Notice of Intent to Adopt a Mitigated Negative Declaration

To:	**Public Agencies, Interested Parties, and Sonoma County Clerk**
Project Title:	**Santa Rosa Creek Trail—Dutton Avenue Access (West Side) Project**
Lead Agency:	**City of Santa Rosa, Transportation and Public Works Department** **69 Stony Circle, Santa Rosa, CA 95401**
Contact:	**Felicia Ong, Assistant Engineer** **Tel: (707) 543-3864, E: fong@srcity.org**
Review Period:	**March 8, 2024, to April 8, 2024**

In accordance with the State CEQA Guidelines, the City of Santa Rosa has prepared this notice to inform agencies and interested parties that it is releasing an Initial Study and Proposed Mitigated Negative Declaration (IS/MND) for the City's Santa Rosa Creek Trail—Dutton Avenue Access (West Side) Project.

Project Description and Location

The City of Santa Rosa plans to implement a new access pathway to the existing Santa Rosa Creek Trail located at the northwest intersection of Dutton Avenue and Santa Rosa Creek within the City of Santa Rosa.

Providing Comments

A 30-day public review period will extend from March 8, 2024, to April 8, 2024. The IS/MND will be available for public review online at http://cippublic.srcity.org/CIPList.html under Project CIP Number 01102 and at the following location:

- Transportation and Public Works, 69 Stony Circle, Santa Rosa

Agencies and interested parties may provide written comments on the IS/MND for the project. Comments may be directed to the attention of Felicia Ong, fong@srcity.org.

After the review period closes, the Santa Rosa City Council will consider a recommendation to adopt the IS/MND for the project during a regularly scheduled public meeting. We encourage you to check the City Council webpage to confirm the date and time of the City Council meeting at the following website address: https://santa-rosa.legistar.com/DepartmentDetail.aspx?ID=17190&GUID=2FBCEAF9-1480-46F3-B6E3-855EC2714EA4#.ZCR6x96b29Y.link

Aviso de Intención de Adoptar una Declaración Negativa Mitigada

---

Para:	**Agencias públicas, partes interesadas y el Secretario del Condado de Sonoma**
Título el proyecto:	**Proyecto del Sendero de Santa Rosa Creek – acceso de Dutton Avenue (lado oeste)**
Agencia principal:	**Ciudad de Santa Rosa, Departamento de Transporte y Obras Públicas** **69 Stony Circle, Santa Rosa, CA 95401**
Contacto:	**Felicia Ong, Ingeniero Asistente** **Tel: (707) 543-3864, E: fong@srcity.org**
Período de revisión:	**8 de marzo de 2024 al 8 de abril de 2024**

De conformidad con las directrices estatales de la ley CEQA, la Ciudad de Santa Rosa ha preparado el presente aviso para informar a las agencias y partes interesadas que está publicando un Estudio Inicial y una propuesta de Declaración Negativa Mitigada (IS/MND) para el proyecto del Sendero de Santa Rosa Creek – acceso de Dutton Avenue (lado oeste).

Descripción y ubicación del proyecto

La Ciudad de Santa Rosa tiene planificado implementar un nuevo camino de acceso al sendero existente de Santa Rosa Creek ubicado en la intersección noroeste de Dutton Avenue y Santa Rosa Creek dentro de la Ciudad de Santa Rosa.

Cómo aportar comentarios

Habrá un período de revisión pública de 30 días desde el 8 de marzo de 2024 hasta el 8 de abril de 2024.El informe IS/MND estará disponible para revisión pública en línea en http://cippublic.srcity.org/CIPList.html con el número CIP 01102 del proyecto y en la siguiente ubicación:

- Transporte y Obras Públicas, 69 Stony Circle, Santa Rosa

Las agencias y las partes interesadas pueden aportar comentarios por escrito sobre el informe IS/MND del proyecto. Los comentarios pueden dirigirse para la atención de Felicia Ong, fong@srcity.org.

Después de que se cierre el período de revisión, el Consejo de la Ciudad de Santa Rosa considerará una recomendación para adoptar el informe IS/MND del proyecto durante una reunión ordinaria pública. Le sugerimos que consulte la página web del Consejo de la Ciudad para confirmar la fecha y hora de la reunión del Consejo en la siguiente dirección web: https://santa-rosa.legistar.com/DepartmentDetail.aspx?ID=17190&GUID=2FBCEAF9-1480-46F3-B6E3-855EC2714EA4#.ZCR6x96b29Y.link

MITIGATED NEGATIVE DECLARATION

Project Title: **Santa Rosa Creek Trail—Dutton Avenue Access (West Side) Project**

Date of Preparation: March 8, 2024, to April 8, 2024

Lead Agency: City of Santa Rosa, Transportation and Public Works

Project Description: The City of Santa Rosa plans to implement a new access pathway to the existing Santa Rosa Creek Trail located at the northwest intersection of Dutton Avenue and Santa Rosa Creek within the City of Santa Rosa.

Project Location: Northwest corner of the intersection of Dutton Avenue and Santa Rosa Creek

General Plan: Low Density Residential. Trail will be in Public Right-of-Way or public easements

Zoning: R-1-6 and Public Right-of-Way. Trail will be in Public Right-of-Way or public easements

Findings:

1. With the incorporation of mitigation measures, this project does not have the potential to degrade the quality of the environment, nor to curtail the diversity of the environment.
2. This project will not have a detrimental effect upon either short-term or long-term environmental goals.
3. This project will not have impacts that are cumulatively considerable.
4. This project will not have environmental impacts that will cause substantial adverse effects on human beings, either directly or indirectly.
   - The proposed project could not have a significant effect on the environment and a Negative Declaration will be prepared.
   - Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A Mitigated Negative Declaration will be prepared.

Public Review Period: March 8, 2024, to April 8, 2024

Mitigation Measures: See Initial Study

Where to Submit Comments: City of Santa Rosa, Transportation and Public Works Department
69 Stony Circle
Santa Rosa, CA 95401

Contact Person: Felicia Ong, Assistant Engineer
(707) 543-3864
fong@srcity.org

Attachment: Initial Study

SANTA ROSA CREEK TRAIL
DUTTON AVENUE ACCESS (WEST SIDE) PROJECT

Santa Rosa, California

Initial Study

March 2024

Prepared for:
City of Santa Rosa
Transportation and Public Works Department
69 Stony Circle
Santa Rosa, CA 95401

Prepared by:
Brelje & Race Engineers
475 Aviation Blvd., Suite 120
Santa Rosa CA 95403
707/576-1322

Contents

Figures

Appendices

PROJECT DATA

Project Title:	Santa Rosa Creek Trail—Dutton Avenue Access (West Side) Project
Lead Agency:	City of Santa Rosa Transportation and Public Works Department 69 Stony Circle Santa Rosa, CA 95401
Contact Person:	Felicia Ong, Assistant Engineer (707) 543-3864 fong@srcity.org
Project Location:	Dutton Avenue at Santa Rosa Creek, Santa Rosa
General Plan Designation:	Low Density Residential. Trail will be in Public Right-of-Way or public easements
Zoning:	R-1-6 and Public Right-of-Way. Trail will be in Public Right-of-Way or public easements

INTRODUCTION

The purpose of this Initial Study is to provide the Lead Agency, the City of Santa Rosa (City), with an assessment of relevant environmental information associated with implementation of the proposed project in order to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report (EIR) will be required for the project. This environmental evaluation is intended to fully inform the Lead Agency, other interested agencies, and the public of the proposed project and associated environmental impacts. This Initial Study has been prepared in conformance with the requirements of §15063 of the 2022 California Environmental Quality Act (CEQA) Guidelines.

If the Lead Agency determines that there is no substantial evidence that the project may cause a significant effect on the environment, then a Negative Declaration may be prepared. A Negative Declaration may include conditions of approval to avoid or reduce potential impacts. However, if the Initial Study determines that the project may cause an unavoidable or unknown significant effect on the environment, the Lead Agency must prepare an EIR.

The Initial Study process also enables the Lead Agency to modify a project, mitigating adverse effects before an EIR is prepared, thereby enabling the project to move forward under a Mitigated Negative Declaration. This facilitates the environmental evaluation portion of the project development process and eliminates unnecessary EIRs.

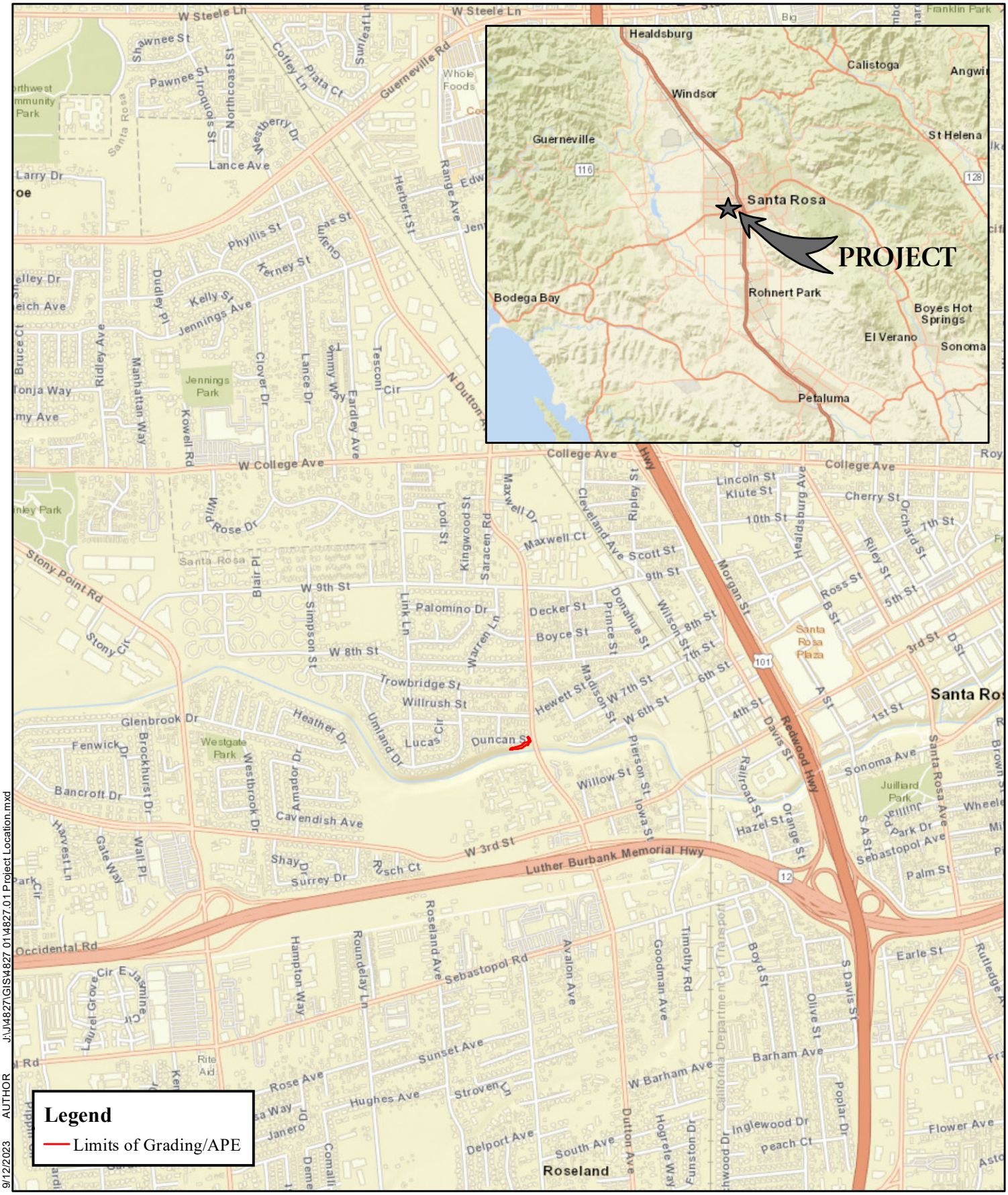
PROJECT SETTING AND BACKGROUND

The proposed Santa Rosa Creek Trail—Dutton Avenue Access Project (Project) is located along the northwest side of Dutton Avenue where it crosses Santa Rosa Creek, south of Hewett Street and north of West 3rd Street in Santa Rosa. Dutton Avenue is a four-lane road separated by a non-raised median in the project area. The road is improved with curb, gutter and sidewalks on both sides. With the exception of the Santa Rosa Creek corridor, the project area is entirely surrounded by developed residential subdivisions.

The existing Santa Rosa Creek Trail (Creek Trail) is a paved multi use trail along the north side of Santa Rosa Creek. Currently, there is only access to the Creek Trail on the northeast side of Dutton Avenue. The project would add an access pathway to the Creek Trail on the northwest side of Dutton Avenue. Implementation of the pathway would improve access to the trail as well as provide safe crossing of Dutton Avenue. The nearest crosswalk across Dutton Avenue is approximately 580 feet to the north at Trowbridge Street or 1,050 feet to the south at W 3rd Street.

The project would occur on property owned by Sonoma Water and a portion of a privately owned residential parcel (APN 010-495-010) located at 408 Duncan Street. Sonoma Water owns the creek channel and maintains access roadways on both sides of the creek to perform channel maintenance. The Santa Rosa Creek corridor in the project area has been channelized for flood control but retains an open bottom and a narrow band of riparian vegetation. An easement through a portion of the privately owned property's existing yard would be required to facilitate the proposed pathway.

