, the proposed project in combination with the cumulative scenario projects would not result a significant impact on TCRs. **(Less than Significant Cumulative Impact with Mitigation Incorporated)**

3.19 UTILITIES AND SERVICE SYSTEMS

3.19.1 Environmental Setting

3.19.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The City of Santa Rosa adopted its most recent 2020 UWMP in June 2021.

Assembly Bill 939

The California Integrated Waste Management Act of 1989, or AB 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of solid waste generated (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. Projects that would have an adverse effect on waste diversion goals are required to include waste diversion mitigation measures.

California Green Building Standards Code

The California Green Building Standards Code (CALGreen) establishes mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and indoor environmental quality. These standards include mandatory measures, as well as more rigorous voluntary guidelines, for new construction projects to achieve specific green building performance levels.

Santa Rosa General Plan 2035

The following General Plan policies pertaining to utilities and service systems are applicable to the project:

Policy	Description
PSF-F-1	Utilize high quality water from the Sonoma County Water Agency (Sonoma Water) aqueduct system as the primary water supply.
PSF-F-3	Develop available groundwater resources for the purpose of providing a supplemental source of water in the event of an emergency.

PSF-F-6	Evaluate the city's long-term water supply strategies, including development of new sources of water supply, improved water conservation and re-use, and implementation of appropriate growth control measures if necessary.

3.19.1.2 *Existing Conditions*

Water

The City of Santa Rosa receives its primary potable water supply from the Russian River watershed. Water is provided through the Russian River Project managed by the Sonoma County Water Agency (Sonoma Water). . From its headwaters in central Mendocino County, the Russian River drains a 1,485 square mile area.[55] Principal tributaries of the Russian River are the East Fork of the Russian River, Big Sulphur Creek, Mark West Creek, Maacama Creek, and Dry Creek. There are also two major reservoir projects located within the Russian River watershed (Lake Mendocino on the East Fork of the Russian River and Lake Sonoma on Dry Creek) that provide water supply storage. Sonoma Water controls and coordinates water supply release from Lake Mendocino and Lake Sonoma.

Separate from the Sonoma Water system, the City of Santa Rosa owns eight groundwater well sites; two are inactive and out of service. Out of the six remaining active wells, two were converted from emergency to active status in July 2005 and can provide up to 2,300 acre feet per year (afy) of supply.[56] Three of the active wells are only operated for emergency purposes, and one is used only for landscape irrigation purposes. The City has approximately one million gallons per day (mgd) of groundwater capacity on a stand-by emergency basis.[57]

Storm Drainage

Topography at the site is nearly flat with a very slight slope to the southwest. Roseland Creek, an intermittent stream that is a tributary of the Laguna de Santa Rosa runs through the site from the northeast to the southwest. The upper reach of the creek, where the creek enters the project site, is approximately eight feet wide and has a concrete slab bed for approximately 400 linear feet. The lower reach (western portion) of the stream has a more natural channel composed of rock and cobble mixed with sands and silts, and contains a backflow channel which supports a riparian wetland near Burbank Avenue at the western edge of the site.

Wastewater/Sanitary Sewer System

Sewage generated from residential, commercial and industrial uses within the City of Santa Rosa is collected and transported to the Laguna Wastewater Treatment Plant (WTP), located southwest of the city on Llano Road. The Laguna WTP, managed by the City of Santa Rosa, provides wastewater treatment and disposal services for the city as well as for Rohnert Park, Cotati, Sebastopol, and South Park Sanitation District. Wastewater is tertiary-treated and, depending upon the amount of rainfall received in any given year, between 90 and 100 percent is recycled for urban and agricultural irrigation and for the Geysers Recharge Project. Currently, 6,000 acres of crops are irrigated with recycled water to grow hay, pasture, vegetables, wine grapes, and for landscaped areas.

[55] Sonoma Water. "Water Supply – Russian River System". Accessed December 8, 2022. https://www.sonomawater.org/water-supply
[56] City of Santa Rosa. *2020 Urban Water Management Plan*. June 2021.
[57] Ibid.

The laguna WTP is currently permitted to treat up to 21.34 million gallons per day. Projects under Santa Rosa's Subregional Water Reuse System Incremental Recycled Water Program (IRWP), which was originally undertaken in 2001, will be implemented as growth occurs, eventually increasing the plant's capacity to 25.79 mgd, 18.25 mgd of which would be allocated to Santa Rosa.

Solid Waste

The City of Santa Rosa contracts with the Recology Sonoma-Marin to provide solid waste collection and curbside recycling for residential and commercial uses in Santa Rosa. Recology Sonoma-Marin is the licensed hauler and recycler for the project area. Recology Sonoma-Marin collects and transports commercial and residential solid waste to the Central Disposal Site Transfer Station at 500 Meacham Road in the City of Petaluma. The Central Disposal Site has a daily permitted disposal of about 2,500 tons per day, and an estimated closure year of 2043.[58]

3.19.2 Impact Discussion

For the purpose of determining the significance of the project's impact on utilities and service systems, would the project:

1) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
2) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
3) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
4) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
5) Be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?

3.19.2.1 *Project Impacts*

Impact UTL-1:	The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. **(Less than Significant Impact)**

The proposed project includes the construction of a nature center and restroom north of Roseland Creek and a restroom adjacent to the sports court and lawn area. The minor increase in restroom

[58] CalRecycle. Central Disposal Site – Sonoma County, Revised Solid Waste Facility Permit. February 7, 2020.

facility usage at the proposed park will not require or result in the construction of new water, wastewater treatment, electric power, natural gas, or telecommunication facilities or expansion of existing facilities, and has been analyzed by the City of Santa Rosa 2035 General Plan.

Implementation of the proposed project would result in a slight increase in stormwater runoff due to an increase in impermeable surfaces compared to existing conditions. The proposed project will add or replace more than 10,000 square feet of impervious surfaces, thus it must conform to the site design and treatment requirements of the Phase I MS4 Permit. Plans will be certified by engineers to ensure incorporation of appropriate and effective site design, source control, and Low Impact Development (LID) treatment controls to reduce post-construction runoff volumes and remove pollutants from runoff entering the storm drainage system. The project will be required to maintain all post-construction treatment control measures throughout the life of the project. Therefore, the project would limit the runoff from the site and no new or expanded stormwater facilities would be required. **(Less than Significant Impact)**

Impact UTL-2:	The project would not have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. **(Less than Significant Impact)**

The project would require minimal water for landscaping and turf maintenance. Based on the 2014 Water System Master Plan Update, park uses require 0.3 acre-feet of water per acre annually (afy). Approximately 4.59 acres of the site are estimated to require water use for recreational activities and would result in water use of 1.38 afy or 1,231 gallons per day. The project site is identified as a *Community Park* in the City of Santa Rosa 2035 General Plan and, therefore, is part of the growth analyzed in the 2020 UWMP. Based on the 2020 UWMP, the City would have over 6,000 afy excess supply through 2045 during normal years. The City is anticipated to have 1,000 afy excess supply through 2025 during single dry years and no excess supply beyond 2025 in single dry years. The City is anticipated to have 1,000 afy excess supply through 2045 in multiple dry year scenarios. In drought conditions, the City would enact its Water Shortage Contingency Plan to reduce demands as needed to ensure available supplies would be adequate to meet demands. The project, in addition to the rest of the City, would participate in water conservation measures as required by the Water Shortage Contingency Plan. Based on the water supply availability in normal years and multiple dry years and required compliance with the Water Shortage Contingency Plan in single dry years, the water use of the project would have a less than significant impact on the sufficiency of water supplies. **(Less Than Significant Impact)**

Impact UTL-3:	The project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. **(Less than Significant Impact)**

The project would construct restroom facilities which would incrementally increase wastewater demand. According to the Sanitary Sewer Master Plan Update,[59] no improvements to the sanitary

[59] City of Santa Rosa. *Sanitary Sewer Master Plan Update*. October 2014.

sewer system in the project area are required. The limited increase in flows to the sanitary sewer system from the project site would not impact the existing sanitary sewer system. **(Less Than Significant Impact)**

Impact UTL-4:	The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. **(Less than Significant Impact)**

The project would generate approximately 1.8 tons of solid waste per year from park patrons.[60] This would be an incremental increase in demand upon the Central Disposal Site, given that the site has a daily permitted disposal of about 2,500 tons per day. There would be adequate capacity to accommodate solid waste generated by the project. The project would comply with federal, state, and local statutes and regulations related to solid waste. **(Less Than Significant Impact)**

Impact UTL-5:	The project would not be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste. **(Less than Significant Impact)**

See Impact UTL-4. **(Less than Significant Impact)**

3.19.2.2 *Cumulative Impacts*

Impact UTL-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant utilities and service systems impact. **(Less than Significant Cumulative Impact)**

The Roseland Area/Sebastopol Road Specific Plan EIR addressed all of the development identified in the cumulative project list (Table 3.0-1) and determined that expanded water supply and treatment infrastructure would not be required. The 2020 UWMP determined that implementation of the Water Shortage Contingency Plan would be required to reduce water demand to address shortfalls in single dry years. The cumulative projects were considered in the 2020 UWMP as part of planned growth within the city and would not result in cumulatively significant impacts to water supply. The Roseland Area/Sebastopol Road Specific Plan EIR found that development of the Roseland area would not exceed the capacity of the wastewater treatment plant or require additional sewer system improvements than those previously identified in the 2014 Sanitary Sewer Master Plan Update. The Roseland Area/Sebastopol Road Specific Plan EIR also found that development of the Roseland area would not result in a net increase in stormwater volumes nor require major improvements to the City's drainage system with the implementation of General Plan policies and LID requirements. The Roseland Area/Sebastopol Road Specific Plan EIR found that impacts to solid waste facilities would be less than significant with the implementation of General Plan policies and recycling programs.