The project location is shown on Figure 1. An aerial view of the overall project is shown on Figure 2 and the site plan is shown on Figure 3.



Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

9/12/2023 AUTHOR J:\J\4827\GIS\4827_01\4827_01 Project Location.mxd

FIGURE 1

PROJECT LOCATION

CITY OF SANTA ROSA

SEPTEMBER 2023

Brelje & Race
CONSULTING ENGINEERS

9/7/2023 AUTHOR J:\J\4827\GIS\4827 01\4827.01 Aerial.mxd

Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

NORTH

0 12.5 25 50 Feet

Brelje & Race CONSULTING ENGINEERS

FIGURE 2

PROJECT AERIAL

CITY OF SANTA ROSA

SEPTEMBER 2023

FIGURE 3

SANTA ROSA CREEK TRAIL
DUTTON AVENUE ACCESS

PROPOSED TRAIL ALIGNMENT

JANUARY 2024

POLICY SETTING

Development in the project area and Santa Rosa in general is guided by the City's General Plan[1] and zoning ordinance. The City's General Plan anticipates and plans for growth until 2035. Promoting alternative transportation is a City objective, supported by the General Plan, the 2018 Bicycle and Pedestrian Master Plan and the 2013 Santa Rosa Citywide Creek Master Plan (Creek Master Plan). The project was specifically identified as "Planned Off-Street Entry" number 39 on Map 3 of the Planning Watershed Area: Santa Rosa Creek map contained in the Creek Master Plan. The project is consistent with the policy setting.

PROJECT OBJECTIVES/PURPOSE AND NEED

Provision of the proposed access pathway would facilitate access to the Santa Rosa Creek Trail from both sides of Dutton Avenue, as planned for in the Creek Master Plan. The project would provide additional access to existing alternative transportation and recreational facilities, a long-term goal of multiple City planning documents.

PROJECT DESCRIPTION

The proposed project would add a trail access point to the existing Creek Trail along the northern bank of Santa Rosa Creek by adding a connection from the sidewalk along the west side of Dutton Avenue, as shown on Figure 3. The proposed design seeks to minimize creek cross section impacts and thus any potential to impact high flow conditions within the creek channel. The asphalt pathway connection would traverse a 12-foot grade transition from Dutton Avenue to the existing Creek Trail. The project would also be designed to avoid existing PG&E facilities. The proposed design would require crossing of the adjacent private property for the pathway connection. Right-of-way or easement would be acquired to accommodate the project.

The proposed access pathway segment would be approximately 250 feet long with ADA compliant slopes. It would intersect the existing Creek Trail approximately 230 feet west of the Dutton Avenue bridge over Santa Rosa Creek. The pathway would have an 8-foot paved surface with two feet of paved shoulder on either side for a total width of 12 feet, consistent with Class 1 bike trails. The intersection of the access pathway and the Creek Trail would be repaved to ADA consistent grades. No work would occur south of the existing southern edge of the Creek Trail and the project would not impact the flood channel below the elevation of the existing Creek Trail.

There is an existing PG&E power transmission tower located approximately 46 feet downstream (west) of the Dutton Avenue bridge on the north side of the Santa Rosa Creek channel. The project would avoid impacting the tower by implementing a retaining wall between the access pathway and the transmission tower. The retaining wall would approximately 66 feet in length, with a maximum height of six feet above finished grade.

[1] *Santa Rosa General Plan 2035*. City of Santa Rosa. November 3, 2009.

STOCKPILING

Material stockpiling could occur on the existing creek asphalt paths or the terminus of Duncan Street. Trench spoils would be disposed of according to City standards.

CONSTRUCTION

Construction is anticipated to take approximately four months and begin in summer of 2024. Construction will be conducted by approximately five equipment operators and laborers utilizing the following equipment:

- One track excavator medium to large size
- One earth compactor
- One roller
- One backhoe/loader
- One wheel loader (two-yard bucket)
- One water truck
- One crane truck
- One or two ten-wheel dump trucks

Approximately 1,000 cubic yards of fill and approximately 645 cubic yards of off haul would be required for construction of the access pathway and accommodate 2:1 side slopes. For paving and construction, approximately 70 cubic yards of concrete and base materials would be imported. The retaining wall would be constructed of modular blocks. Exported materials would be stockpiled or disposed of according to regulations by the City or the contractor. Stockpiling would occur within the construction easement or Duncan Street. Approximately 6,900 square feet (0.16 acre) of ground surface would be disturbed during project implementation and approximately 3,400 square feet (0.08 acre) of impervious surface would be placed for the pathway.

Property Acquisition

Work outside of the City right-of-way and Sonoma Water property will occur on one parcel. North of the creek, the access pathway will be partially installed across APN 010-495-010. A permanent easement and a temporary construction easement must be obtained on this parcel.

GROWTH INDUCEMENT POTENTIAL

The proposed project does not induce growth. The project implements a portion of the City's Creek Master Plan and does not include infrastructure that would facilitate growth.

OTHER PUBLIC AGENCY APPROVALS

The project is generally under City review authority. Due to the nature of the project within and adjacent to the Santa Rosa Creek flood channel, it is expected that the following additional agencies could have review or permit authority over the project:

California Department of Fish and Wildlife (CDFW)

The project may require permits from CDFW for potential impacts to riparian habitat and potential to take or otherwise harm state-protected wildlife species.

North Coast Regional Water Quality Control Board

The Regional Board has discretionary authority regarding the following permits and approvals:

- NPDES Permit. The U.S. Environmental Protection Agency (EPA) has delegated responsibility for issuance of Clean Water Act (CWA) NPDES permits to the Regional Water Quality Control Boards within California. These permits are required to ensure protection of surface waters from construction and other land-disturbing activity.
- 401 Water Quality Certification for potential impacts to wetlands or waters.

Sonoma Water

Sonoma Water owns the Santa Rosa Creek channel and oversees flood control operations. The proposed project will require an encroachment permit from Sonoma Water.

Pacific Gas & Electric

The project would partially occur within an existing PG&E easement. The project will require approval from PG&E.

ENVIRONMENTAL SIGNIFICANCE CHECKLIST

The following list of questions is provided by Appendix G of the CEQA Guidelines in order to determine a project's environmental impacts. The checklist utilized herein was updated by the State of California in 2019.

Based on the project description, answers to the questions fall into one of four categories:

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

A "No Impact" response indicates that no impact would result from implementation of the project. A "Less Than Significant Impact" response indicates that an impact would occur, but the level of impact would be less than significant. A "Less Than Significant with Mitigation Incorporation" response indicates that an impact is involved and, with implementation of the identified mitigation measure, such impact would be less than significant. A "Potentially Significant Impact" response indicates that there is substantial evidence that impacts may be significant if mitigation measures are unknown, infeasible, or not proposed. Each response is discussed at a level of detail commensurate with the potential for adverse environmental effect.

The discussion following each checklist consists of a *Setting* section including environmental and regulatory information, an *Analysis* section, a *Cumulative Impacts* discussion, and a section for identification of *Mitigation Measures*, as necessary. The *Analysis* section includes a discussion addressing whether the project would result in potential adverse environmental impacts. All potential impacts have been considered, including on-site and off-site impacts, direct and indirect impacts, construction and operation-related effects, as well as cumulative effects. The *Cumulative Impacts* section presents information regarding the project's potential cumulative impacts and is included in this section. If an impact(s) has been identified and mitigation is required to reduce the impact to a less than significant level, then such measures are contained in the *Mitigation Measures* sections.

I AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Have a substantial adverse effect on a scenic vista?	□	□	□	■
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	□	■	□	□
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	□	■	□	□
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	□	□	□	■

Environmental Setting

The project is located in a developed portion of western Santa Rosa along Dutton Avenue where it crosses Santa Rosa Creek. Dutton Avenue is a four-lane road separated by a central striped median in the project area. The Dutton Avenue Bridge that crosses Santa Rosa Creek provides views of the creek corridor from the sidewalk on the west and east sides. Santa Rosa Creek is channelized in the project area but supports a narrow band of riparian vegetation lined with Sonoma Water access roads on the south side and the Creek Trail along the north side of the channel.

The area is within the central portion of the Santa Rosa Plain and topography is generally flat. There are no vistas in the project area from which the project would be visible. The major sources of light and glare in the project vicinity are from Dutton Avenue street lighting, vehicular traffic and residential development. There are no designated scenic highways in the immediate project area[2].

Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

A scenic vista is generally considered a view of an area that has remarkable scenery or a resource that is indigenous to the area. The project site is not considered to be a scenic vista for the purposes of this

[2] http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/

environmental analysis because it is entirely within a developed area of Santa Rosa along Dutton Avenue. While Santa Rosa Creek and the Creek Trail do provide scenic resources in the project area, they are not characteristic of a scenic vista. The project will not have any significant impact on a scenic vista. The project is intended to provide additional public access to the scenic qualities of Santa Rosa Creek.

The proposed project would not result in the disturbance or elimination of open space area or remove an object of aesthetic value. The project would not result in long-term physical adverse changes to the height or bulk of structures or view blockages along the view shed. The access pathway will result in minor modifications to grades in the area, but they are specifically intended to provide public access to the scenic qualities of the Santa Rosa Creek channel. No obstruction of the limited scenic views in the project area would occur.

Construction activities would create dust, expose soil from excavation and create soil piles from grading, but these activities would cease after construction is complete. Short-term construction impacts associated with the project would not have a significant impact on any scenic vista.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are no scenic highways in close proximity to the project. The City has not designated any scenic corridors in the project vicinity. None of the project elements would be visible from a scenic highway or corridor. Any visual impacts would be short term and limited to the construction phase of the proposed project.

One 18-inch oak and one 20-inch oak would be removed on the north slope of the channel. The trees are located within the flood channel (below the top of the flood channel but above the existing creek trail). The tree loss will be mitigated in accordance with the requirements in the Santa Rosa Tree Ordinance, as described in the Biological Resources section (Mitigation Measure BIO6).

c. In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The project would not significantly degrade the existing visual character of the project area. The project would be installed between the existing creek trail and residential lot and therefore not substantially degrade the existing visual character of the site or surroundings. The project is intended to provide additional public access to the visual character of the Santa Rosa Creek channel. The project would not conflict with zoning regulations in the project area.

Impacts to the scenic quality of the Santa Rosa Creek corridor would generally be limited to the construction window. Removal of the 18- and 20-inch oaks on the north bank will visually alter immediate views from the creek trail. The tree loss will be mitigated in accordance with the requirements in the Santa Rosa Tree Ordinance, as described in the Biological Resources section (Mitigation Measure BIO6).

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The project would not create a new substantial source of light or glare. The project would be constructed below grade with all surfaces restored and no new light sources are proposed.

Cumulative Impacts

There are no adverse cumulative environmental impacts to aesthetic resources resulting from implementation of the proposed project.

Mitigation Measures

Please see Mitigation Measure BIO6 in the Biological Resources section.

II AGRICULTURAL & FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection (CalFire) regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	□	□	□	■
b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	□	□	□	■
c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	□	□	□	■
d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?	□	□	□	■
e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	□	□	□	■

Environmental Setting

The zoning designations in the immediate project area include residential (R-1-6) to the north and Neighborhood Mixed Use (NMU) to the south. Dutton Avenue is to the east. With the exception of Santa Rosa Creek, the project area is entirely developed with residential uses. The project would occur almost entirely within the Santa Rosa Creek flood control channel (above and to the north of the existing creek trail but primarily within the constructed flood channel) or developed backyard. No agricultural zoning is located in the project area. Local zoning is shown on Figure II-1.

REGULATORY SETTING

Farmland Mapping and Monitoring Program

Agricultural lands within the state of California are rated according to soil quality and irrigation status by the Farmland Mapping and Monitoring Program (FMMP). The FMMP produces maps and statistical data used for analyzing impacts on California's agricultural resources. The best quality land is called Prime Farmland, followed by Unique Farmland, Farmland of Statewide Importance, and so on, in decreasing order of importance. The maps are updated every two years with the use of aerial photographs, a computer mapping system, public review, and field reconnaissance.

The project area is designated as Urban and Built-up Land, as shown on Figure II-2.

Williamson Act

Agricultural land in the project area may also be subject to the California Land Conservation Act of 1965, more commonly referred to as the Williamson Act. The Williamson Act enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are lower than normal because they are based on farming and open space uses as opposed to full market value.

Analysis

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

As shown on Figure II-2, the Farmland Mapping and Monitoring Program[3] designates the project site and surrounding areas as Urban and Built-up Land. The proposed access pathway would generally be located within publicly owned land associated with Santa Rosa Creek and the trail does not support farmland. The project would not convert Farmland to non-agricultural uses.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project would be above the developed Creek Trail or within the landscaped area of a private yard that does not support farmland and is not under agricultural production. Zoning designations in the project area are residential in nature and there are no Williamson Act contracts in the project vicinity. The project would not remove any land from agricultural production and would therefore not conflict with agricultural zoning or Williamson Act contracts.

[3] *Sonoma County Important Farmland—2018*. Farmland Mapping and Monitoring Program of the California Resources Agency.