[60] California Emissions Estimator Model. *Appendix D Default Tables*. Table 10.1 Solid Waste Disposal Rates. October 2017.
19.49 acres x 0.09 tons of solid waste per year (Land Use: "City Park") = 1.75 tons per year

Relocation or construction of new or expanded utility facilities by the cumulative projects would be subject to similar construction-related mitigation measures as the proposed community park. The existing utility and service systems that serve the project area would not exceed their planned capacity in order to serve the proposed community park and cumulative projects. The proposed community park would result in a minimal increase in utility usage and, therefore, the project would not result in a considerable contribution to a cumulatively significant impact on utilities and service systems. **(Less than Significant Cumulative Impact)**

3.20 WILDFIRE

3.20.1 Environmental Setting

3.20.1.1 *Existing Conditions*

The California Department of Forestry and Fire Protection (Cal Fire) is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. Referred to as Fire Hazard Severity Zones (FHSZ), these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. The project site is not located in a FHSZ[61] or the City's Wildland Urban Interface (WUI) Fire Area.[62] The project site is surrounded by urban development to the north, east, and west. The area immediately to the south of the project site is a single-family residential parcel with an adjacent single-family subdivision currently under construction to the south. Thus, the project site is not adjacent to any wildlands.

The project site consists of four parcels, which are primarily undeveloped, but previously contained single-family residences on three of the parcels. Portions of the site were formerly used as orchards. The residences have been demolished and only remnant structures, such as building foundations, remain on-site. As previously discussed in Section 3.7 Geology and Soils, the project site is relatively flat, with a general slope of less than two percent. According to the General Plan Geologic and Seismic Hazards Map, the site is not located in or near any Landslide Complexes or Areas of Relatively Unstable Rock on Slopes of Greater than 15%. Therefore, the project site is not susceptible to landslides.

As previously discussed in Section 3.10 Hydrology and Water Quality, portions of the project site are located within the 100-year flood plain (Zone AE – Special Flood Hazard Areas Subject to Inundation by the 1% Annual Chance Flood).[63] The areas of the project site that are affected include the eastern half of the northerly two parcels, primarily north of Roseland Creek and the westerly end of 1400 Burbank Avenue on the north and south sides of Roseland Creek.

3.20.2 Impact Discussion

For the purpose of determining the significance of the project's impact on wildfire, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

1) Substantially impair an adopted emergency response plan or emergency evacuation plan?
2) 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?

[61] California Board of Forestry and Fire Protection. *Fire Hazard Severity Zones Maps*. Accessed September 13, 2022. https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/
[62] City of Santa Rosa. "Wildland-Urban Interface Fire Area." Accessed July 20, 2023. https://santarosa.maps.arcgis.com/apps/instant/lookup/index.html?appid=81c7142965484e5bacc3d963424ed03d.
[63] Federal Emergency Management Agency. Flood Insurance Rate Map. Map Number 06097C0736F. October 16, 2012. Accessed May 12, 2022. https://msc.fema.gov/portal/home

3) 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?
4) 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?

3.20.2.1 *Project Impacts*

Impact WF-1:	The project would not substantially impair an adopted emergency response plan or emergency evacuation plan. **(No Impact)**

The project would not interfere with an adopted emergency response plan or emergency evacuation plan. The park would provide access for emergency vehicles via Burbank Avenue and would not alter the existing roadways so as to restrict emergency vehicle or evacuation access. **(No Impact)**

Impact WF-2:	The project would not, 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. **(No Impact)**

The proposed community park would not introduce any new occupants to the project site. The project would not affect slopes or winds and would not otherwise exacerbate wildfire risks at the project site. **(No Impact)**

Impact WF-3:	The project would not 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. **(No Impact)**

The proposed nature center and restroom buildings would connect to existing utility lines on Burbank Avenue and would not require any major new infrastructure. The project, therefore, would not exacerbate fire risk on-site. **(No Impact)**

Impact WF-4:	The project would not 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. **(No Impact)**

As previously discussed in Section 3.7 Geology and Soils, the project site is relatively flat, with a general slope of less than two percent. According to the General Plan Geologic and Seismic Hazards Map, the site is not located in or near any Landslide Complexes or Areas of Relatively Unstable Rock on Slopes of Greater than 15%. Therefore, the project site is not susceptible to landslides.

As previously discussed in Section 3.10 Hydrology and Water Quality, portions of the project site are located within the 100-year flood plain (Zone AE – Special Flood Hazard Areas Subject to Inundation by the 1% Annual Chance Flood).[64] The areas of the project site that are affected include the eastern half of the northerly two parcels, primarily north of Roseland Creek and the westerly end of 1400 Burbank Avenue on the north and south sides of Roseland Creek. The majority of the mapped 100-year flood hazard zone on the project site covers existing riparian, oak woodland and grassland habitat areas upon which no structures or group facilities are proposed. The project would not result in any substantial changes in runoff or drainage from the site. The topography of the project site is relatively flat and the location is far from any major lake or reservoir. Therefore, the project is not likely to experience significant risks associated with downstream flooding.

The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, the project area is unlikely to experience environmental changes due to wildfire that would significantly increase risks to people or structures at the project site. **(No Impact)**

Impact WF-C:	The project would not result in a cumulatively considerable contribution to a cumulatively significant wildfire impact. **(No Cumulative Impact)**

The cumulative projects are located on sites with similar topography, drainage, flooding, and fire hazards as the proposed project and, therefore, would not exacerbate risks of wildfires. For the reasons described above, the project would not exacerbate risks of wildfire on-site that would contribute to a cumulative impact. **(No Cumulative Impact)**

[64] Federal Emergency Management Agency. Flood Insurance Rate Map. Map Number 06097C0736F. October 16, 2012. Accessed May 12, 2022. https://msc.fema.gov/portal/home

SECTION 4.0 GROWTH-INDUCING IMPACTS

Impact GRO-1:	The project would not foster or stimulate significant economic or population growth in the surrounding environment. **(Less than Significant Impact)**

The project proposes to develop a community park within a residential neighborhood. The project would not generate any new residents or jobs within the City. Therefore, the project would not foster or stimulate significant economic or population growth in the surrounding environment. **(Less than Significant Impact)**

SECTION 5.0 SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

This section was prepared pursuant to CEQA Guidelines Section 15126.2(d), which requires a discussion of the significant irreversible changes that would result from the implementation of a proposed project. Significant irreversible changes include the irretrievable use of nonrenewable resources, the commitment of future generations to similar use, and irreversible damage resulting from environmental accidents associated with the project.

5.1.1 Irretrievable Use of Nonrenewable Resources

During construction and operation of the project, nonrenewable resources would be consumed. Unlike renewable resources, nonrenewable resources cannot be regenerated over time. Nonrenewable resources include fossil fuels and metals. Renewable resources, such as lumber and other wood byproducts, could also be used.

Energy, as discussed in more detail in Section 3.6 Energy, would be consumed during both the construction and operational phases of the project. The construction phase would require the use of nonrenewable construction material, such as concrete, metals, plastics, and glass. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation of building materials, site preparation, and construction of the buildings. The operational phase would consume energy for multiple purposes including building heating and cooling, lighting, appliances, and electronics. Energy, in the form of fossil fuels, would be used to fuel vehicles traveling to and from the site.

Given the nature of the proposed community park, the project would not result in a substantial increase in demand for nonrenewable resources. Additionally, all projects in the City of Santa Rosa are required to meet CalGreen and Title 24 energy efficiency requirements, thus lessening overall energy demand.

5.1.2 Commitment of Future Generations to Similar Use

The project would be developed on a site that is adjacent to urban uses such as residential neighborhoods and an elementary school. Development of the proposed project would commit a substantial amount of resources to prepare the site, construct the buildings and park amenities, and operate them, but it would not result in development in an area where urban development does not already exist.

5.1.3 Irreversible Damage Resulting from Environmental Accidents

The project proposes a community park that is not a uniquely hazardous use nor likely to cause environmental accidents that impact adjacent areas. As discussed in Section 3.9 Hazards and Hazardous Materials, there are no significant unmitigable hazards and hazardous materials conditions on-site or off-site that would substantially affect the public and surrounding environment. Additionally, there are no significant unmitigable geology and soils impacts which would result from implementation of the project. For these reasons, the project would not result in irreversible damage that may result from environmental accidents.

SECTION 6.0 SIGNIFICANT AND UNAVOIDABLE IMPACTS

A significant unavoidable impact is an impact that cannot be mitigated to a less than significant level if the project is implemented as it is proposed. The proposed project would not result any significant and unavoidable impacts.

SECTION 7.0 ALTERNATIVES

The California Environmental Quality Act (CEQA) requires that an EIR identify and evaluate alternatives to a project as it is proposed. Two key provisions from the CEQA Guidelines pertaining to the discussion of alternatives are included below:

> **Section 15126.6(a). Consideration and Discussion of Alternatives to the Proposed Project.** An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.
>
> **Section 15126.6(b). Purpose.** Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede, to some degree, the attainment of the project objectives, or be more costly.

Other elements of the CEQA Guidelines discuss that alternatives should include enough information to allow a meaningful evaluation and comparison with the proposed project. The CEQA Guidelines state that if an alternative would cause one or more additional impacts, compared to the proposed project, the discussion should identify the additional impact, but in less detail than the significant effects of the proposed project.

The three critical factors to consider in selecting and evaluating alternatives are: (1) the significant impacts from the proposed project that could be reduced or avoided by an alternative, (2) consistency with the project's objectives, and (3) the feasibility of the alternatives available. Each of these factors is discussed below.

7.1 SIGNIFICANT IMPACTS FROM THE PROJECT

7.1.1 Significant Unavoidable Impacts

As mentioned above, the CEQA Guidelines advise that the alternatives analysis in an EIR should be limited to potentially feasible alternatives that would avoid or substantially lessen any of the significant effects of the project and would achieve most of the project objectives. The project would not result in any significant, unavoidable impacts.