9/12/2023 AUTHOR J:\J\4827\GIS\4827 01\4827.01 Zoning.mxd

Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
Aerial Imagery: CSR GIS (2018)

NORTH

0 75 150 300 Feet

Brelje & Race CONSULTING ENGINEERS

FIGURE II-1

PROJECT AREA ZONING

CITY OF SANTA ROSA

SEPTEMBER 2023

Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
Aerial Imagery: CSR GIS (2018)
California Dept. of Conservation (2016)

NORTH

0 125 250 500 Feet

Brelje & Race CONSULTING ENGINEERS

FIGURE II-2

IMPORTANT FARMLAND

CITY OF SANTA ROSA

SEPTEMBER 2023

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Forest land, as defined by the U.S. Forest Service, includes land at least ten percent of which is stocked by trees of any size, or land formerly having had such tree cover that would be naturally or artificially regenerated. Forest land includes transition zones, such as areas between heavily forested and non-forested lands that are at least ten percent stocked with forest trees and forest areas adjacent to urban and built-up lands.

The project does not propose any activities related to timber harvest nor would it result in the conversion of forest land to non-forest uses. As such, there would be no impact to forest land or conversion of designated land to non-forest uses. The project location is not zoned for and does not currently support timberland nor is it zoned as timber production land by the City, as shown on Figure II-1.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

The project location does not currently support forest land and the project area is developed with residential uses and the Creek Trail within the City limits. The proposed project would not result in any impact to forest land.

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

Because the project would occur in an area that does not currently support agriculture, is within a developed portion of Santa Rosa and is not zoned for agriculture, the project would not impact agricultural resources in the project area or result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

Cumulative Impacts

There are no adverse cumulative environmental impacts to agricultural and forestry resources resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to agricultural and forestry resources have been identified; therefore, no mitigation is required.

III AIR QUALITY

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 following determinations:	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project conflict with or obstruct implementation of the applicable air quality plan?	□	□	■	□
b. Would the project 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?	□	■	□	□
c. Would the project expose sensitive receptors to substantial pollutant concentrations?	□	■	□	□
d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	□	□	□	■

Environmental Setting

BAY AREA AIR BASIN

The project is located in the San Francisco Bay Area Air Basin (BAAB) that consists of the counties surrounding the San Francisco Bay including portions of Sonoma and Solano Counties and all of Napa, Marin, San Francisco, San Mateo, Santa Clara, Alameda and Contra Costa Counties. The local air quality agency is the Bay Area Air Quality Management District (BAAQMD).

REGIONAL CLIMATE

Sonoma County's climate, like much of California, is Mediterranean in nature. Summers are warm and dry, and winters are cool and moist. Local climate variation is typical in Sonoma County. The Santa Rosa area typically has hot, dry summers and cool, wet winters. The average January high is 57 °F with an average low of 37 °F. July average high is 83 °F with an average low of 50 °F, influenced by proximity to the San Francisco Bay and coastal fog. Rainfall predominantly occurs during the months of November through March. The normal historic rainfall average is approximately 32 inches annually.

Regulatory Setting

Air quality in the project vicinity is regulated by several jurisdictions, including EPA, ARB, and BAAQMD. These entities, described below, develop rules, regulations, and policies to attain the goals or directives imposed upon them through legislation.

FEDERAL REGULATIONS

The Clean Air Act

The Federal Clean Air Act (FCAA) required the US EPA to establish National Ambient Air Quality Standards (NAAQS) and also set deadlines for their attainment. Two types of NAAQS have been established: primary standards, which protect public health, and secondary standards, which protect public welfare from non-health-related adverse effects, such as visibility restrictions. The FCAA also required each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The federal Clean Air Act Amendments of 1990 (CAAA) added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. The US EPA has responsibility to review all state SIPs to determine conformance to the mandates of the FCAA, and the amendments thereof, and determine if implementation would achieve air quality goals. If the US EPA determines a SIP to be inadequate, a Federal Implementation Plan (FIP) may be prepared for the nonattainment area that imposes additional control measures. Failure to submit an approvable SIP or to implement the plan within the mandated time frame may result in sanctions being applied to transportation funding and stationary air pollution sources in the air basin.

STATE REGULATIONS

California Clean Air Act

The California Air Resources Board (CARB) is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act of 1988. The California Clean Air Act (CCAA) requires that all air districts in the state endeavor to achieve and maintain California Ambient Air Quality Standards (CAAQS) for ozone, CO, sulfur dioxide (SO2), and nitrogen dioxide (NO2) by the earliest practical date. The CCAA specifies that districts focus particular attention on reducing the emissions from transportation and area-wide emission sources, and the act provides districts with authority to regulate indirect sources. Each district plan is required to either (1) achieve a five percent annual reduction, averaged over consecutive three-year periods, in district-wide emissions of each nonattainment pollutant or its precursors, or (2) provide for implementation of all feasible measures to reduce emissions. Any planning effort for air quality attainment would thus need to consider both state and federal planning requirements.

LOCAL REGULATIONS

Bay Area Air Quality Management District

The BAAQMD is designated by law to adopt and enforce regulations to achieve and maintain ambient air quality standards. The BAAQMD was the first regional agency created by the state in 1955 that regulates stationary sources of air pollution within the BAAB. The District also regulates a variety of other programs such as Spare the Air, state Air Toxic Control Measures (ATCMs) and federal New Source Performance Standards (NSPSs) and open burning. The main purpose of the BAAQMD is to enforce local, state, and federal air quality laws, rules, and regulations in order to maintain the ambient air quality standards (AAQSs) and protect the public from air toxics through local, CARB ATCM, and federal EPA NESHAP-specific control regulations.

Because the Bay Area Air Basin is not an attainment area for all state and federal criteria pollutants, the BAAQMD is required to update its Clean Air Plan. The most recent update is the 2017 Clean Air Plan[4]. The BAAQMD provides the following summary of the Clean Air Plan:

> The 2017 Plan provides a regional strategy to protect public health and protect the climate. To protect public health, the plan describes how the Air District will continue our progress toward attaining all 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 plan defines a vision for transitioning the region to a post-carbon economy needed to achieve ambitious greenhouse gas reduction targets for 2030 and 2050, and provides a regional climate protection strategy that will put the Bay Area on a pathway to achieve those GHG reduction targets.
>
> The 2017 Plan includes a wide range of control measures designed to decrease emissions of the air pollutants that are most harmful to Bay Area residents, such as particulate matter, ozone, and toxic air contaminants; 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.

CRITERIA POLLUTANTS

Pollutants subject to federal ambient standards are referred to as "criteria" pollutants because the US EPA publishes criteria documents to justify the choice of standards. California and Federal standards for criteria pollutants for the year 2017 are shown below.

Pollutant	Averaging Time	State Standard	Federal Primary Standard
Ozone	1-Hour 8-Hour	0.09 ppm 0.07 ppm	-- 0.070 ppm
PM10	Annual 24-Hour	20 ug/m^3 50 ug/m^3	-- 150 ug/m^3
PM2.5	Annual 24-Hour	12 ug/m^3 ---	12 ug/m^3 35 ug/m^3
Carbon Monoxide	8-Hour 1-Hour	9.0 ppm 20.0 ppm	9.0 ppm 35.0 ppm
Nitrogen Dioxide	Annual 1-Hour	0.03 ppm 0.18 ppm	.053 ppm 100 ppb
Sulfur Dioxide	24-Hour 3-Hour 1-Hour	0.04 ppm -- 0.25 ppm	.14ppm -- 75 ppb
Lead	30-Day Avg. Calendar Quarter 3-Month Avg.	1.5 ug/m^3 -- --	-- 1.5 ug/m^3 0.15 ug/m^3

ppm = parts per million

[4] *2017 Clean Air Plan: Spare the Air, Cool the Climate*. BAAQMD. April 9, 2017.

ppb = parts per billion
ug/m^3 = micrograms per cubic meter

MONITORING STATION DATA

Ambient air quality measurements are routinely conducted at nearby air quality monitoring stations. The nearest monitoring station to the project is in Santa Rosa. Both CARB and the US EPA use this type of monitoring data to designate areas according to attainment status for criteria air pollutants established by the agencies. The purpose of these designations is to identify those areas with air quality problems and thereby initiate planning efforts for improvements. The three basic designation categories are nonattainment, attainment, and unclassified. Unclassified is used in an area that cannot be classified based on available information as meeting or not meeting the standards. In addition, the California designations include a subcategory of the nonattainment designation, called nonattainment-transitional. The nonattainment-transitional designation is given to nonattainment areas that are progressing and nearing attainment.

Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The project area is within the BAAQMD. The project would not conflict with or obstruct the BAAQMD's 2017 Clean Air Plan, intended to provide an integrated control strategy to reduce ozone, particulate matter (PM), toxic air contaminants, and greenhouse gases. The project is small in scale and would assist in implementing access to existing alternative transportation (pedestrian and bicycle) served by the existing Creek Trail, consistent with City planning policies.

Because the project would improve access to an existing alternative transportation route, it would not negatively impact the area's attainment status and any impact to the BAAQMD's Clean Air Plan, and Ozone Strategy would generally be beneficial.

b. Would the project 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?

The BAAQMD is responsible for monitoring and reporting air quality data for the county within the Bay Area Air Basin. Both the U. S. Environmental Protection Agency and the California Air Resources Board have established ambient air quality standards for common pollutants. These ambient air quality standards represent safe levels that avoid specific adverse health effects associated with each pollutant, termed criteria pollutants.

The Bay Area Air Basin is currently designated as nonattainment for several state and national ambient air quality standards shown below.

Standard	2020 State Status[5]	2018 Federal Status
Ozone 8-Hour	Nonattainment	Nonattainment
PM2.5	Nonattainment	Nonattainment
PM10	Nonattainment	Unclassified
Carbon Monoxide	Attainment	Unclassified/Attainment
Nitrogen Dioxide	Attainment	Unclassified/Attainment
Sulfur Dioxide	Attainment	Unclassified/Attainment
Sulfates	Attainment	N/A
Lead	Attainment	Unclassified/Attainment
Hydrogen Sulfide	Unclassified	N/A
Visibility Reducing Particles	Unclassified	N/A

The BAAQMD provides useful guidance in assessing the project's potential impacts on attainment status. The BAAQMD's 2017 Air Quality Guidelines[6] establish recommended thresholds of significance for criteria pollutants for project construction and operation for CEQA analysis. The BAAQMD's thresholds are presented below:

BAAQMD Thresholds of Significance	
Criteria Air Pollutants & Precursors	**Construction-related Average Daily Emissions (lb/day)**
Reactive Organic Gases (ROG)	54
Nitrous Oxides (NOx)	54
Particulate Matter (PM10)	82 (exhaust only)
Particulate Matter (PM2.5)	54 (exhaust only)

The Air Quality Guidelines also provide screening levels for projects in Table 3-1, shown below. If the project meets the screening criteria below, the BAAQMD has determined that the project would not result in the generation of operational-related criteria air pollutants and/or precursors that exceed the thresholds of significance shown above.

[5] http://www.arb.ca.gov/desig/adm/adm.htm

[6] *California Environmental Quality Act Air Quality Guidelines*. Bay Area Air Quality Management District. May 2017. Note: BAAQMD thresholds are in the process of being updated. Until that time, the 2017 Guidelines apply.

Table 3-1: Operational-Related Criteria Air Pollutant and Precursor Screening Level Sizes			
Land Use Type	**Operational Criteria Pollutant Screening Size**	**Operational GHG Screening Size**	**Construction-Related Screening Size**
City park	2613 acres (ROG)	600 acres	67 acres (PM10)

The project would represent an approximate one- to two-acre park, per the BAAQMD's lowest park screening criteria. As shown in the screening criteria table above, the project would be well below the magnitude that would require emissions modeling and would be considered less than significant based on the BAAQMD's screening criteria. No further analysis is required.

Construction activities associated with the project have the potential to create localized short-term dust impacts, PM10 and PM2.5. While the project is below screening criteria levels, standard construction dust abatement techniques would further reduce potential PM10 and PM2.5, as prescribed by Mitigation Measure AQ1 that includes feasible control measures, as recommended by the BAAQMD's Basic Construction Mitigation Measures.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

The project would implement an additional public access point to the existing Santa Rosa Creek trail and operation of the project would not alter air quality in any appreciable way. During the construction phase of the project, generation of dust and equipment exhaust can be expected to increase. A portion of this dust would contain PM10 and PM2.5, which are criteria air pollutants regulated at both the federal and state levels. Diesel particulate matter would be emitted by construction equipment and trucks. Equipment operation and trucks also emit nitrogen oxides during construction that contribute to regional ozone levels.

Although demolition, grading, and construction activities would be temporary, they could have the potential to cause both nuisance and health air quality impacts. PM10 and PM2.5 are the pollutants of greatest concern associated with dust and the BAAQMD is designated as nonattainment for both. If uncontrolled, PM10 and PM2.5 levels downwind of the construction area could possibly exceed state standards. Construction activities in the project area could impact residents adjacent to the project. To mitigate air quality impacts associated with exposing sensitive receptors to substantial pollutant concentrations to less than significant levels, Mitigation Measure AQ1 shall be implemented.

There is known lead contaminated soil on the northeast side of Dutton Avenue and Santa Rosa Creek. It is unclear if the fill associated with the lead contamination extends into the project area. This is discussed further in the Hazards and Hazardous Materials section.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people??