7.1.2 Less than Significant Impacts with Mitigation Incorporated

Alternatives may also be considered if they would further reduce impacts that are already less than significant because of required or proposed mitigation. Impacts that would be significant, but for which the mitigation is available to reduce them to less than significant levels include:

- Biological Resources (bats, northwestern pond turtle, nesting birds, California tiger salamander)
- Cultural Resources (archaeological resource/human remains)
- Hazards and Hazardous Materials (refuse dump)
- Noise (Construction noise)
- Tribal Cultural Resources (unknown buried tribal cultural resources)

Table 7.4-2 summarizes the project (and project alternatives) impacts that were determined to be less than significant impacts with mitigation incorporated.

7.2 PROJECT OBJECTIVES

Pursuant to CEQA Guidelines Section 15124, the EIR must include a statement of the objectives sought by the proposed project. While CEQA does not require that alternatives be capable of meeting all of the project objectives, their ability to meet most of the objectives is considered relevant to their consideration. Based on substantial community input received in over 30 meetings for the project, the City's objectives for the proposed park include the following:

Core Project Objectives

The City's core objectives for Roseland Creek Community Park include the following:

- Increase park acreage in the southwest area of the City to meet General Plan standards of 3.5 acres of City parks per 1,000 residents, and
- Provide a publicly accessible Community Park in the Roseland area to serve residents generally within a one-mile radius with equal opportunities for passive and active recreation, and
- Develop park uses consistent with conservation easements held for the property by SCAPOSD, and
- Provide amenities for the site consistent with input provided by tribal nations registered with the City of Santa Rosa such as providing drinking fountains, restrooms, group picnic areas, barbecues, parking near play equipment and picnic areas, parking for elders, interpretation of tree species, and
- Provide non-permeable bicycle and pedestrian public access across and throughout the site for community members of all abilities, including ADA-compliant features to provide equal access for all, and
- Provide large industry standard and natural youth play equipment with areas for children ages 2-5 and 5-12, and
- Provide for emergency vehicle access to all areas of the park to ensure public safety.

Full Project Objectives

The City's full objectives for Roseland Creek Community Park include the following:

- Provide spaces for picnic events, site specific unique features, natural areas, community gardens and a recreational facility for community use, and
- Provide fitness equipment and sport court areas for promoting a healthy lifestyle, and
- Provide one large, irrigated lawn area or artificial turf to allow for casual picnicking, casual ball and frisbee type play, yoga, casual children's activities and similar recreation on a stable lawn or artificial turf surface, and
- Provide active uses such as community garden and outdoor classroom gathering area, and
- Provide a park that minimizes the number of trees that need to be removed to improve the park site and provide recreation, and
- Provide interpretive and educational signs throughout the park in at least three different languages, and
- Provide fencing that will function as a natural barrier between vehicles and pedestrians traveling adjacent to Burbank Avenue and to help guide students to the future street crossing.

7.3 FEASIBILITY OF ALTERNATIVES

CEQA, the CEQA Guidelines, and the case law on the subject have found that feasibility can be based on a wide range of factors and influences. The CEQA Guidelines advise that such factors can include (but are not necessarily limited to) the suitability of an alternate site, economic viability, availability of infrastructure, consistency with a general plan or with other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent can "reasonably acquire, control or otherwise have access to the alternative site (Section 15126.6[f][1])."

7.4 ALTERNATIVES ANALYSIS

7.4.1 Alternatives Considered But Rejected

7.4.1.1 *Location Alternative*

Location alternatives are frequently considered to reduce the site-specific impacts of a project. The alternative location would typically need to be of similar size to the proposed site and have the appropriate General Plan land use designation(s). Given that the proposed community park has been identified in the City's General Plan, conservation easements are held for many of the properties by SCAPOSD, and the City's desire to develop a centrally located community park to serve Roseland residents, alternative locations were not further considered. One of the primary environmental concerns for the proposed park is its general location within critical habitat for CTS which would be a constraint on any park development within the Roseland area of Santa Rosa. Moreover, the City has spent decades acquiring the necessary park acreage to develop a community park within the Roseland area and it is unlikely a comparable number of properties would be available for park uses in the timeframe of the General Plan. For these reasons, an alternative location to the proposed project site was considered but rejected as infeasible.

7.4.2 Analyzed Alternatives

In addition to a "No Project" Alternative, the CEQA Guidelines advise that the range of alternatives discussed in the EIR should be limited to those that "would avoid or substantially lessen any of the significant effects of the project" (Section 15126.6[f]). The discussion below addresses alternatives which could reduce project impacts and are feasible from a physical land use, infrastructure, site suitability, and general plan consistency perspective, and whether the City can reasonably acquire, control, or otherwise have alternative access to the site. This Draft EIR does not evaluate the financial or economic feasibility of the alternatives. The components of these alternatives are described below, followed by a discussion of their impacts and how they would differ from those of the proposed project.

7.4.2.1 *No Project – No Development Alternative*

The CEQA Guidelines specifically require consideration of a "No Project" Alternative. The purpose of including a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The Guidelines specifically advise that the No Project Alternative is "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." The Guidelines emphasize that an EIR should take a practical approach, and not "…create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment (Section 15126.6[e][3][B])."

The No Project Alternative assumes that the project site would remain as it is today with only remnant improvements such as foundations, building pads, driveways, refuse, fences, and underground utilities from the former residential uses on the site.

Comparison of Environmental Impacts

The No Project Alternative would avoid all the project's environmental impacts.

Aesthetics

Under the No Project Alternative, the project site would remain as open space and no visual changes would be made.

Air Quality

Under the No Project Alternative, the project site would remain vacant, and there would be no change in air emissions. Therefore, there would be no impacts related to air quality due to construction or increased operational emissions.

Biological Resources

Under the No Project Alternative, the project site would remain as open space. The existing habitat would remain unchanged and no trees would be removed. The No Project Alternative would have no impact on biological resources.

Cultural Resources

Under the No Project Alternative, there would be no subsurface ground disturbance that could impact undiscovered cultural resources. Accordingly, impacts to historical resources as defined in §15064.5 would not occur. The No Project Alternative would not have an impact on cultural resources.

Energy

Under the No Project Alternative, the project site would remain vacant and there would be no construction. There would be no impact on energy resources.

Geology and Soils

Under the No Project Alternatives, the project site would remain vacant and no structures would be developed on-site. There would be no impacts associated with geology and soils.

Greenhouse Gas Emissions

Under the No Project Alternative, the project site would remain vacant, and there would be no change in GHG emissions. Therefore, there would be no impacts related to GHG emissions due to construction or increased operational emissions.

Hazardous Materials

If the No Project Alternative is implemented, the proposed project would not be constructed or operated, and the project site would remain vacant. The proposed project includes the removal of the refuse dump on-site, which may contain hazardous materials. Removal of the refuse dump may not occur under the No Project Alternative, therefore, impacts related to hazards or hazardous materials may increase compared to the proposed project.

Hydrology and Water Quality

Under the No Project Alternative, the project site would remain vacant. No development would occur on-site that would alter the hydrology and the project site. Therefore, no impact associated with hydrology and water quality would occur.

Land Use

Under the No Project Alternative, the project site would remain vacant. No changes in land use would occur on-site. Therefore, no land use impacts would occur.

Noise

Under the No Project Alternative, the project site would remain vacant and there would be no change to the existing ambient noise environment. No temporary construction noise or permanent operational noise increases would occur.

Public Services

Under the No Project Alternative, the project site would remain as open space. No changes in demand for public services would occur. However, the project site would also not be developed with a community park, which provides a beneficial public service. Therefore, while there would be no impacts on fire, police, or other public services, impacts on parks may be greater under the No Project Alternative because a new park would not be provided to residents in the area.

Transportation/Traffic

Under the No Project Alternative, the project site would remain vacant. No additional vehicle trips would be generated to or from the project site and no VMT impacts would occur. Therefore, the No Project Alternative would not have any transportation-related impacts.

Tribal Cultural Resources

Under the No Project Alternative, there would be no subsurface ground disturbance that could impact undiscovered TCRs. The No Project Alternative would not have an impact on TCRs.

Utilities and Service Systems

Under the No Project Alternative, the project site would remain vacant. There would be no change in demand on utilities and services systems. The No Project Alternatives would not have an impact on utilities and service systems.

Relationship to Project Objectives

The No Project Alternative would not meet any of the project objectives as no change would be made to the existing land uses at the site.

Conclusion

Because the No Project Alternative would not result in any new development on the site, this alternative would avoid all environmental impacts of the project. This alternative would not, however, meet any of the project's objectives.

7.4.2.2 *No Project – Existing General Plan Development Alternative*

This alternative assumes that the project is not approved and a portion of the project site (1370 Burbank Avenue) is redeveloped consistent with the General Plan designation of *Medium – Density Residential*. The *Medium Density – Residential* designation permits a range of housing types, including single family attached and multifamily developments with a density of 8.0-18.0 units per acre. Thus, development of the 2.61-acre parcel at 1370 Burbank Avenue (APN 125-252-003) would result in approximately 21 to 47 residential units. Associated infrastructure and roadway improvements would also be required to accommodate the residential units. The City of Santa Rosa has an estimated 2.63 persons per household, [65] thus, the 21 to 47 residential units would house approximately 55 to 124 residents.

[65] US Census Bureau Quick Facts website. U.S. Census Bureau QuickFacts: Santa Rosa city, California; California Accessed May 17, 2022.

Comparison of Environmental Impacts

Aesthetics

Under the No Project – Existing General Plan Development Alternative, a portion of the project site would become developed with 21 to 47 residential units and associated infrastructure. Existing trees and vegetation would need to be removed to accommodate the development and the residential units would partially obstruct scenic views at the project site. The No Project – Existing General Plan Development Alternative would result in greater aesthetic impacts than the proposed project.

Air Quality

Development of residential units under the No Project – Existing General Plan Development Alternative would require a longer and more intensive construction phase than the proposed project, resulting in greater air quality impacts from construction equipment emissions. Operation of residential units on-site would also generate a greater number of vehicle trips than the proposed project, resulting in greater tailpipe emissions. Therefore, the No Project – Existing General Plan Development Alternative would result in greater air quality impacts than the proposed project.