The project would not create objectionable odors or other emissions above regulatory thresholds. The project includes a bike and pedestrian access pathway that is not associated with odors.

Cumulative Impacts

There are no adverse cumulative environmental impacts to air quality resulting from implementation of the proposed project.

Mitigation Measures

AQ1

The following Feasible Control Measures, as described by the Bay Area Air Quality Management District, shall be implemented during construction to minimize fugitive dust and emissions:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day or be covered.
- 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 or stabilized as soon as possible. Building slabs shall be poured as soon as possible after grading unless seeding or soil binders are used to stabilize the pad.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 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 visible emissions evaluator.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BBAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

IV BIOLOGICAL RESOURCES

Sol Ecology, Inc. prepared a biological resources report for the project[7]. The purpose of the biological assessment is to review the project in sufficient detail to determine to what extent the proposed action may affect any endangered or threatened species or designated critical habitats and to gather information necessary to complete a review of potential biological resource impacts from development of the proposed project, under CEQA. The Sol Ecology report describes the results of the site survey and assessment of the project site for the presence of sensitive biological resources protected by local, state, and federal laws and regulations. Excerpts of the report are contained in this section.

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	□	■	□	□
b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	□	■	□	□
c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	□	□	□	■
d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	□	□	■	□
e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	□	■	□	□
f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	□	□	□	■

[7] *Biological Resources Report, Dutton Avenue Northwest Access Ramp to the Santa Rosa Creek Trail, Sonoma County, CA*. Sol Ecology. May 2022.

Overview

On February 9, and April 28, 2022, Sol Ecology performed biological resources surveys at the project location. The study area included the proposed project site or "footprint" and surrounding habitat subject to potential indirect effects of the proposed project.

Regulatory Background

The following sections explain the regulatory context of the biological assessment, including applicable laws and regulations that were applied to the field investigations and analysis of potential project impacts.

SENSITIVE BIOLOGICAL COMMUNITIES

Sensitive biological communities include habitats that fulfill special functions or have special values, such as wetlands, streams, or riparian habitat. These habitats are protected under federal regulations such as the Clean Water Act; state regulations such as the Porter-Cologne Act, the California Department of Fish and Wildlife (CDFW) Streambed Alteration Program, and CEQA; or local ordinances or policies such as city or county tree ordinances, Special Habitat Management Areas, and General Plan Elements.

Water of the US

The U.S. Army Corps of Engineers (USACE) 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" and are often characterized by an ordinary high water mark (OHWM). Other 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 USACE under Section 404 of the Clean Water Act.

Waters of the State

The term "Waters of the State" is defined by the State of California's Porter-Cologne Water Quality Control 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 USACE 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 USACE 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.

Streams, Lakes, and Riparian Habitat

Streams and lakes, as habitat for fish and wildlife species, are subject to jurisdiction by CDFW under Sections 1600-1616 of California Fish and Game Code. Alterations to or work within or adjacent to streambeds or lakes generally require a 1602 Lake and Streambed Alteration Agreement. The term "stream", which includes creeks and rivers, is defined in the California Code of Regulations (CCR) as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life [including] watercourses having a surface or subsurface flow that supports or has supported riparian vegetation" (14 CCR 1.72). In addition, the term "stream" can include ephemeral streams, dry washes, watercourses with subsurface flows, canals, aqueducts, irrigation ditches, and other means of water conveyance if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife. "Riparian" is defined as "on, or pertaining to, the banks of a stream." Riparian vegetation is defined as "vegetation which occurs in and/or adjacent to a stream and is dependent on, and occurs because of, the stream itself". Removal of riparian vegetation also requires a Section 1602 Lake and Streambed Alteration Agreement from CDFW.

Other Sensitive Biological Communities

Other sensitive biological communities not discussed above include habitats that fulfill special functions or have special values. Natural communities considered sensitive are those identified in local or regional plans, policies, regulations, or by CDFW. CDFW ranks sensitive communities as "threatened" or "very threatened" and keeps records of their occurrences in its California Natural Diversity Database. Sensitive plant communities are also identified by CDFW. CNDDB vegetation alliances are ranked 1 through 5 based on NatureServe's (2010) methodology, with those alliances ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Impacts to sensitive natural communities identified in local or regional plans, policies, or regulations or those identified by the CDFW or U.S. Fish and Wildlife Service (USFWS) must also be considered and evaluated under CEQA (CCR Title 14, Div. 6, Chap. 3, Appendix G). Specific habitats may also be identified as sensitive in city or county general plans or ordinances.

RELEVANT LOCAL POLICIES, ORDINANCES, REGULATIONS

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 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.

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 2 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 5 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.

METHODS

A literature review, site visit and preliminary wetlands and waters assessment was conducted, as described below.

LITERATURE REVIEW

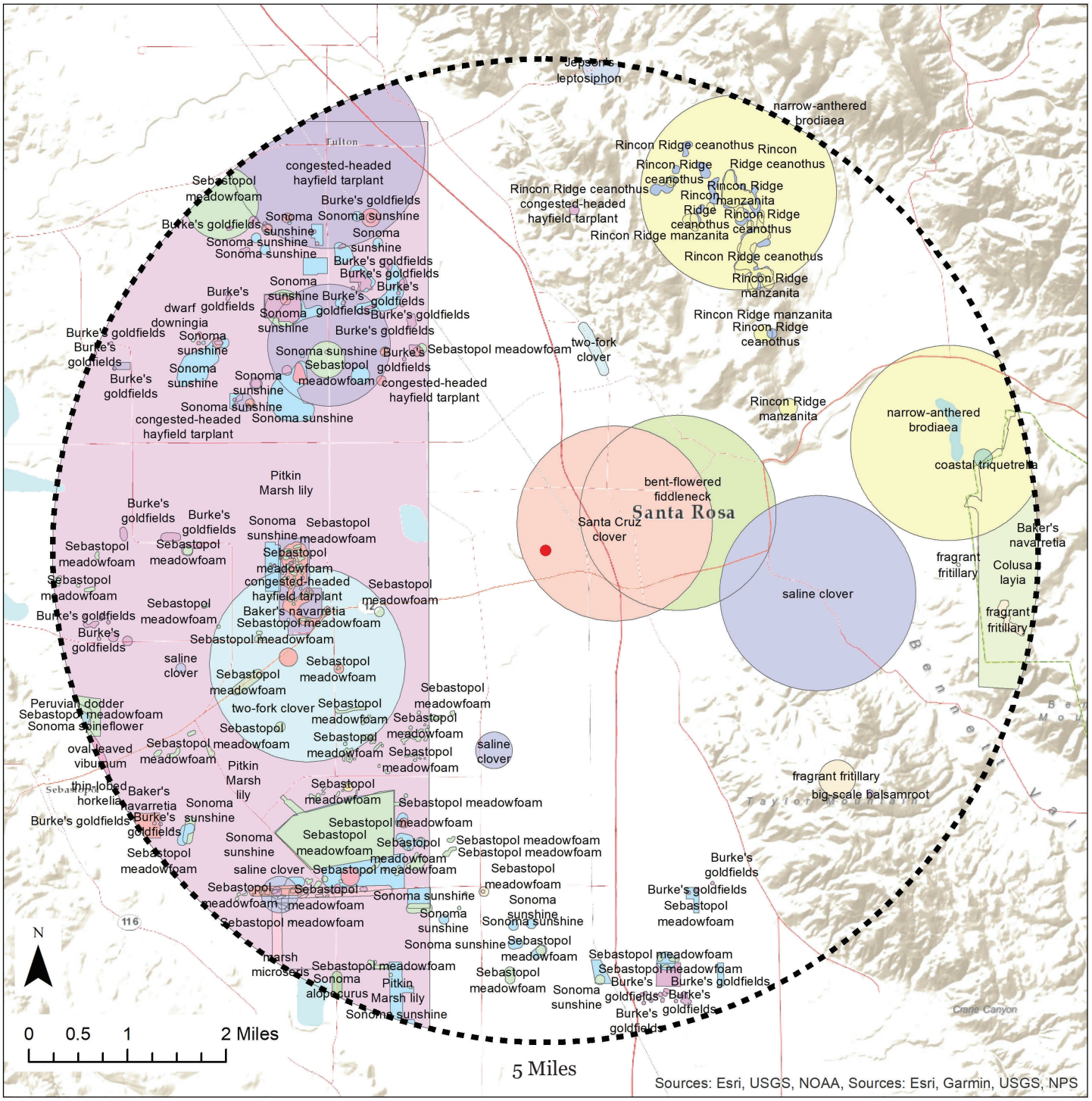
To evaluate whether special status species or other sensitive biological resources could occur in the project site and vicinity, Sol Ecology biologists reviewed the following:

- California Native Plant Society's (CNPS's) A Manual of California Vegetation Online Edition (CNPS 2022a)
- U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory, Wetlands Mapper (USFWS 2022a)
- U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS), Web Soil Survey (USDA 2019)
- Sonoma County Vegetation & LiDAR Data for Sonoma County (Sonoma Veg Project 2014)
- CNPS's Inventory of Rare and Endangered Plants of California search for U.S. Geological Survey (USGS) 7.5-minute Santa Rosa quadrangle and eight adjacent quadrangles (CNPS 2022b)
- California Natural Diversity Database (CNDDB) search for USGS 7.5-minute Santa Rosa quadrangle and eight adjacent quadrangles (CDFW 2022, Appendix D)
- USFWS Information for Planning and Conservation Species Lists (USFWS 2022; Appendix D)
- California Department of Fish and Game (CDFG) publication "California's Wildlife, Volumes I-III" (Zeiner et al. 1990)
- CDFG publication California Bird Species of Special Concern (Shuford and Gardali 2008)
- California Department of Fish and Wildlife (CDFW) and University of California Press publication California Amphibian and Reptile Species of Special Concern (Thomson et al. 2016)
- A Field Guide to Western Reptiles and Amphibians (Stebbins 2003)
- Western Bat Working Group Online Species Accounts (WBWG 2015).

Based on information from the above sources, Sol Ecology developed lists of special status species and sensitive natural communities that could be present in the project vicinity. Figures IV-1 and IV-2 present the results of a 5-mile CNDDB record search around the study area for special status plants and wildlife.

Figure IV-1 **Special Status Plant Species within 5 Miles of the Project Site**

Santa Rosa Creek Trail Dutton Avenue Access, Santa Rosa, CA



Project Location
5-Mile Buffer
Baker's goldfields (1)
Baker's navarretia (8)
Burke's goldfields (20)
Colusa layia (1)
Jepson's leptosiphon (1)
Napa false indigo (1)
Peruvian dodder (1)
Pitkin Marsh lily (3)
Rincon Ridge ceanothus (2)
Rincon Ridge manzanita (4)
Santa Cruz clover (1)
Sebastopol meadowfoam (29)
Sonoma alopecurus (1)
Sonoma spineflower (1)
Sonoma sunshine (14)
bent-flowered fiddleneck (1)
big-scale balsamroot (1)
coastal triquetrella (1)
congested-headed hayfield tarplant (6)
dwarf downingia (9)
fragrant fritillary (5)
legenere (1)
marsh microseris (1)
narrow-anthered brodiaea (2)
oval-leaved viburnum (1)
saline clover (4)
thin-lobed horkelia (1)
two-fork clover (2)

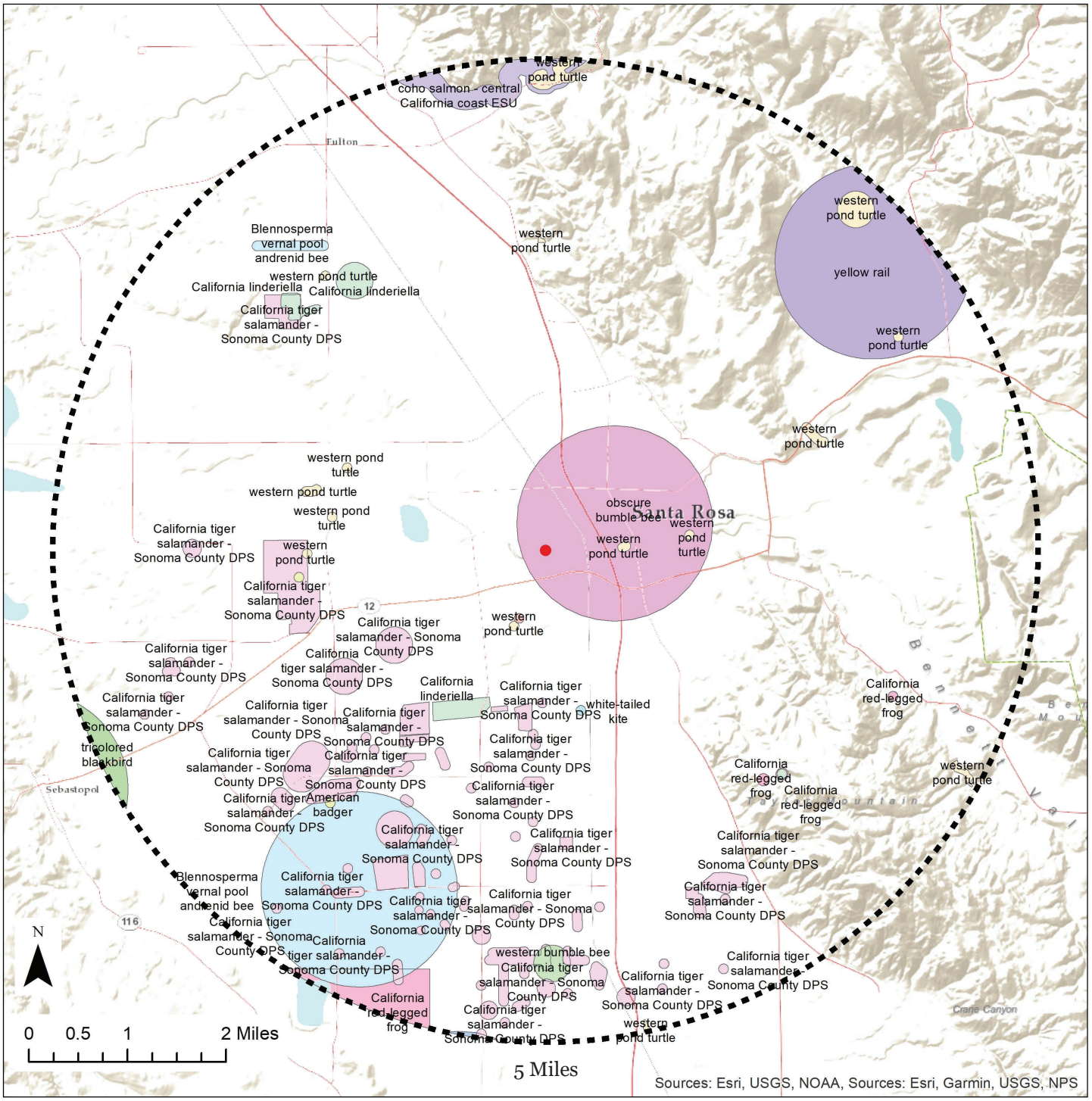
Date: 2-22-2022
Data: Sol Ecology Inc., Sonoma Co., CDFW

Base: ESRI
GIS: LM2204

SOL ECOLOGY
solecology.com

Figure IV-2 **Special Status Animal Species within 5 Miles of the Project Site**

Santa Rosa Creek Trail Dutton Avenue Access, Santa Rosa, CA



- Project Location
- 5-Mile Buffer
- American badger (2)
- Blennosperma vernal pool andrenid bee (2)
- California linderiella (5)
- California red-legged frog (3)
- California tiger salamander - Sonoma County DPS (60)
- Cooper's hawk (1)
- coho salmon - central California coast ESU (1)
- obscure bumble bee (1)
- tricolored blackbird (1)
- western bumble bee (1)
- western pond turtle (15)
- western yellow-billed cuckoo (1)
- white-tailed kite (1)
- yellow rail (1)

Date: 2-22-2022
Data: Sol Ecology Inc., Sonoma Co., CDFW

Base: ESRI
GIS: LM2204

SOL ECOLOGY
solecology.com

FIELD SURVEYS

On February 9, and April 28, 2022, the study area was traversed on foot to determine the potential presence of (1) plant communities both sensitive and non-sensitive, (2) special status plant and wildlife species, and (3) essential habitat elements for any special-status plant or wildlife species.

The study area was evaluated for the presence of sensitive biological communities, including riparian areas, sensitive plant communities recognized by CDFW, County-mapped riparian corridors, habitat connectivity corridors, and scenic corridors. Sensitive communities were identified following A Manual of California Vegetation, Online Edition and includes California Wildlife Habitat Relationships habitat classifications.

Sol Ecology biologists performed reconnaissance-level surveys for special status species on and adjacent to the study area on February 9 and April 28, 2022. The focus of the surveys was to identify whether suitable habitat elements for each of the special status species documented in the surrounding vicinity are present on the study area or not and whether the project would have the potential to result in impacts to any of these species and/or their habitats either on- or off-site. Habitat elements examined for the potential presence of sensitive plant species included: soil type, elevation, vegetation community, and dominant plant species. For wildlife species, habitat elements examined included the presence of dispersal habitat, foraging habitat, refugia or estivation habitat, and breeding (or nesting) habitat.

In cases where little information is known about species occurrences and habitat requirements, the species evaluation was based on best professional judgment of Sol Ecology biologists with experience working with the species and habitats. If a special-status species was observed during the site visit, its presence is recorded and discussed.

The study area was also surveyed to determine if any wetlands and waters potentially subject to jurisdiction by the U.S Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), or CDFW are present. This preliminary assessment was based primarily on the presence of wetland plant indicators, hydrology, or wetland soils. A preliminary waters assessment was based on the presence of unvegetated, ponded areas or flowing water, or evidence indicating their presence such as a high-water mark or a defined drainage course.

Biological Communities Present

Vegetation communities present in the study area were classified based on existing plant community descriptions described in the California Native Plant Society Online Manual of California Vegetation. However, in some cases it is necessary to identify variants of community types or to describe non-vegetated areas that are not described in the literature. Vegetation communities were classified as non-sensitive or sensitive natural communities as defined by CEQA and other applicable laws and regulations.

Natural communities considered sensitive are those identified in local or regional plans, policies, regulations, or by the CDFW. Sensitive vegetation alliances are ranked 1 through 5 based on NatureServe's (2010) methodology, with those alliances ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Impacts to sensitive natural communities identified in local or regional plans, policies, or regulations or those identified by the CDFW, or USFWS must be considered and evaluated under CEQA. No sensitive natural communities were found in the study area.

NON-SENSITIVE NATURAL COMMUNITIES

Mixed Riparian

Vegetation on the slopes immediately below the study area consist of Mixed Riparian species. The tree canopy layer is dominated by a mix of western sycamore (*Platanus racemosa*), boxelder maple (*Acer negundo*), white alder (*Alnus rhombifolia*) and Californica buckeye (*Aesculus californica*). The understory and shrub layer are dominated by dense thickets of arroyo willow (*Salix lasiolepis*) and Himalayan blackberry (*Rubus armeniacus*). Along the upper margins of Santa Rosa Creek there is also a small occurrence of the diminutive native, herbaceous perennial marsh pennywort (*Hydrocotyle* sp.). According to the CNPS Manual of California Vegetation Online, the species composition above fall within the Alnus rhombifolia Forest & Woodland Alliance which has a State Rarity ranking of S4 and a Global Rarity ranking of G4. Wildlife species observed included Anna's hummingbird (*Calypte anna*), dark-eyed junco (*Junco hyemalis*), lesser goldfinch (*Spinus psaltria*), and American robin (*Turdus migratorius*).

Ruderal/Developed

The majority of the study area is dominated by vegetation that can be classified as a mix of ruderal and developed. In the western extent of the study area there are several planted trees, such as redwood (*Sequoia sempervirens*) and coast live oak (*Quercus agrifolia*), with a mixed understory of herbaceous and woody perennial species that are predominantly non-native weeds such as periwinkle (*Vinca major*), French broom (*Genista monspessulana*), Robert's geranium (*Geranium robertianum*), wild geranium (*Geranium dissectum*), English ivy (*Hedera helix*), Italian arum (*Arum italicum*), fennel (*Foeniculum vulgare*), veldt grass (*Holcus lanatus*), wild oats (*Avena fatua*) and barley (*Hordeum* sp.). The eastern extent of the study area contains a fenced off area with several large plantings of species such as tuña (*Opuntia ficus-indica*) and European olive (*Olea europea*), surrounded by a slope dominated by predominantly non-native weeds associated with marginal and disturbed areas, such as silver wattle (*Acacia dealbata*), Bermuda buttercup (*Oxalis pes-caprae*), California bur clover (*Medicago polymorpha*), hairy bittercress (*Cardamine hirsuta*), ribwort (*Plantago lanceolata*), poison hemlock (*Conium maculatum*) and a couple small patches of native California mugwort (*Artemisia douglasiana*). Wildlife species observed included California scrub-jay (*Aphelocoma californica*), American crow (*Corvus brachyrhynchos*), and house finch (*Haemorhous mexicanus*).

SENSITIVE NATURAL COMMUNITIES

Santa Rosa Creek is non-wetland waters under the jurisdiction of the U. S. and State. The creek and the riparian corridor lining the top of both banks are also under the jurisdiction of the California Department of Fish and Wildlife (CDFW). No jurisdictional wetlands were found within the study area.

SPECIAL-STATUS SPECIES

Special status species include those plants and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the Federal Endangered Species Act (ESA) or California Endangered Species Act (CESA). These acts afford protection to both listed species and those that are formal candidates for listing. Plant species on the California Native Plant Society (CNPS) Rare and Endangered Plant Inventory with California Rare Plant Ranks of 1 and 2 are also considered special status plant species and must be considered under CEQA.

Analysis

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

Results of Sol Ecology's biological assessment specific to special-status species are contained below.

Special Status Plants

Based upon a review of the resources and databases, 64 special-status plant species have been documented within 9-quadrangle search of the study area, of which 28 species have been documented within a five-mile radius (Figure IV-1). Based on the highly disturbed nature of the project area, and abundance of invasive species, it is highly unlikely for any special-status plant species to occur in the study area. In addition, no special-status plant species were observed during botanical surveys.

Species documented in the area are unlikely or have no potential to occur in the study area for one or more of the following reasons:

- Hydrologic conditions (e.g., marsh habitat, seeps, pond habitat) necessary to support the special-status plants do not exist on site.
- Edaphic (soil) conditions (e.g., rocky or clay soils) necessary to support the special-status plants do not exist on site.
- Topographic conditions (e.g., slopes) necessary to support the special-status plants do not exist on site.
- Unique pH conditions (e.g., serpentine) necessary to support the special-status plant species are not present on the study area.
- Associated vegetation communities (e.g., cismontane woodland, chaparral, broadleaved upland forest) necessary to support the special-status plants do not exist on site.

Potential Impacts to Special Status Plants

No special status plants have potential to occur at the project site due to a high degree of disturbance, and the abundance of non-native invasive species that outcompete native plant species. As such, there is no potential for impacts to special status plants.

Special Status Wildlife

In addition to wildlife listed as federal or state endangered and/or threatened, federal and state candidate species, CDFW Species of Special Concern, CDFW California Fully Protected species, USFWS Birds of Conservation Concern, and CDFW Special Status Invertebrates are all considered special status species. Although these species generally have no special legal status, they are given special consideration under CEQA. The federal Bald and Golden Eagle Protection Act also provides broad protections to both eagle species that are roughly analogous to those of listed species. Bat species are also evaluated for conservation status by the Western Bat Working Group (WBWG), a non-governmental entity; bats named as a "High Priority" or "Medium Priority" species for conservation by the WBWG are typically

considered special status and also considered under CEQA; bat roosts are protected under CDFW Fish and Game Code. In addition to regulations for special status species, most native birds in the United States (including non-status species) are protected by the federal Migratory Bird Treaty Act of 1918 (MBTA) and the California Fish and Game Code (CFGC), i.e., sections 3503, 3503.5 and 3513. Under these laws, deliberately destroying active bird nests, eggs, and/or young is illegal.

Fifteen special status wildlife species have been documented within five miles of the study area (Figure IV-2). Based upon a review of the resources and database results and the presence of biological communities described above, the study area has the potential to support only four of these species, Species with potential to occur in the study area are described in more detail below. A discussion of potential impacts or unlikelihood for impacts to occur is also provided.

Special Status Animals with Potential to Occur within the Project Site			
Species	**Status**	**Habitat Requirements**	**Potential for Occurrence**
Amphibians and Reptiles			
California tiger salamander *Ambystoma californiense*	FE, ST, CH	Inhabits grassland, oak woodland, ruderal, and seasonal pool habitats. Adults are fossorial and utilize mammal burrows and other subterranean refugia. Breeding occurs primarily in vernal pools and other seasonal water features.	**None*.** The Project is within an area designated as developed that has no potential for impact to this species (USFWS 2020).
Western pond turtle *Emys marmorata*	SSC	A thoroughly aquatic turtle inhabiting ponds, marshes, rivers, streams, and irrigation ditches usually where aquatic vegetation is present.	**Low potential.** This species has been observed in Santa Rosa Creek. The nearest CNDDB record to the study area is for a turtle found in 2007 approximately 0.9 miles upstream. Pond turtles could occur in the creek corridor but not in the upper banks.
Birds			
Nuttall's woodpecker *Dryobates nuttallii*	BCC	Inhabits oak woodlands, wooded suburban areas and riparian corridors. Nests in cavities of primarily oaks, willows, cottonwoods, sycamores, or alders.	**Moderate potential.** There are numerous suitable nest trees for this species in the riparian corridor.
Oak Titmouse *Baeolophus inornatus*	BCC	Inhabit oak woodlands or oak-pine woodslands. Nests cavities high in trees (20 to 40 feet above the ground).	**Moderate potential.** There are numerous suitable nest trees for this species in the riparian corridor.
*** Due to the sensitivity of this species in Sonoma County, an evaluation has been included.**			

The remaining species found in the review of background literature were determined to be unlikely to occur due to absence of suitable habitat elements in and immediately adjacent to the project site. Habitat elements that were evaluated but found to be absent from the immediate area of the project site or surrounding habitats subject to potential indirect effects include the following:

- No suitable burrows on or adjacent to the project site (e.g. for burrowing owl or American badger);
- No coniferous forest, seasonal wetlands, freshwater marsh, oak woodland, or annual grassland communities are present;

- No suitable roosting habitat such as barns, old buildings, or large snags (e.g. for Townsend's big-eared bat or other colonial species).