Biological Resources

Development of the residential units under the No Project – Existing General Plan Development Alternative would require a greater amount of trees and vegetation to be removed from the project site and would replace a larger portion of the existing open space on-site than the proposed project. Thus, the No Project – Existing General Plan Development Alternative would result in greater impacts to biological resources than the proposed project.

Cultural Resources

Under the No Project – Existing General Plan Development Alternative, there would still be ground disturbing activities during construction of the residential units that could result in the discovery of buried cultural resources. The No Project – Existing General Plan Development Alternative would disturb a greater area given that it would involve more paving than the proposed project. However, any potential impacts to buried cultural resources would be mitigated to a less than significant impact by MM CUL-3.1. Thus, impacts to cultural resources would be equivalent to the proposed project.

Energy

Development of the residential units under the No Project – Existing General Plan Development Alternative would require a longer and more intensive construction phase than the proposed project, resulting in greater energy consumption during the construction phase. Additionally, operation of 21 to 47 residential units on-site would consume more energy on an annual basis than the proposed project. Therefore, the No Project – Existing General Plan Development Alternative would result in greater energy impacts.

Geology and Soils

Development of the No Project – Existing General Plan Development Alternative would introduce a greater number of structures and residents to the project site. However, the project site is not

particularly susceptible to geologic hazards and geotechnical reports would be required prior to construction of the residential structures. Therefore, impacts associated with geology and soils would be less than significant, similar to the proposed project.

Greenhouse Gas Emissions

Development of the residential units under the No Project – Existing General Plan Development Alternative would require a longer and more intensive construction phase than the proposed project, resulting in greater GHG emissions from construction equipment. Operation of residential units on-site would also generate a greater number of vehicle trips than the proposed project, resulting in greater tailpipe emissions. Therefore, the No Project – Existing General Plan Development Alternative would result in a greater GHG emissions impact than the proposed project.

Hazardous Materials

Similar to the proposed project, operation of residential units on-site would not involve the routine transport or use of hazardous materials at the project site with the exception of common cleaning and maintenance products. Construction mitigation measures would be implemented to ensure any hazardous materials encountered on-site are handled properly to protect the health of the construction workers. Thus, impacts associated with hazards and hazardous materials would be equivalent to the proposed project.

Hydrology and Water Quality

Similar to the proposed project, direct impacts to Roseland Creek would be avoided and mitigation measures would be implemented to prevent pollution due to runoff during construction. The No Project – Existing General Plan Development Alternative would result in a greater amount of impervious surfaces on-site and thus, would alter the hydrology of the project site more than the proposed project. The No Project – Existing General Plan Development Alternative would have a slightly greater impact than the proposed project.

Land Use

Similar to the proposed project, the No Project – Existing General Plan Development Alternative would not divide the established community or conflict with existing land use regulations. Land use impacts would be equivalent to the proposed project.

Noise

Development of the No Project – Existing General Plan Development Alternative would require a longer and more intensive construction phase than the proposed project, resulting in greater temporary noise impacts than the proposed project. Operation of residential units on-site would also generate a greater number of vehicle trips than the proposed project, resulting in greater permanent noise impacts. Therefore, the No Project – Existing General Plan Development Alternative would result in a greater noise impact than the proposed project.

Public Services

Development of the No Project – Existing General Plan Development Alternative would result in increased demand for public services by introducing new residents to the project site. Additionally, a new park would not be built on a portion of the site with implementation of the No Project – Existing General Plan Development Alternative. Thus, impacts on public services would be greater than the proposed project.

Transportation/Traffic

As shown in Table 7.4-1, below, the No Project – Existing General Plan Development Alternative would have the potential to result in greater daily vehicle trips than the proposed community park, depending on the level of density of housing that could be developed. The assumed single-family housing trip generation rate is a conservative estimate because the No Project – Existing General Plan Development Alternative could also allow for multi-family housing to be built on-site, which have lower daily trip generation rates. Thus, it is possible that the No Project – Existing General Plan Development Alternative could result in fewer than 444 daily vehicle trips if the site was developed with multi-family housing units rather than single-family units.

Table 7.4-1: Existing General Plan Alternative Trips Comparison

Land Use	Size	Daily Rate	Daily Trips
City Park (Proposed)	4.59 acres	50	230
Single Family Housing (minimum density)	21 units	9.44	198
Single Family Housing (maximum density)	47 units	9.44	444
Source: *Institute of Transportation Engineers' (ITE's) Trip Generation Manual, 10th Edition*			

Tribal Cultural Resources

Under the No Project – Existing General Plan Development Alternative, there would still be ground disturbing activities during project construction that could result in the discovery of buried TCRs. The No Project – Existing General Plan Development Alternative would disturb a greater area given that it would involve more paving than the proposed project. However, any potential impacts to buried TCRs would be mitigated to a less than significant impact by MM CUL-3.1. Thus, impacts to TCRs would be equivalent to the proposed project.

Utilities and Service Systems

Under the No Project – Existing General Plan Development Alternative, residential units on-site would result in a greater increase in demand upon utilities and service systems than the proposed project due to the increased water use and sanitary sewer flows.

Relationship to Project Objectives

Development of a centrally located parcel on the project site with residential land uses would not meet the City's objectives to provide a community park and associated facilities to the residents of Roseland.

Conclusion

Because the No Project – Existing General Plan Development Alternative could be reasonably expected to result in the development of residential units on-site, this alternative would have more intensive impacts, particularly for construction-related impacts. The No Project – Existing General Plan Development Alternative, however, would not result in any foreseeable new significant impacts. The No Project – Existing General Plan Development Alternative would not meet the City's project objectives.

7.4.2.3 *Active Use Master Plan Alternative*

The City and Board of Community Services considered a variety of Master Plan concepts for the park property and sought a wide range of community input on the desired park components and uses. One concept plan that was considered by the Board of Community Services proposed a variety of active park uses including on the northerly three parcels of the park property. This Active Use Master Plan Alternative is shown as Figure 7.4-1.

The Active Use Master Plan Alternative assumes a public gathering area with a restroom and shaded pavilion where the former residence at 1027 McMinn Avenue was located. A universally accessible path/trail network and fitness course would be provided throughout the park property with two bridges crossing Roseland Creek. A semi-circular driveway would be provided from Burbank Avenue in front of the nature center and would provide access to a single large parking lot for the nature center and dog park. A group picnic area and dog park would be provided behind the nature center on the 1370 Burbank Avenue property. An outdoor classroom with benches would be provided within the western portion of 1360 Burbank Avenue. South of Roseland Creek an expanded turf area would be provided with a picnic area along the southern property boundary. Other uses on the 1400 Burbank Avenue property would include sports courts, hydration station, picnic area, restroom, nature-themed play area, and Pomo interpretive area. This Master Plan Alternative would also construct sidewalk along the Burbank Avenue project frontage, on-street parking, and a bike lane.

Source: Draft Roseland Creek Community Park Concept Plan, August 26, 2015.

ACTIVE USE MASTER PLAN ALTERNATIVE

FIGURE 7.4-1

Comparison of Environmental Impacts

Aesthetics

Under the Active Use Master Plan Alternative, the project sight would largely remain open space. However, the project site would become more developed with active uses north of Roseland Creek including a public gathering space, restrooms, and shaded pavilion adjacent to McMinn Avenue. The Active Use Master Plan Alternative would not include any tall structures that would obstruct views at the project site or the surrounding vicinity. Impacts to aesthetics would be equivalent to the proposed project.

Air Quality

Under the Active Use Master Plan Alternative, the project may require additional equipment due to the greater amount of paving that would be required for the trail network and street parking. Thus, construction emissions would be greater compared to the proposed project. Additionally, the Active Use Master Plan Alternative may result in a greater number of vehicle trips to the project site during operation due to the dog park and larger multi-use lawn area. Thus, operational emissions from passenger vehicles would also be greater compared to the proposed project.

Biological Resources

Similar to the proposed project, the Active Use Master Plan Alternative would avoid impacts to the riparian habitat in and surrounding Roseland Creek. The Active Use Master Plan Alternative would avoid tree removal to the extent feasible; however, construction of an outdoor classroom on the 1360 Burbank Avenue property may result in the removal of additional trees to accommodate the proposed seating areas. Unlike the proposed project, the Active Use Master Plan Alternative would remove the existing purple needlegrass habitat on-site. This habitat is considered a potentially sensitive community under CEQA. Removal of this habitat would be a significant impact and require mitigation. Thus, the Active Use Master Plan Alternative would have a greater impact on biological resources than the proposed project.

Cultural Resources

Under the Active Use Master Plan Alternative, there would still be ground disturbing activities during project construction that could result in the discovery of buried cultural resources. The Active Use Master Plan Alternative would disturb a greater area given that it would involve more paving than the proposed project and an increased lawn area. However, any potential impacts to buried cultural resources would be mitigated to a less than significant impact by MM CUL-3.1. Thus, impacts to cultural resources would be equivalent to the proposed project.

Energy

Similar to the proposed project, the Active Use Master Plan Alternative would result in energy consumption during construction and operation. Energy usage during construction could be greater than the proposed project given the greater amount of paving that would be required. Energy usage during operation of the Active Use Master Plan Alternative would be equivalent to operation of the proposed project; however, energy use related to vehicular trips to the site may increase.

Geology and Soils

The same geologic conditions would be present on-site for any project alternative. Similar to the proposed project, the Active Use Master Plan Alternative would introduce a limited number of structures on-site that could cause risk of injury or loss due to geologic hazards. Similar to the proposed project, the Active Use Master Plan Alternative would not exacerbate risks of geologic hazards on-site. Therefore, the Active Use Master Plan Alternative would result in equivalent environmental impacts associated with geology and soils as the proposed project.