Potential Impacts to Special Status Animals

The proposed project has the potential to affect four special status wildlife species if present during proposed activities, including: California tiger salamander, western pond turtle, Nuttall's woodpecker and oak titmouse. Potentially significant effects to special status wildlife are described below along with measures to ensure potential effects are mitigated to a less than significant level.

California Tiger Salamander (*Ambystoma californiense*) – Sonoma County Distinct Population Segment. Federal Endangered Species. State Threatened Species. The California Tiger Salamander (CTS) Sonoma County Distinct Population Segment (DPS) was emergency listed as endangered on July 22, 2002. Critical Habitat for CTS on the Santa Rosa Plain was designated in July 2011 and revised on August 31, 2011. This population is geographically isolated from other CTS in the state and known to occur in the Santa Rosa area (or Plain) and possibly the Petaluma River watershed, historically. CTS in the Santa Rosa Plain inhabit low-elevation (below 500 feet) vernal pools and seasonal pools, associated grassland, and the grassy understory of oak savannah plant communities.

On June 11, 2020, the USFWS issued a Programmatic Biological Opinion (PBO) for USACE permitted projects that may affect CTS within the Santa Rosa Plain area which replaced a November 9, 2007 PBO for the same purposes. The PBO prescribes graduated mitigation ratios based on distance known breeding sites and adult occurrences. Mitigation requirements apply to the entire project site except for existing hardscape (e.g., parking lots, compacted gravel surfaces, buildings, or other structures), unless these areas function as a movement corridor in which case such functions must be preserved.

The nearest occurrences of CTS are 1.6 miles south of the study area in an area south of State Route 12, and U.S. Route 101 where numerous CTS have been recorded. Other records within a 3.1-mile radius include occurrence 7 which is approximately 2.6 miles west of the study area. However, the Project is not within the boundaries of the Santa Rosa Plain as shown in the Figure 2 Sonoma California Tiger Salamander Distribution Map (USFWS 2020). The study area is not located within designated critical habitat for CTS and is located in area designated as Already Developed (no potential for impact) in Figure 3 Santa Rosa Conservation Strategy Map. Therefore, there is no potential for CTS to occur in the study area.

Western Pond Turtle (*Emys marmorata*) CDFW Species of Special Concern. The western pond turtle is the only native freshwater turtle in California. This turtle is uncommon to common in suitable aquatic habitat throughout California, west of the Sierra-Cascade crest and Transverse Ranges. Western pond turtles inhabit perennial aquatic habitats, such as lakes, ponds, rivers, streams, and canals that provide submerged cover and suitable basking structures, such as rocks and logs. Western pond turtles prefer to nest on unshaded upland slopes close to their aquatic habitat, and hatchlings require shallow water with relatively dense emergent and submergent vegetation for foraging for aquatic invertebrates. Pond turtles are known to occur in Santa Rosa Creek. The nearest CNDDB record to the study area is for a turtle found in 2007 approximately 0.9 miles upstream. Pond turtles could occur in the creek corridor but not in the upper banks where the project will take place. The banks of the creek are too steep for turtles to ascend.

There is no friable soil along the upper banks, therefore no suitable breeding habitat is present. There is a very low potential for this species to occur in the study area.

Nuttall's woodpecker (*Picoides nuttallii*). USFWS Bird of Conservation Concern. Nuttall's Woodpecker, common in much of its range, is a year-round resident throughout most of California west of the Sierra Nevada. Typical habitat is oak or mixed woodland, and riparian areas. Nesting occurs in tree cavities, principally those of oaks and larger riparian trees. Nuttall's woodpecker also occurs in older residential settings and orchards where trees provide suitable foraging and nesting habitat. This species forages on a variety of arboreal invertebrates. There are a variety of riparian trees along Santa Rosa Creek in the study area that provide suitable nesting habitat for Nuttall's woodpecker, therefore there is a moderate potential for it to nest in the area.

Oak Titmouse (*Baeolophus inornatus*), USFWS Bird of Conservation Concern. This relatively common species is year-round resident throughout much of California including most of the coastal slope, the Central Valley, and the western Sierra Nevada foothills. In addition, the species may also occur in residential settings where landscaping provides foraging and nesting habitat. Its primary habitat is woodland dominated by oaks. Local populations have adapted to woodlands of pines and/or junipers in some areas. The oak titmouse nests in tree cavities, usually natural cavities or those excavated by woodpeckers, though they may partially excavate their own. Seeds and arboreal invertebrates make up the birds' diet. There are numerous oak trees along Santa Rosa Creek in the study area that provide suitable nesting habitat for Nuttall's woodpecker, therefore there is a moderate potential for it to nest in the area.

Four special status wildlife species have a low to moderate potential for occurrence on the site. As such, no significant impacts are anticipated, and thus no mitigation measures are provided specific to those species. However, measures to reduce impacts to protected biological resources, as described below are included in Mitigation Measures BIO1 and BIO2.

The study area provides an abundance of nesting habitat for birds protected by the federal Migratory Bird Treaty Act and California Fish and Game Code § 3513. Impacts to nesting birds resulting in nest abandonment or direct mortality to chicks or eggs is considered a significant impact under CEQA. Mitigation Measure BIO1 provides preconstruction nesting bird surveys to reduce potential impacts to nesting birds to less than significant.

The trees in the riparian corridor could provide suitable habitat for bat species that roost in tree cavities and vegetation. As stated above bats designated for high, or medium priority conservation status of by the Western Bat Working Group are typically considered special status and are also considered under CEQA; bat roosts are protected under CDFW Fish and Game Code. Mitigation Measure BIO2 provides preconstruction roosting bat surveys to reduce potential impacts to roosting bats to less than significant.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Santa Rosa Creek is a non-wetland water of the U.S. and a tributary to the Russian River, a traditional navigable water (TNW). Santa Rosa Creek is subject to USACE jurisdiction within ordinary high water due to its connection to a TNW and is also subject to Regional Board jurisdiction. The project would

not occur in USACE jurisdiction. Activities that result in the substantial modification of the bed, bank, or channel of a stream or lake requires a Streambed Alteration Agreement from CDFW pursuant to Sections 1600-1607 of the California Fish and Game Code. On streams, creeks and rivers, the extent of CDFW jurisdiction extends from the top of bank to top of bank or the outer limits of the riparian canopy, whichever is wider.

The project is located immediately upslope and adjacent to Santa Rosa Creek. Although no work will occur within the creek channel, portions of it are located within the riparian corridor of the creek and may be subject to Regional Board and CDFW jurisdiction. The project will occur at and above the elevation of the existing Creek Trail and that area does not support continuous riparian vegetation north of the trail. However, it is advisable that a 401 Water Quality Certification application be submitted to the Regional Board and a 1602 Streambed Alteration Agreement notification be submitted to the CDFW. Mitigation Measure BIO3 includes consultation requirements with the Regional Board and CDFW to determine the need for permits and secure them, if necessary.

Due to the project's location adjacent to Santa Rosa Creek, best management practices are provided in Mitigation Measure BIO4 and BIO5 to provide for worker awareness training and additional erosion control measures to protect the creek.

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

Santa Rosa Creek is a non-wetland water of the U.S. and a tributary to the Russian River, a traditional navigable water (TNW). Work within Santa Rosa Creek would subject to USACE jurisdiction due to its connection to a TNW. The project will occur above ordinary high water and is not subject to USACE permitting. The project area was surveyed for wetlands during preparation of the biological resources report. No wetlands are present within the project area.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Santa Rosa Creek provides a wildlife corridor for numerous native and non-native aquatic species. It also provides a continuous corridor for terrestrial species both through the creek bed and the riparian corridor where barriers are absent. The project will not encroach into Santa Rosa Creek and project construction will only temporarily impede the movement of terrestrial species through the area. Therefore, the project is not likely to substantially interfere with the movement of any native species or native nursery site and any impact is less than significant.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Per the City of Santa Rosa's tree ordinance, coast live oaks of a diameter of 18-inches or more are considered heritage trees. A tree removal permit would need to be obtained from the City. The ordinance requires that "for each six inches or fraction thereof of the diameter of a tree which was removed for approval, two trees of the same genus and species as the removed tree, 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 Director, or a fewer number of trees of a larger size if approved by the Director." The project will require the removal of two coast live oak (*Quercus agrifolia*); one is 18-inches in diameter, the other is 20-inches in diameter. The number of trees that would need to be replaced, per the ordinance, would be seven. Tree replacement ratios may differ if resource agency permits are required for the project. Mitigation Measure BIO6 includes tree replacement, consistent with the City tree ordinance.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project does not occur within a Habitat Conservation Plan Natural Community Conservation Plan. The project occurs in an area subject to the 2020 USFWS Programmatic Biological Opinion (PBO) for USACE permitted projects that may affect CTS within the Santa Rosa Plain. However, the Project is not within the boundaries of the Santa Rosa Plain as shown in the Figure 2 Sonoma California Tiger Salamander Distribution Map (USFWS 2020). The study area is not located within designated critical habitat for CTS (County of Sonoma, 2022b) and is located in area designated as Already Developed (no potential for impact) in Figure 3 Santa Rosa Conservation Strategy Map (USFWS 2020). The project will not impact CTS.

Cumulative Impacts

There are no adverse cumulative environmental impacts to biological resources resulting from implementation of the proposed project.

Mitigation Measures

BIO1

Migratory Nesting Bird Surveys: For vegetation removal and construction activities that have the potential to affect nesting birds and raptors, including special status species white-tailed kite (nesting season February 1 to August 31), the following is recommended to ensure potentially significant impacts to nesting birds are reduced to a less than significant level:

- Conduct initial vegetation removal and ground disturbance from September 1 to October 14 when feasible.
- Pre-construction nesting bird surveys should be performed within the study area and within the immediate vicinity of proposed activities.
- If nests are found, a no-disturbance buffer should be placed around the nest until young have fledged or the nest is determined to be no longer active by the biologist. The size of the buffer may be determined by the biologist based on species, ambient conditions, and proximity to project-related activities.

BIO2

Pre-construction Bat Survey: To the extent feasible, tree removal will be performed between April 16 to August 31, outside the maternity season (maternity season is between September 1 and April 15), to avoid the period when maternity bat roosts may be present. If not possible, an acoustic emergence survey shall be

performed to determine if bats are present including any solitary species. If present, the roost shall be avoided until after September 1 to ensure no significant effects to maternity bat roosts occur.

Provided no maternity roost is present, tree removal must be performed using the two-step tree removal process which includes allowing any felled trees or tree limbs to be left overnight prior to removal from the site or onsite chipping to allow any non-maternity roosting bats to exit the roost. Implementation of this measure will ensure potential effects to bat species are less than significant.

BIO3

The City shall consult with the Regional Board and CDFW to determine if a 401 Water Quality Certification 1602 Streambed Alteration Agreement would be required for the project. If permits are determined to be required, the City shall apply for and obtain those permits prior to construction. The City shall comply with permit terms from the Regional Board and CDFW.

BIO4

Worker Awareness Training: Environmental training shall be provided to all persons working on the project site prior to the initiation of project-related activities. Training will include a description of all biological resources that may be found on or near the project site, the laws and regulations that protect those resources, the consequences of non-compliance with those laws and regulations, instructions for inspecting equipment each morning prior to activities, and a contact person if protected biological resources are discovered on the project site.

BIO5

Erosion control materials: To protect water quality, Best Management Practices (BMPs) (e.g., silt fence, fiber rolls) must be placed to prevent construction generated spoil and debris from entering Santa Rosa Creek. All disturbed soil must be stabilized prior to a rain event and post-construction. The area should be hydroseeded with a native plant seed mix composed of species known to occur in the area. Tightly woven fiber netting or similar material shall be used for erosion control or other purposes to ensure amphibian and reptile species do not get trapped. Plastic monofilament netting (erosion control matting) rolled erosion control products, or similar non-natural material should not be used. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds.

BIO6

Tree Replacement: Replacement of trees removed shall be in compliance with the City of Santa Rosa Tree Protection Ordinance. If permits are determined to be required from CDFW or the Regional Board, additional tree mitigation may be required as specified in those permits.

V CULTURAL RESOURCES

Section 15064.5(a) of CEQA includes a broad definition of historical and archaeological resources as follows:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4850 et seq.).
(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:
    (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
    (B) Is associated with the lives of persons important in our past;
    (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
    (D) Has yielded, or may be likely to yield, information important in prehistory or history.
(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	□	■	□	□
b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	□	■	□	□
c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	□	■	□	□

Tom Origer & Associates prepared a Cultural Resources Assessment for the project in April 2022[8]. This section contains excerpts from their report.

The Tom Origer & Associates study was prepared in compliance with Section 106 of the National Historic Preservation Act, as required by the Federal Emergency Management Agency, and CEQA. The purpose of the study was to identify resources that could be eligible for inclusion in the National Register of Historic Places, as outlined in 36 CFR 800, and to identify potential historical resources other than Tribal Cultural Resources. The study included archival research at the Northwest Information Center, Sonoma State University, examination of the library and files of Tom Origer & Associates, and field inspection of the Area of Potential Effect (APE).

Pursuant to Section 106 and the CEQA Guidelines, the goals of this study were to: 1) identify cultural resources within the project's APE; 2) provide an evaluation of the significance of identified resources; 3) determine resource vulnerability to adverse impacts that could arise from project activities; and 4) offer recommendations designed to protect cultural resource values, as warranted.

Environmental Setting

The study area consists of approximately 0.33 acres situated on steeply sloped land with a maximum percent slope of 20 percent. The closest water source is Santa Rosa Creek located approximately 10 meters south of the study area.

The geology of the study area consists of alluvial fan and fluvial deposits that date to the Holocene Epoch (11,700 years ago to the present). Soils within the study area belong to the Yolo series. Yolo soils are well-draining loams, found on alluvial fans and flood plains. In a natural state, these soils support the growth of annual and perennial grasses, forbs, shrubs, wild berries, and scattered oaks. Historically, parcels containing Yolo soils were used for orchards, vineyards, row crops, truck crops, and hay.

Prehistory

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. This diversification of economy appears to be coeval with the development of sedentism and population growth and expansion. Sociopolitical complexity and status distinctions based on wealth are also observable in the archaeological record, as evidenced by an increased range and distribution of trade goods (e.g., shell beads, obsidian tool stone), which are possible indicators of both status and increasingly complex exchange systems.

These horizons or periods are marked by a transition from large projectile points and milling slabs, indicating a focus on hunting and gathering during the Early Period, to a marine focus during the Middle Period evidenced by the number of shellmounds in the Bay Area. The Middle Period also saw more reliance on acorns and the use of bowl-shaped mortars and pestles. Acorn exploitation increased during the Late Period and the bow and arrow were introduced.

[8] *Cultural Resources Study for the Santa Rosa Creek Trail—Dutton Avenue Access Project, Santa Rosa, Sonoma County, California*. Tom Origer & Associates. April 11, 2022.

Prehistoric archaeological site indicators expected to be found in the region include but are not limited to: obsidian and chert flakes and chipped stone tools; grinding and mashing implements such as slabs and hand-stones, and mortars and pestles; and locally darkened midden soils containing some of the previously listed items plus fragments of bone, shellfish, and fire-affected stones.

Ethnography

At the time of Euroamerican settlement, people inhabiting this area spoke Southern Pomo, one of seven mutually unintelligible Pomoan languages belonging to the Hokan language stock. The Southern Pomo's aboriginal territory falls within present-day Sonoma County. To the north, it reaches the divide between Rock Pile Creek and the Gualala River, and to the south it extends to near the town of Cotati. The eastern boundary primarily runs along the western flanks of Sonoma Mountain until it reaches Healdsburg, where it crosses to the west side of the Russian River. Within the larger area that constitutes the Southern Pomo homelands, some bands or tribelets occupied distinct areas. The Makahmo Pomo, or Cloverdale Pomo, was a subdivision of the Southern Pomo that occupied the Big Sulphur Creek drainage, about 12 miles of the Russian River Valley, and portions of the Yorty and Cherry creek drainages west of Cloverdale. Primary village sites of the Southern Pomo were occupied continually, while temporary sites were visited to procure resources that were especially abundant or available only during certain seasons. Sites often were situated near fresh water sources and in ecotones where plant life and animal life were diverse and abundant.

The Southern Pomo population was decimated early in the historic period, especially in the southern part of their territory. Ethnic identity was severely impacted in the region of Santa Rosa and Sebastopol; McLendon and Oswalt reported that the few Southern Pomo speakers remaining in 1976 were from north of Healdsburg.

History

Historically, the study area is within 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 (Hoover et al. 1990:479-480). After Señora Carrillo's death in 1849, the rancho was divided among seven claimants. The study area lies within the part of the rancho confirmed to Julio Carrillo (GLO 1859).

As originally platted, the town of Santa Rosa included the blocks between 1st and 5th streets and between present-day Morgan Street on the west and just beyond E Street to the east (Brewster 1854). Green's Addition was the first expansion of the town, moving the limits northward. Outlying parcels varied in size, tending to increase in acreage as they got further from the town center. The study area is outside of what was originally plotted as Santa Rosa. By 1867, Carrillo is no longer the owner of the land containing the study area (Bowers 1867).

With the end of World War II, Santa Rosa experienced a population boom, much like the rest of the nation. Census data show that the city had 12,605 people enumerated in 1940, and over the next ten years, the number rose to 17,902 (State of California Department of Finance 2011). By 1960, Santa Rosa boasted a population of just over 31,000 people, nearly tripling in size in just 20 years. To accommodate this growth, entire neighborhoods were erected in short order, and the outward movement of families to the suburbs, begun during the late nineteenth century, recommenced with due speed. Much of this growth was bolstered by benefits extended to returning service members and their families. The Servicemen's Readjustment Act of 1944 (also known as the G.I. Bill of Rights) included several programs to ease World War II veterans back

into the local economy while avoiding a return to the pre-war depression. Among those benefits was a military loan guarantee program to help purchase homes. In 1950, homeownership in California had risen 11 percent over the proceeding decade and was at an all-time high of 58 percent by 1960.

The years following World War II brought unprecedented well-being to Americans, and commerce flourished as people grew more comfortable with spending. Immediately after World War II, new commercial buildings generally were in downtown areas and other existing commercial centers. Bolstered by post-war consumer confidence, new housing developments appeared, and with them the need for more schools, new churches, and new commercial enterprises. By the end of the 1950s, new commercial construction was usually located in the new suburbs at the edge of town. In Santa Rosa, Hugh Codding led the way with several housing and commercial developments, including Brookwood Terrace, Town & Country Village, and Montgomery Village. These subdivisions tended to have their own commercial areas, and often social features as well.

Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps).

METHODOLOGY

Native American Contact

A request was sent to the State of California's Native American Heritage Commission (NAHC) seeking information from the Sacred Lands File and the names of Native American individuals and groups that would be appropriate to contact regarding this project. Letters were also sent to the following groups: Cloverdale Rancheria of Pomo Indians of California; Dry Creek Rancheria of Pomo Indians; Federated Indians of Graton Rancheria; Guidiville Indian Rancheria; Kashia Band of Pomo Indians of the Stewarts Point; Rancheria Lytton Rancheria of California; Middletown Rancheria of Pomo Indians of California; Mishewal-Wappo Tribe of Alexander Valley; Muwekma Ohlone Tribe of the SF Bay Area; Pinoleville Pomo Nation; and Robinson Rancheria of Pomo Indians.

The NAHC replied with a letter dated March 19, 2022, which indicated that the Sacred Lands File showed no sacred sites within the township and range of the study area. A list of additional contacts was provided. No other replies have been received as of the date of this document.

Archival Study Procedures

Archival research included examination of the library and project files at Tom Origer & Associates. This research is meant to assess the potential to encounter archaeological sites and built environment within the study area. Research was also completed to determine the potential for buried archaeological deposits.

A review (NWIC File No. 21-1257) was completed of the archaeological site base maps and records, survey reports, and other materials on file at the Northwest Information Center (NWIC), Sonoma State University, Rohnert Park, by Eileen Barrow on February 8, 2022. Sources of information included but were not limited to the current listings of properties on the National Register of Historic Places, California Historical Landmarks, California Register of Historical Resources, and California Points of Historical Interest as listed in the OHP's Historic Property Directory and the Built Environment Resources Directory.

The OHP has determined that structures in excess of 45 years of age could be important historical resources, and former building and structure locations could be important archaeological sites. Archival research included an examination of 19th and 20th-century maps and aerial photographs to gain insight into the nature and extent of historical development in the general vicinity, and especially within the study area.

Ethnographic literature that describes appropriate Native American groups, county histories, and other primary and secondary sources were reviewed.

A model for predicting a location's sensitivity for buried archaeological sites was formulated by Byrd et al. (2017) based on the age of the landform, slope, and proximity to water. A location is considered to have the highest sensitivity if the landform dates to the Holocene, has a slope of five percent or less, is within 150 meters of fresh water, and 150 meters of a confluence. Note: the Holocene Epoch is the current period of geologic time, which began about 11,700 years ago, and coincides with the emergence of human occupation of the area. A basic premise of the model is that archaeological deposits will not be buried within landforms that predate human colonization of the area. Calculating these factors using the buried site model (Byrd et al. 2017: Tables 11 and 12), a location's sensitivity will be scored on a scale of 1-10 and classed as follows: lowest (<1); low (1-3); moderate (3-5.5); high (5.5-7.5); highest (>7.5).

Sensitivity Score[1]	Classification[1]	Probability[2]
<1	Lowest	<1 %
1-3	Low	1-2 %
3-5.5	Moderate	2-3%
5.5-7.5	High	3-5%
>7.5	Highest	5-20%

[1]Byrd *et. al*. 2017
[2]King 2004

Field Survey

An intensive field survey was completed by Eileen Barrow on April 7, 2022. An hour was spent in the field and field conditions were warm and sunny. Surface examination consisted of walking the project area in 5-meter transects in the portions of the study area that were relatively flat to moderately sloping. Some of the study area was steeply sloped and so the slope was examined from the bottom. A hoe was used as needed to expose the ground surface. Ground visibility ranged from good to poor, with vegetation being the primary hindrance. A geotechnical study was being conducted at the time of the fieldwork, and Ms. Barrow examined the spoils from the borings. There were three borings that went to depths of 10, 20, and 16.5 feet, distributed along the proposed pathway.

Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Archival research found that the study area had not been previously subjected to a cultural resources survey. The study area was included in Anne Bloomfield's architectural survey of the city of Santa Rosa, but no important buildings were identified within the study area (Bloomfield 1989). Thirteen studies have been conducted within a quarter-mile of the study area, listed below.

Studies within a Quarter-mile of the Study Area		
Author	**Date**	**S#**
Barrow and Beard	2010	36573
Beard	2001	26342
Beard	2002a	25626
Beard	2002b	27399
Beard	2009	36582
Del Bondio and Origer	2010	37608
DeShazo and Matuk	2018	52239
Origer	1992	13490
Origer	2016	49112
Origer and Fredrickson	1980	2009
Steen and Origer	2006	32767
Stradford and Fredrickson	1977	590
Villemaire and Fredrickson	1988	9732

There are several resources documented within a quarter-mile of the study area. Most of these resources are contributors to three historical districts and will not be individually listed here. The table below lists the three districts, buildings documented outside of these districts, and one isolated biface fragment.

Resources within a Quarter-mile of the Study Area			
Author	**Date**	**P#**	**Distance from Study Area**
Beard	2009	49-004164	940 feet
Castro and Lucido	2014	49-004798	1,000 feet
Hurley	2011	49-003870	1,215 feet
Marvin	1989	49-005632	990 feet
Marvin	1989	49-005662	85 feet
Marvin	1989	49-005718	205 feet
Marvin	1989	49-005635	990 feet
Whatford	1988	49-005698	605 feet

A review of 19th and 20th-century maps shows no buildings within the study area at that time. County records show that the house on the property at 408 Duncan Street was constructed in 1964, but it is outside of the study area. A transmission tower is located within the study area and aerial photos show it was constructed between 1963 and 1977.

The Santa Rosa Flood Control Channel was created after a series of floods in Santa Rosa. Review of maps and aerial photos shows it was created between 1954 and 1968.

The field survey confirmed that there is a transmission tower within the study area. No other buildings exist within the study area. No historical cultural resources were observed.

While the project would not impact known historical resources, there is always the possibility of accidental discovery of historical resources during construction. In the event resources are discovered, mitigation measure CR1 would reduce such impact to less than significant.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Archival research indicated that there are no prehistoric or historical archaeological sites within a quarter mile of the study area. Ethnographer Samuel Barrett reported an ethnographic village in the vicinity of the study area. The village of hūkabet a'wī was on the south bank of Santa Rosa Creek, south of the Northwestern Pacific Depot, which would place it approximately a half-mile east of the study area.

Using Byrd et al.'s analysis of sensitivity for buried sites, parts of the study area have a high sensitivity (5.6) for buried archaeological site indicators. This is because the study area lies on a landform that dates to the Holocene Epoch, is in close proximity to a source of fresh water and has level terrain. Incorporating King's analysis, this sensitivity score corresponds to a 3-5% potential to encounter buried sites within the study area. Parts of the study area lie on a steep bank or in a location that would have been within the creek and so this has a low potential.

No archaeological site indicators were observed during the field survey and no archaeological site indicators were found within the geotechnical borings.

Based on the above, Origer & Associates has determined there would be no impact to existing known archaeological resources. However, there is always the possibility of incidental discovery of archaeological resources during construction. In the event resources are discovered, mitigation measure CR1 would reduce such impact to less than significant.

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

There are no known human remains in the project area. However, the remote possibility exists that human remains could be discovered during construction. In such an event, Mitigation Measure CR2 would reduce such impact to a less than significant level.

Cumulative Impacts

There are no adverse cumulative environmental impacts to cultural resources resulting from implementation of the proposed project.

Mitigation Measures

CR1

The project plans and specifications shall provide that in the event prehistoric-era or historic-era archaeological site indicators are unearthed during the course of grading, excavation and/or trenching, all ground disturbing work in the vicinity of the discovery shall cease and all exposed materials shall be left in place. Prehistoric-era archaeologic site indicators could include chipped chert and obsidian tools and tool manufacture waste flakes, grinding implements such as mortars and pestles, and locally darkened soil containing the previously mentioned items as well as fire altered stone and dietary debris such as bone and shellfish fragments. Historic-era archaeologic site indicators could include items of ceramic, glass and metal, and features such as structural ruins, wells and pits containing such artifacts. After cessation of excavation, the contractor shall immediately contact the City. The City shall contact a qualified professional archaeologist

immediately after the find. Such archaeologist shall conduct an evaluation of significance of the site, and assess the necessity for mitigation and contact local Native American tribes, as appropriate. The contractor shall not resume construction activities until authorization to proceed is received from the City.