Greenhouse Gas Emissions

The Active Use Master Plan Alternative would result in GHG emissions during construction and operation. Construction emissions would be greater than the proposed project given the greater amount of paving and construction that would be required. Operation of the Active Use Master Plan Alternative would also result in greater GHG emissions given that it would generate a greater number of vehicle trips traveling to and from the project site.

Hazardous Materials

Similar to the proposed project, operation of the Active Use Master Plan Alternative would not involve the routine transport or use of hazardous materials at the project site with the exception of common cleaning and maintenance products. Construction mitigation measures would be implemented to ensure any hazardous materials encountered on-site are handled properly to protect the health of the construction workers. Thus, impacts associated with hazards and hazardous materials would be equivalent to the proposed project.

Hydrology and Water Quality

Similar to the proposed project, direct impacts to Roseland Creek would be avoided and mitigation measures would be implemented to prevent pollution due to runoff during construction. The Active Use Master Plan Alternative would result in a greater amount of impervious surfaces on-site and thus, would alter the hydrology of the project site more than the proposed project. The Active Use Master Plan Alternative would have a slightly greater impact than the proposed project.

Land Use

Similar to the proposed project, the Active Use Master Plan Alternative would not divide the established community or conflict with existing land use regulations. Land use impacts would be equivalent to the proposed project.

Noise

The Active Use Master Plan Alternative would result in an increase in temporary and permanent noise during construction and operation of the project, respectively. Construction noise would increase temporary noise levels adjacent to sensitive receptors given the additional construction on Burbank Avenue and adjacent to McMinn Avenue but would also be subject to similar construction noise mitigation as the proposed project. Operation of the Active Use Master Plan Alternative would

result in a greater permanent noise increase than the proposed project given that it would generate a greater number of vehicle trips traveling to and from the project site.

Public Services

Similar to the proposed project, the Active Use Master Plan Alternative would not introduce any new residents or workers to the project site so as to increase demand upon public facilities. Impacts on public services would be equivalent to the proposed project.

Transportation/Traffic

As a local-serving public facility, the Active Use Master Plan Alternative would screen out from a VMT analysis and would be assumed to have a less than significant VMT impact. While more vehicle trips would be generated than the proposed project, CEQA no longer uses LOS as an impact metric. Therefore, transportation impacts would be equivalent to the proposed project.

Tribal Cultural Resources

Under the Active Use Master Plan Alternative, there would still be ground disturbing activities during project construction that could result in the discovery of buried TCRs. The Active Use Master Plan Alternative would disturb a greater area given that it would involve more paving than the proposed project. However, any potential impacts to buried TCRs would be mitigated to a less than significant impact by MM CUL-3.1. Thus, impacts to cultural resources would be equivalent to the proposed project.

Utilities and Service Systems

The Active Use Master Plan Alternative would result in similar utility demands as the proposed project. Water demand would be greater than the proposed project due to an increase in the irrigated lawn area, however, it would still be a negligible increase in the City's overall water demand and would not necessitate the construction of new water supply facilities. Therefore, impacts to utilities and service systems would only be slightly greater than the proposed project.

Relationship to Project Objectives

Development of a variety of recreational uses throughout the project site would meet most of the City's core project objectives for the proposed park to provide a publicly accessible park space for the local community, develop a park consistent with the existing conservation easements, and provide ADA accessible spaces. The Active Use Master Plan Alternative would not meet the request of local tribes to provide parking near play areas and locations for barbecues and would provide more limited access for emergency vehicles to 1400 Burbank Avenue due to the lack of vehicular access from Burbank Avenue. The Active Use Master Plan Alternative would meet some of the City's full project objectives to provide gathering spaces, provide sport courts and fitness equipment, provide a lawn area, and provide active use amenities.

Conclusion

Although the Active Use Master Plan Alternative would meet many of the City's objectives for the proposed park it would reduce the amount of passive park space provided under the proposed project.

Additionally, this alternative would increase paving, increase water use, and eliminate the purple needlegrass habitat on the site.

7.4.2.4 *Artificial Turf Field Alternative*

This alternative assumes that the proposed multi-use lawn area would be landscaped with artificial turf rather than grass. All other components of the proposed project would remain the same. The intent of this alternative would be to reduce the amount of water use on the project site.

Comparison of Environmental Impacts

Aesthetics

The Artificial Turf Field Alternative would develop the site with a community park as proposed by the project, with the exception of using artificial turf rather than grass for the multi-use lawn area. Aesthetic impacts would be equivalent to the proposed project.

Air Quality

The Artificial Turf Field Alternative would require the same level of construction as the proposed project and would generate the same number of vehicle trips during operation as the proposed project. Emissions from maintenance of the lawn area may be reduced due to the lack of mowing. Therefore, air quality impacts would be slightly reduced compared to the proposed project.

Biological Resources

This alternative would increase impacts to biological resources on the site as the artificial surface would be considered hardscape and may increase the need for mitigation credits. Therefore, impacts to biological resources would be greater than the proposed project.

Cultural Resources

The same level of grading and other ground-disturbing construction activities would occur under the Artificial Turf Field Alternative. Therefore, the potential to impact buried cultural resources would remain the same and impacts to cultural resources would be equivalent to the proposed project.

Energy

The Artificial Turf Field Alternative would require the same level of construction as the proposed project and thus, would consume the same amount of energy during the construction phase. Less energy would be spent during the operational phase given that the artificial turf field would not need to be mowed. Therefore, impacts on energy resources would be less than the proposed project.

Geology and Soils

Under the Artificial Turf Field Alternative, the community park would be constructed in the same location with the same facilities. Therefore, impacts associated with geology and soils would be equivalent to the proposed project.

Greenhouse Gas Emissions

The Artificial Turf Field Alternative would require the same level of construction as the proposed project and would generate the same number of vehicle trips during operation as the proposed project. Emissions from maintenance of the lawn area may be reduced due to the lack of moving. Therefore, GHG emissions impacts would be slightly reduced compared to the proposed project.

Hazardous Materials

Under the Artificial Turf Field Alternative, the community park would be constructed in the same location with the same facilities. Therefore, impacts associated with hazards and hazardous materials would be equivalent to the proposed project.

Hydrology and Water Quality

The artificial turf field would be considered an impervious surface and thus, the Artificial Turf Field Alternative would result in a greater change in the existing hydrology and would create more runoff than the proposed project. LID treatment areas would increase in size for this alternative so that runoff would be captured and treated. Ultimately, hydrology and water quality impacts would be similar to the proposed project.

Land Use

The Artificial Turf Field Alternative would include the same proposed land use as the proposed project. Therefore, land use impacts would be equivalent to the proposed project.

Noise

The Artificial Turf Field Alternative would require the same level of construction as the proposed project and would generate the same number of vehicle trips during operation as the proposed project. Therefore, noise impacts would be equivalent to the proposed project.

Public Services

Under the Artificial Turf Field Alternative, the community park would be constructed in the same location with the same facilities. Therefore, impacts on public services would be equivalent to the proposed project.

Transportation/Traffic

The Artificial Turf Field Alternative would generate the same number of vehicle trips during operation as the proposed project. Therefore, transportation impacts would be equivalent to the proposed project.

Tribal Cultural Resources

The same level of grading and other ground-disturbing construction activities would occur under the Artificial Turf Field Alternative. Therefore, the potential to impact buried TCRs would remain the same and impacts to TCRs would be equivalent to the proposed project.

Utilities and Service Systems

This alternative would reduce water use on the project site by approximately 0.22 afy or 198 gallons per day. The limited water use reduction resulting from this alternative would not substantially lessen any of the less than significant water supply or utility impacts of the project. The resulting reduction in water use would be equivalent to the daily water use of one medium density residential unit.[66] Therefore, impacts on utilities and service systems would be slightly less than the proposed project.

Relationship to Project Objectives

The Artificial Turf Field Alternative would meet all of the objectives of the project as it would only change the type of field provided on the 1400 Burbank Avenue portion of the project site.

Conclusion

Although the Artificial Turf Field Alternative would reduce water usage of 198 gallons per day and would meet all of the project's objectives, an artificial turf field would be considered an impervious surface that would require increased treatment for stormwater runoff and mitigation for biological resources.

7.4.2.5 *Neighborwood Master Plan Alternative*

The Neighborwood Master Plan Alternative is based on a proposal submitted to the City by a citizens' group as an alternative to the City's proposed Master Plan (refer to Figure 7.4-2). This alternative assumes development of one, 12-space parking lot adjacent to a smaller nature center at 1370 Burbank Avenue and a native plant greenhouse/nursery. This alternative includes a secondary emergency vehicle access at 1400 Burbank Avenue but would not include any parking spaces in the park south of Roseland Creek. The area south of the creek would also include a children's play area, two picnic tables, and upland habitat restoration with native plants to replace the lawn area. On the northerly end of the park property near Burbank Avenue, three seasonal wetlands would be constructed, and additional upland habitat restoration would occur in the non-native grassland area on this portion of the site. The trail network for this alternative would be similar to the proposed project.

Comparison of Environmental Impacts

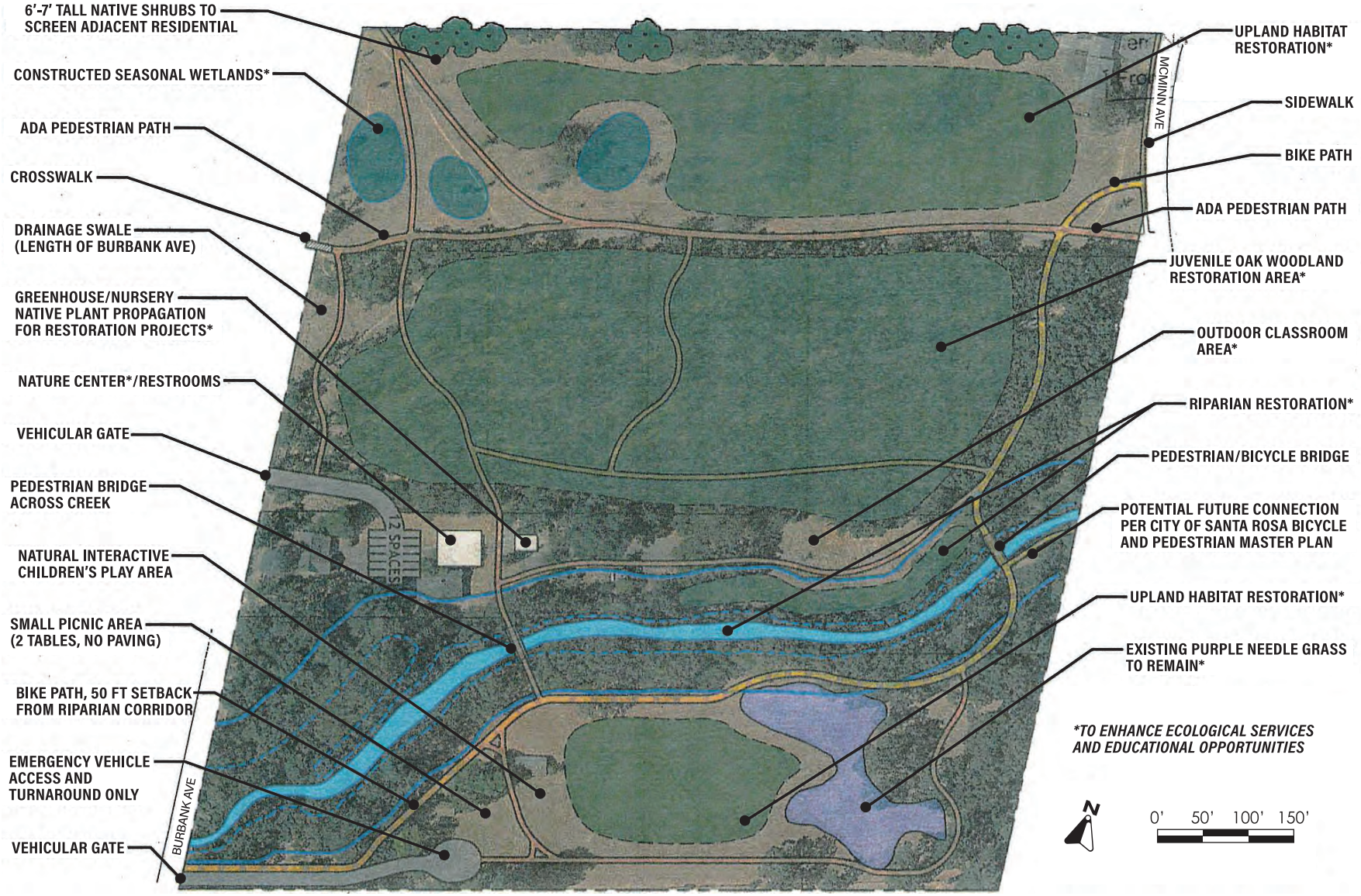
Aesthetics

This alternative would result in a reduced number of improvements on the site and thus, would result in slightly less aesthetic impacts than the proposed project.

Air Quality

This alternative would result in a reduced number of improvements on the site and would minimize both construction period and operational air quality impacts given more limited construction activity and reduced vehicular access to the site.

[66] City of Santa Rosa. Water Master Plan Update. August 2014. Table ES-4.



Source: Roseland Creek Neighborwood Preserve Master Plan Proposal, July 2019.

NEIGHBORWOOD MASTER PLAN ALTERNATIVE | FIGURE 7.4-2

Biological Resources

The construction of trail improvements, two bridge crossings, reduced parking, and elimination of the sport court would require similar mitigation measures for biological resources but would reduce those impacts slightly. The constructed seasonal wetlands would result in increased temporary construction impacts on the northernmost parcel on the site. Based on the site hydrology and soil types, imported soil would be necessary and construction of conveyance features would be needed to supply water to the proposed wetland areas.

Cultural Resources

This alternative would result in a reduced number of improvements on the site and would disturb a smaller area during construction. Thus, there would be a slightly smaller potential to encounter buried cultural resources on-site. Mitigation measures would ensure that any resources encountered are properly handled. This alternative would result in slightly less impacts on cultural resources than the proposed project.

Energy

This alternative would result in a reduced number of improvements on the site and would minimize both construction period and operational energy consumption given more limited construction activity, elimination of the second restroom, and reduced vehicular access to the site.

Geology and Soils

This alternative would involve developing a community park at the same site as the proposed project, thus, impacts associated with geology and soils would be equivalent to the proposed project.

Greenhouse Gas Emissions

This alternative would result in a reduced number of improvements on the site and would minimize both construction period and operational GHG emissions given more limited construction activity, elimination of the second restroom, and reduced vehicular access to the site.

Hazardous Materials

This alternative would involve developing a community park at the same site as the proposed project, thus, impacts associated with hazards and hazardous materials would be equivalent to the proposed project.

Hydrology and Water Quality

This alternative would also reduce impervious surfaces on the site given the lack of a sport court and reduced number of parking spaces including ADA-compliant parking spaces on the site.

Land Use

This alternative would involve the same land use as the proposed project, therefore, it would have equivalent land use impacts as the proposed project.

Noise

Construction period noise impacts would also be reduced given the reduction in amenities on the site, however, similar mitigation measures would be required during the construction period. Vehicular trips to the site, including associated noise, would also be reduced due to the limited number of parking spaces and reduction in amenities proposed on the site.

Public Services

This alternative would redevelop the site with a community park, similar to the proposed project. Impacts on public services would be equivalent to the proposed project.

Transportation/Traffic

This alternative would provide less vehicle parking and would generate fewer vehicle trips to and from the project site. Therefore, this alternative would have lesser transportation impacts than the proposed project.

Tribal Cultural Resources

This alternative would result in a reduced number of improvements on the site and would disturb a smaller area during construction. Thus, there would be a slightly smaller potential to encounter buried TCRs on-site. Mitigation measures would ensure that any resources encountered are properly handled. This alternative would result in slightly less impacts on TCRs than the proposed project.

Utilities and Service Systems

Under the Neighborwood Master Plan Alternative, the lawn area and second restroom would be eliminated from the project. Thus, this alternative would result in less demand upon utilities and service systems than the proposed project due to the reduction in water use on the site.

Relationship to Project Objectives

The Neighborwood Master Plan Alternative would provide some recreational opportunities, primarily for residents within walking distance of the site but would not meet the City's core objective of accommodating residents within a one-mile radius due to its reduced number of parking spaces. The Neighborwood Master Plan Alternative would not meet the City's core objectives of providing barbecues and parking in proximity to picnic and play areas. This alternative would provide more limited ADA-compliant features and reduce the variety of amenities available to the community as compared to the proposed project. This alternative would also not meet the City's full project objectives of providing community gardens, fitness equipment and sport court areas, or a lawn or turf area for recreational use. This alternative, therefore, would meet some of the project objectives but to a more limited extent.

Conclusion

The Neighborwood Master Plan Alternative would meet some of the project objectives, primarily with a focus on passive recreational uses. This alternative would reduce the active recreational space on the site and provide more limited access to the park for Roseland area residents within the one-

mile service radius of the park. This alternative would reduce the less than significant impacts of the project due to the decrease in amenities proposed on the site. Based on a review by WRA, the watershed available to supply runoff to the proposed wetland areas would likely be insufficient for these locations to establish wetland characteristics in normal and above average rainfall years. The constructed wetlands proposed in this alternative, therefore, may not be successful.

7.4.2.6 *2010 Concept Plan Alternative*

The 2010 Concept Plan Alternative was an early iteration of the plan for construction of the Roseland Creek Community Park (refer to Figure 7.4-3). The plan was prepared for the City with input from Roseland area residents. The 2010 Concept Plan Alternative would provide a nature center at 1370 Burbank Avenue accessed by a semi-circular driveway with a single, large parking lot. No vehicular access south of Roseland Creek would be provided. A large constructed wetland would be located on the eastern side of 1370 Burbank Avenue with an adjacent outdoor classroom and just north of the Roseland Creek riparian zone. Four smaller constructed wetlands would be located in the northwestern portion of the park. Native grassland restoration areas would be located in the northeastern portion of the site. Trails would be located throughout the park and two bridges would cross Roseland Creek. A large lawn area would be located south of Roseland Creek. A picnic area, restroom, and children's play area would be located between the trail and lawn area on the western side of 1400 Burbank Avenue. An additional picnic area and Pomo Interpretive Village would be located on the east side of the lawn area.

Comparison of Environmental Impacts

Aesthetics

Under the 2010 Concept Plan Alternative, the project sight would largely remain open space. The 2010 Concept Plan Alternative would remove vehicular access to the southern portion of the site. Impacts to aesthetics would be slightly reduced given the elimination of a driveway, parking, and sport court facilities south of Roseland Creek.

Air Quality

Under the 2010 Concept Plan Alternative, the project would result in increased construction activity given the larger lawn area and construction of one large and four smaller wetlands throughout the site. Thus, construction emissions would be greater compared to the proposed project. Vehicular trips to the project site during operation would be similar to the proposed project and, therefore, operational emissions would not be expected to increase compared to the proposed project.

Biological Resources

Similar to the proposed project, the 2010 Concept Plan Alternative would avoid impacts to the riparian habitat in and surrounding Roseland Creek and would avoid tree removal to the extent feasible. However, unlike the proposed project, the 2010 Concept Plan Alternative would remove the existing purple needlegrass habitat on-site. This habitat is considered a potentially sensitive community under CEQA. Removal of this habitat would be a significant impact and would require mitigation. The constructed wetlands would result in increased temporary construction impacts on

Source: Royston Hanamoto Alley & Abey Landscape Architects and Planners, February 25, 2010.