CR2

If human remains are encountered during grading, excavation or trenching, all construction activity shall cease and the contractor shall immediately contact the City and the Sonoma County Coroner's Office. If the remains are determined by the Coroner's Office to be of Native American origin, the Native American Heritage Commission shall be contacted and the procedures outlined in CEQA §15064.5 (d) and (e) shall be implemented by the City or its designee.

VI ENERGY

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	□	□	□	■
b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	□	□	□	■

Setting

The California Energy Commission (Energy Commission) was charged with developing the state's Renewable Energy Program in 1998, following deregulation of electric utilities. The Energy Commission provides a brief history of its actions with regard to the Renewable Energy 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 by 2017. The California Energy Commission's (CEC's) 2003 Integrated Energy Policy Report (IEPR) recommended accelerating that goal to 2010, and the 2004 IEPR Update urged increasing the target to 33 percent by 2020. Former Governor Arnold Schwarzenegger, the CEC, and the California Public Utilities Commission (CPUC) endorsed this enhanced goal for the state as a whole. Achieving these renewable energy goals became even more important with the enactment of Assembly Bill 32 (Núñez, Chapter 488, Statutes of 2006), the California Global Warming Solutions Act of 2006. This legislation sets aggressive GHG reduction goals for the state, and its achievements will depend, in part, on the success of renewable energy programs.
>
> Senate Bill X1-2 was signed by former Governor Edmund G. Brown Jr. in April 2011 to codify the ambitious 33 percent renewable energy by 2020 goal for all California utilities, including publicly owned utilities (POUs) that had been setting their own renewable targets.
>
> In 2015, former Governor Brown extended the renewable procurement requirement by signing Senate Bill 350, which requires 50 percent renewables by 2030. In 2018, former Governor Brown signed Senate Bill 100, increasing the 2030 renewable procurement requirement to 60 percent and implementing a 100 percent zero-carbon goal for 2045. All the while, the majority of utilities and the electricity market continue to meet and exceed these goals and expectations.
>
> In the first half of 2019, California met the Million Solar Roofs goal established in Senate Bill 1 and may have met the 50 percent PV installation goal for new homes two years early.

> California has ambitious goals of reducing GHG emissions 40 percent below 1990 levels by 2030 and 80 percent by 2050, and advancing the use and availability of renewable energy is critical to achieving those goals. Therefore, the state has pursued a suite of policies and programs aimed at advancing renewable energy and helping ensure all Californians, including low-income and disadvantaged communities, benefit from this transition[9].

Today, California's energy policies are intertwined with goals of reducing greenhouse gases. The Energy Commission produces the biennial Integrated Energy Policy Report. The report contains an integrated assessment of major energy trends and issues facing California's electricity, natural gas, and transportation fuel sectors and provides policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety. The most recent report was released in 2021[10].

CURRENT ENERGY USAGE AND SOURCES

California uses the least electricity of any state with a 2020 (most recent electricity California Energy Commission date) usage of 7,069 kWh per capita[11]. The census states that Sonoma County had an estimated population of 488,863 in 2020[12] and the California Energy Commission indicates the Sonoma County used a total (residential and non-residential) of 2867.7 gigawatt hours (GWh) of electricity in 2020[13] for a per capita use of 5,866 kWh, somewhat below the state average.

Sonoma County is provided electricity by Sonoma Clean Power, a community choice aggregation, over PG&E maintained infrastructure. As of 2020, Sonoma Clean Power's power mix was ahead of California's goal and supplied 49 percent of its electricity from renewable resources under the California Renewables Portfolio Standard. Additionally, in 2020, 44 percent of Sonoma Clean Power's supply was hydroelectric, for a total of 93 percent greenhouse gas free electricity[14]. In contrast, the 2020 overall power mix in California was 33 percent renewable, 12 percent hydroelectric and nine percent nuclear, or 54 percent greenhouse gas free electricity. In 2020, total renewable electricity in California was 33 percent[15].

Analysis

a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Project construction would only account for a minor use of energy, primarily associated with fuels used in construction vehicles. All construction vehicles would be California-compliant to ensure state goals of energy efficiency and air quality are maintained.

[9] https://www.energy.ca.gov/sites/default/files/2019-12/renewable_appendix_ADA.pdf
[10] https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2021-integrated-energy-policy-report
[11] https://www.energy.ca.gov/almanac/electricity_data/us_per_capita_electricity.html
[12] https://www.census.gov/quickfacts/fact/table/sonomacountycalifornia,US/PST045218
[13] http://www.ecdms.energy.ca.gov/elecbycounty.aspx
[14] https://sonomacleanpower.org/power-sources
[15] https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2020-total-system-electric-generation

The trail would not require energy after installation. The project would implement a portion of the Creek Trail, an alternative mode of transportation and recreational facility, and would not result in a wasteful, inefficient, or unnecessary consumption of energy resources.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. As indicated previously, electricity to the project area is currently exceeding the state's renewable energy goals and the project is energy passive.

Cumulative Impacts

There are no adverse cumulative environmental impacts to energy resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to energy have been identified; therefore, no mitigation is required.

VII GEOLOGY & SOILS

RGH Consultants prepared a Geotechnical Evaluation of the project area[16]. RGH's scope of work included: reviewing selected published geologic data pertinent to the site; evaluating the subsurface conditions with borings and laboratory tests; and, analyzing the field and laboratory data. The RGH report included the following geotechnical information:

This section includes excerpts from the RGH report.

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	□	□	■	□
ii. Strong seismic ground shaking?	□	□	■	□
iii. Seismic-related ground failure, including liquefaction?	□	□	■	□
iv. Landslides?	□	□	□	■
b. Would the project result in substantial soil erosion or the loss of topsoil?	□	■	□	□
c. Would the project 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?	□	□	■	□
d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	□	□	■	□
e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	□	□	□	■

[16] *Geotechnical Study Report, Santa Rosa Creek Trail Dutton Avenue Access, Dutton Avenue. Santa Rosa, CA*. RGH Consultants. May 31, 2022.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	□	■	□	□

Environmental Setting

REGIONAL GEOLOGY AND TOPOGRAPHY

Sonoma County is located within the California Coast Range geomorphic province. This province is a geologically complex and seismically active region characterized by sub-parallel northwest-trending faults, mountain ranges and valleys. The oldest bedrock units are the Jurassic-Cretaceous Franciscan Complex and Great Valley sequence sediments originally deposited in a marine environment. Subsequently, younger rocks such as the Tertiary-age Sonoma Volcanics group, the Plio-Pleistocene-age Clear Lake Volcanics and sedimentary rocks such as the Guinda, Domengine, Petaluma, Wilson Grove, Cache, Huichica and Glen Ellen formations were deposited throughout the province. Extensive folding and thrust faulting during late Cretaceous through early Tertiary geologic time created complex geologic conditions that underlie the highly varied topography of today. In valleys, the bedrock is covered by thick alluvial soil. The site is located on the west side of Dutton Avenue within the Santa Rosa alluvial plain.

GEOLOGY

Published geologic maps indicate the property is underlain by Holocene-aged alluvial fan and terrace deposits. The alluvium consists of poorly consolidated gravel, sand, and silt.

SURFACE CONDITIONS

The proposed trail extends primarily over relatively level terrain as well as a moderately steep slope. The vegetation consists of seasonal grasses, as well as landscaping and vine rows within a portion that traverses private property. In general, the ground surface is soft and spongy. This is a condition generally associated with weak, porous surface soil. Natural drainage consists of sheet flow over the ground surface that concentrates in man-made surface drainage elements such as trail-side drainage ditches, and natural drainage elements such as swales and the nearby Santa Rosa Creek.

SUBSURFACE CONDITIONS

Borings and laboratory tests by RGH indicate that the portions of the site studied is blanketed by 3 to 6 feet of heterogeneous fill. Heterogeneous fill is a material with varying density, strength, compressibility and shrink-swell characteristics that often has an unknown origin and placement history. On the slope, this soil exhibits high plasticity and high to very high expansion potential. Adjacent to the existing creek trail, the fill exhibits high plasticity and low expansion potential. Locally, the fills within the slope contain oversized debris including metal, bricks, and concrete. The debris is prevalent enough that RGH had to terminate boring one due to oversized material that the equipment could not penetrate. The fill soils are underlain by native alluvial sand, silt, clay, and gravel mixtures that are generally loose/medium stiff directly below the fill and become stiff/dense with increasing depth. RGH did not encounter bedrock within the maximum explored (about 20½ feet).

LANDSLIDES

RGH did not observe active landslides at the site during their study. The slopes underlying the trail consist mainly of fill.

GROUNDWATER

Free groundwater was not observed in RGH's borings at the time of drilling. On hillsides, rainwater typically percolates through the porous surface materials and migrates downslope in the form of seepage at the interface of the surface materials and bedrock, and through fractures in the bedrock. Fluctuations in the seepage rates typically occur due to variations in rainfall intensity and duration, water levels in the adjacent creek, and other factors such as periodic irrigation.

LIQUEFACTION

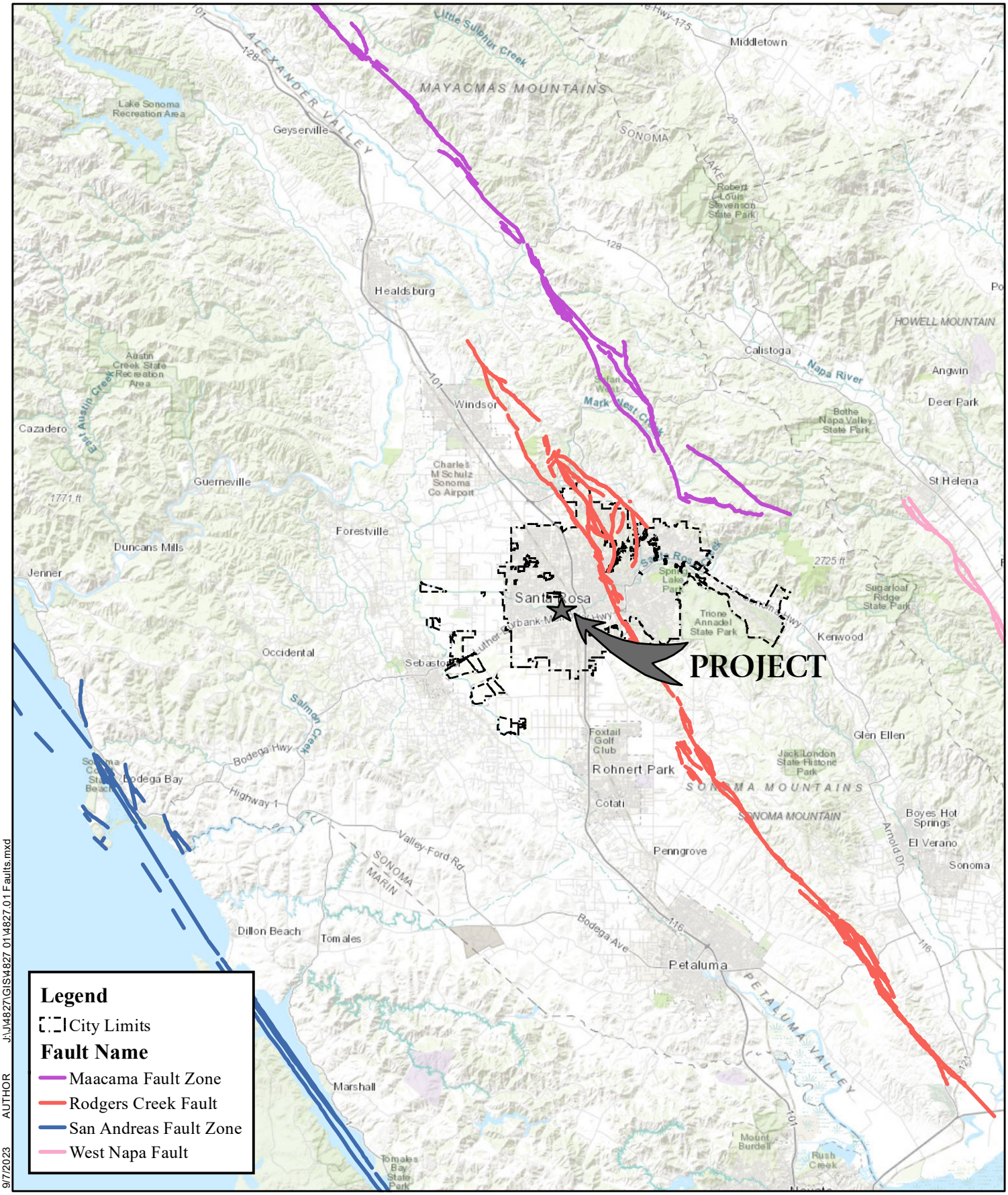
Liquefaction is a rapid loss of shear strength experienced in saturated, predominantly granular soil below the groundwater level