2010 CONCEPT PLAN ALTERNATIVE | FIGURE 7.4-3

the northernmost parcel on the site and at 1370 Burbank Avenue. Based on the site hydrology and soil types, imported soil would be necessary and construction of conveyance features would be needed to supply water to the proposed wetland areas. Based on the removal of the purple needlegrass habitat on-site and the temporary construction impacts for the constructed wetlands, the 2010 Concept Plan Alternative would have a greater impact on biological resources than the proposed project.

Cultural Resources

Under the 2010 Concept Plan Alternative, there would still be ground disturbing activities during project construction that could result in the discovery of buried cultural resources. The 2010 Concept Plan Alternative would result in greater ground disturbance than the proposed project given the larger lawn area and construction of one large and four smaller wetlands throughout the site. Any potential impacts to buried cultural resources would be mitigated to a less than significant impact by MM CUL-3.1. Thus, impacts to cultural resources would be equivalent to the proposed project.

Energy

Similar to the proposed project, the 2010 Concept Plan Alternative would result in energy consumption during construction and operation. Energy usage during construction could be greater than the proposed project given the greater amount of ground disturbance that would be required. Energy usage during operation of the 2010 Concept Plan Alternative would be equivalent to operation of the proposed project.

Geology and Soils

The same geologic conditions would be present on-site for any project alternative. Similar to the proposed project, the 2010 Concept Plan Alternative would introduce a limited number of structures on-site that could cause risk of injury or loss due to geologic hazards. Similar to the proposed project, the 2010 Concept Plan Alternative would not exacerbate risks of geologic hazards on-site. Therefore, the 2010 Concept Plan Alternative would result in equivalent environmental impacts associated with geology and soils as the proposed project.

Greenhouse Gas Emissions

The 2010 Concept Plan Alternative would result in GHG emissions during construction and operation. Construction emissions would be greater than the proposed project given the greater amount of ground disturbance that would be required. Operation of the 2010 Concept Plan Alternative would also result in similar GHG emissions given that it would not generate a greater number of vehicle trips traveling to and from the project site nor increase the number of structures on the site.

Hazardous Materials

Similar to the proposed project, operation of the 2010 Concept Plan Alternative would not involve the routine transport or use of hazardous materials at the project site with the exception of common cleaning and maintenance products. Construction mitigation measures would be implemented to ensure any hazardous materials encountered on-site are handled properly to protect the health of the

construction workers. Thus, impacts associated with hazards and hazardous materials would be equivalent to the proposed project.

Hydrology and Water Quality

Similar to the proposed project, direct impacts to Roseland Creek would be avoided and mitigation measures would be implemented to prevent pollution due to runoff during construction. The 2010 Concept Plan Alternative would result in a reduced amount of impervious surfaces on-site and thus, would reduce the amount of stormwater treatment required for runoff than the proposed project.

Land Use

Similar to the proposed project, the 2010 Concept Plan Alternative would not divide the established community or conflict with existing land use regulations. Land use impacts would be equivalent to the proposed project.

Noise

The 2010 Concept Plan Alternative would result in temporary and permanent noise during construction and operation of the project, respectively. Construction noise would be similar to the proposed project as it would not result in construction activity substantially closer to sensitive receptors and would be subject to the same construction noise mitigation. Operation of the 2010 Concept Plan Alternative would not result in a greater permanent noise increase than the proposed project as it would result in a similar number of vehicle trips traveling to and from the project site.

Public Services

Similar to the proposed project, the 2010 Concept Plan Alternative would not introduce any new residents or workers to the project site so as to increase demand upon public facilities. Impacts on public services would be equivalent to the proposed project.

Transportation/Traffic

As a local-serving public facility, the 2010 Concept Plan Alternative would screen out from a VMT analysis and would be assumed to have a less than significant VMT impact. The 2010 Concept Plan Alternative would not generate greater amounts of vehicular traffic than the proposed project. Therefore, transportation impacts would be equivalent to the proposed project.

Tribal Cultural Resources

Under the 2010 Concept Plan Alternative, there would still be ground disturbing activities during project construction that could result in the discovery of buried TCRs. The 2010 Concept Plan Alternative would disturb a greater area given that it would involve more paving than the proposed project. However, any potential impacts to buried TCRs would be mitigated to a less than significant impact by MM CUL-3.1. Thus, impacts to tribal cultural resources would be equivalent to the proposed project.

Utilities and Service Systems

The 2010 Concept Plan Alternative would result in similar utility demands as the proposed project. Water demand would be greater than the proposed project due to an increase in the irrigated lawn area, however, it would still be a negligible increase in the City's overall water demand and would not necessitate the construction of new water supply facilities. Therefore, impacts to utilities and service systems would only be slightly greater than the proposed project.

Relationship to Project Objectives

Development of a variety of recreational uses throughout the project site would meet most of the City's core objectives for the proposed park by serving residents within a one-mile radius, providing uses consistent with existing conservation easements, and ADA accessible trails. The 2010 Concept Plan Alternative would not meet the City's core objective to provide parking near play areas and locations for barbecues south of Roseland Creek. The 2010 Concept Plan Alternative would meet some of the City's full objectives by providing a large lawn area, picnic areas, and an outdoor classroom. This alternative, therefore, would meet some of the project objectives but to a more limited extent.

Conclusion

The 2010 Concept Plan Alternative would meet some of the project objectives but would result in greater maintenance requirements due to the construction of wetlands on the site. This alternative would also increase the amount of irrigation required due to the larger lawn area and impact the purple needlegrass habitat on the site. Additionally, WRA's review of the potential to construct wetlands on the site showed the watershed available to supply runoff to the proposed wetland areas would likely be insufficient for these locations to establish wetland characteristics in normal and above average rainfall years. The constructed wetlands proposed in this alternative, therefore, may not be successful.

7.4.3 Environmentally Superior Alternative

The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. Based on the above discussion, the environmentally superior alternative to the proposed project is the No Project Alternative because all of the project's significant environmental impacts would be avoided. However, Section 15126.6(e)(2) states that "if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." In addition to the No Project Alternative, the Neighborwood Master Plan Alternative would lessen several of the project's less than significant impacts due to reduced activity on the project site but would not meet all of the City's objectives for the project (refer to Table 7.4-2).

Table 7.4-2: Summary of Project and Project Alternative Impacts							
Impacts	**Proposed Project**	**No Project Alternative**	**No Project Existing GP Development Alternative**	**Active Use Alternative**	**Artificial Turf Field Alternative**	**Neighborwood Master Plan Alternative**	**2010 Concept Plan Alternative**
Aesthetics	LTS	**NI**	LTS	LTS	LTS	LTS	LTS
Agricultural and Forestry Resources	NI	NI	NI	NI	NI	NI	NI
Air Quality	LTS	**NI**	*LTS*	*LTS*	LTS	LTS	LTS
Biological Resources	SM	**NI**	*SM*	*SM*	*SM*	**SM**	*SM*
Cultural Resources	SM	**NI**	SM	SM	SM	**SM**	SM
Energy	LTS	**NI**	*LTS*	*LTS*	LTS	LTS	LTS
Geology and Soils	LTS	**NI**	LTS	LTS	LTS	LTS	LTS
Greenhouse Gas Emissions	LTS	**NI**	*LTS*	*LTS*	LTS	LTS	LTS
Hazards and Hazardous Materials	SM	**NI**	SM	SM	SM	SM	SM
Hydrology and Water Quality	LTS	**NI**	LTS	*LTS*	LTS	**LTS**	**LTS**
Land Use	LTS	**NI**	LTS	LTS	LTS	LTS	LTS
Mineral Resources	NI	NI	NI	NI	NI	NI	NI
Noise	SM	**NI**	*SM*	*SM*	SM	**SM**	SM
Population and Housing	NI	**NI**	LTS	NI	NI	NI	NI
Public Services	LTS	**NI**	*LTS*	LTS	LTS	LTS	LTS

Table 7.4-2: Summary of Project and Project Alternative Impacts							
Impacts	**Proposed Project**	**No Project Alternative**	**No Project Existing GP Development Alternative**	**Active Use Alternative**	**Artificial Turf Field Alternative**	**Neighborwood Master Plan Alternative**	**2010 Concept Plan Alternative**
Recreation	NI	**NI**	LTS	NI	NI	NI	NI
Transportation/Traffic	LTS	**NI**	*LTS*	LTS	LTS	**LTS**	LTS
Tribal Cultural Resources	SM	**NI**	SM	SM	SM	SM	SM
Utilities and Service Systems	LTS	**NI**	*LTS*	*LTS*	LTS	**LTS**	*LTS*
Wildfire	NI	NI	NI	NI	NI	NI	NI
Meets City's Objectives?	Yes	No	No	Partially	Yes	Partially	Partially
Notes: SU = Significant unavoidable impact; SM = Significant impact, but can be mitigated to a less than significant level; LTS = Less than significant impact; and NI = No impact. **Bold** text indicates being environmentally superior to the proposed project where the impact is to a lesser extent. *Italicized* text indicates increased effect with same overall impact as project.							

SECTION 8.0 REFERENCES

The analysis in this Environmental Impact Report is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

Association of Bay Area Governments and Metropolitan Transportation Commission. *Plan Bay Area 2050*. October 21, 2021. Page 20.

ATC. *Limited Phase II Environmental Site Assessment*. October 15, 2018.

BAAQMD. *Final 2017 Clean Air Plan.* April 19, 2017. http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans.

Bay Area Air Quality Management District. CEQA Air Quality Guidelines. Table 3-1, Operational-Related Criteria Air Pollutant and Precursor Screening Level Sizes. Updated May 2017. p. 3-2.

California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed April 29, 2022. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

California Air Resources Board. "The Advanced Clean Cars Program." Accessed June 2, 2022. https://www.arb.ca.gov/msprog/acc/acc.htm.

California Board of Forestry and Fire Protection. *Fire Hazard Severity Zones Maps.* Accessed September 13, 2022. https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/

California Building Standards Commission. "California Building Standards Code." Accessed June 2, 2022. https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo.

California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed April 29, 2022. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.

California Department of Conservation. "Williamson Act." http://www.conservation.ca.gov/dlrp/lca.

California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed April 29, 2022. http://frap.fire.ca.gov/.

California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed May 17, 2022. http://hcd.ca.gov/community-development/housing-element/index.shtml.

California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed June 2, 2022. https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist.

California Emissions Estimator Model. *Appendix D Default Tables*. Table 10.1 Solid Waste Disposal Rates. October 2017.

California Energy Commission (CEC). "2019 Building Energy Efficiency Standards." Accessed June 2, 2022. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

California Energy Commission. "Natural Gas Consumption by County." Accessed June 2, 2022. http://ecdms.energy.ca.gov/gasbycounty.aspx.

California Energy Commission. *2019 Integrated Energy Policy Report*. 2019.

California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed June 2, 2022. http://ecdms.energy.ca.gov/elecbycounty.aspx.

California Environmental Protection Agency. "Cortese List Data Resources." Accessed May 2, 2022. https://calepa.ca.gov/sitecleanup/corteselist/.

California Gas and Electric Utilities. 2020 *California Gas Report.* Accessed June 2, 2022. https://www.socalgas.com/sites/default/files/2020-10/2020_California_Gas_Report_Joint_Utility_Biennial_Comprehensive_Filing.pdf.

California Office of Historic Preservation. "CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6." Accessed April 29, 2022. http://www.ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf.

California State Water Resources Control Board, "Total Maximum Daily Load Program," http://www.swrcb.ca.gov/water_issues/programs/tmdl/303d_lists2006_approved.shtml, viewed May 12, 2022.

CalRecycle. Central Disposal Site – Sonoma County, Revised Solid Waste Facility Permit. February 7, 2020.

City of Santa Rosa. Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Projects Environmental Impact Report. 2016.

City of Santa Rosa. *Sanitary Sewer Master Plan Update*. October 2014.

City of Santa Rosa. *Santa Rosa General Plan 2035.*

City of Santa Rosa. *2020 Urban Water Management Plan.* June 2021.

EBA Engineering. *Phase I Environmental Site Assessment, McCafferty & Barton Property, 1370 Burbank Avenue, Santa Rosa, California*. March 20, 2018.

ECON. *Phase I Environmental Site Assessment, Roseland Creek Community Park, 1400 Burbank Avenue, APN 125-331-001, Santa Rosa, California*. February 19, 2010.

Federal Emergency Management Agency. Flood Insurance Rate Map. Map Number 06097C0736F. October 16, 2012. Accessed May 12, 2022. https://msc.fema.gov/portal/home

Federal Emergency Management Agency. Letter of Map Revision 22-09-0905P-060375. May 4, 2023. https://map1.msc.fema.gov/mipdata/22-09-0905P-060375.pdf?LOC=d6d2290cfff9d57e3aba860480ca5f4b

Harris & Lee Environmental Services. *Phase I Environmental Site Assessment 1027 McMinn Avenue, Santa Rosa, CA 95407*. September 20, 2010.

Justification Report: BAAQMD CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Project and Plans. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-thresholds-2022/justification-report-pdf.pdf?la=en

North Coast Regional Water Quality Control Board, "NPDES Stormwater, Municipal Program", https://www.waterboards.ca.gov/northcoast/water_issues/programs/npdes_stormwater/ , accessed May 12, 2022.

Public Law 110–140—December 19, 2007. *Energy Independence & Security Act of 2007.* Accessed June 2, 2022. http://www.gpo.gov/fdsys/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf.

Santa Rosa Plain Groundwater Sustainability Agency. *Groundwater Sustainability Plan for the Santa Rosa Plain Subbasin. Section 2 – Plan Area, Figure 2-9 County of Sonoma Groundwater Availability Classifications.* January 2022.

Tom Origer & Associates. *Cultural Resources Survey for the Roseland Creek Community Park Project*. January 11, 2011.

Tom Origer & Associates. *Historical Evaluation of the Buildings at 1400 Burbank Avenue Santa Rosa, Sonoma County, California*. May 31, 2011

United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed November 12, 2022. http://www.afdc.energy.gov/laws/eisa.

United States Energy Information Administration. "State Profile and Energy Estimates, 2019." Accessed June 2, 2022. https://www.eia.gov/state/?sid=CA#tabs-2.

United States Environmental Protection Agency. "EPA Actions to Protect the Public from Exposure to Asbestos." Accessed May 2, 2022. https://www.epa.gov/asbestos/epa-actions-protect-public-exposure-asbestos

United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed May 2, 2022. https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act.

United States Environmental Protection Agency. "Superfund: CERCLA Overview." Accessed May 2, 2022. https://www.epa.gov/superfund/superfund-cercla-overview.

United States Environmental Protection Agency. "The 2021 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." November 2021. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1010U68.pdf

US Census Bureau Quick Facts website. U.S. Census Bureau QuickFacts: Santa Rosa city, California; California Accessed May 17, 2022.

US Census Bureau Quick Facts website. U.S. Census Bureau QuickFacts: Santa Rosa city, California; California Accessed May 17, 2022.

WRA Environmental Consultants. *2017. Special-status Plant Survey, Roseland Creek Community Park, Santa Rosa, CA*. July 24, 2017.

WRA Environmental Consultants. *Biological Resources Assessment*. February 2024.

WRA Environmental Consultants. *Tree Survey Report*. October 2019.

W-Trans. *Final Traffic Impact Study for the Burbank Avenue Subdivision Project*. December 11, 2019.

W-Trans. *Traffic Impact Study for the Roseland Area/Sebastopol Road Specific Plan & Annexation*. April 19, 2016.

SECTION 9.0 LEAD AGENCY AND CONSULTANTS

9.1 LEAD AGENCY

City of Santa Rosa
Recreation and Parks Department
Jen Santos, Deputy Director - Parks

9.2 CONSULTANTS

David J. Powers & Associates, Inc.
Environmental Consultants and Planners
Will Burns, AICP, Vice President and Principal Project Manager
Connor Tutino, Project Manager
Ryan Osako, Graphic Artist

ATC Group Services LLC
Hazardous Materials Consultants
Gabe Stivala, P.G., Senior Geologist
Sara E. Bostick, Senior Project Manager

WRA Environmental Consultants
Biological Resources Consultants
Matt Richmond, Principal
Scott Yarger, Associate Plant Biologist, Project Manager
Brian Freiermuth, Senior Wildlife Biologist
Scott Batiuk, Plant Biologist
Rhiannon Korhummel, Plant Biologist
Peter Kobylarz, GIS Specialist

SECTION 10.0 ACRONYMS AND ABBREVIATIONS

ABAG	Association of Bay Area Governments
ACM	Asbestos-Containing Material
ADT	Average Daily Traffic
AFY	Acre-Feet per Year
ALUC	Airport Land Use Commission
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
BMPs	Best Management Practices
Btu	British Thermal Units
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CALUP	Comprehensive Airport Land Use Plan
CAP	Clean Air Plan
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFCs	Chlorofluorocarbons
CFGC	California Fish and Game Code
CGS	California Geological Survey
CH_4	Methane
CNEL	Community Noise Equivalent Level
CNPPA	California Native Plant Protection Act
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalents
CRHR	California Register of Historical Resources

CTS	California Tiger Salamander
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
DNL	Day-Night Level
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
ESA	Endangered Species Act
ESA	Environmental Site Assessment
EV	Electric Vehicle
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FEMA	Federal Emergency Management Agency
FHSZs	Fire Hazard Severity Zones
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHG	Greenhouse Gas
GWh	Gigawatt Hours
GWP	Global Warming Potential
HazMat	Hazardous Materials
HFCs	Hydrofluorocarbons
HI	Hazard Index
HSP	Health and Safety Plan
HVAC	Heating, Ventilation, and Air Conditioning
ITE	Institute of Transportation Engineers
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Development
LOMR	Letter of Map Revision
LOS	Level of Service
LRA	Local Responsibility Area

LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MGD	Million Gallons per Day
MMTCO2e	Million Metric Tons of CO_2e
Mpg	Miles per Gallon
Mph	Miles per Hour
MRP	Municipal Regional Stormwater Permit
MTC	Metropolitan Transportation Commission
N_2O	Nitrous Oxide
NAHC	Native American Heritage Commission
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NO_2	Nitrogen Dioxide
NOD	Notice of Determination
NOP	Notice of Preparation
NO_x	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	Ozone
OITC	Outdoor-Indoor Transmission Class
OPR	The Governor's Office of Planning and Research
PBO	Programmatic Biological Opinion
PCBs	Polychlorinated biphenyls
PDAs	Priority Development Areas
PFCs	Perfluorocarbons
PG&E	Pacific Gas and Electric Company
PM	Particulate Matter
PM_{10}	Coarse Particulate Matter
$PM_{2.5}$	Fine Particulate Matter
PPV	Peak Particle Velocity

RCRA/CERCLA	Resource Conservation and Resource Recovery Act/Comprehensive Environmental Response, Compensation, and Liability Act
REC	Recognized Environmental Condition
RHNA	Regional Housing Need Allocation
ROG	Reactive Organic Gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCS	Sustainable Communities Strategy
SF	Square Feet
SF_6	Sulfur Hexafluoride
SFHA	Special Flood Hazard Area
SHMA	Seismic Hazards Mapping Act
SLIC	Spills, Leaks, Investigations, and Cleanup
SMARA	Surface Mining and Reclamation Act
SMART	Sonoma Marin Area Rail Transit
SMGB	State Mining and Geology Board
SMP	Soil Management Plan
Sonoma Water	Sonoma County Water Agency
SO_x	Sulfur Oxides
SRA	State Responsibility Area
STC	Sound Transmission Class
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminant
TCR	Tribal Cultural Resources
USACE	United States Army Corps of Engineers
USFWS	United State Fish and Wildlife Service
UST	Underground Storage Tank
UWMP	Urban Water Management Plan
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds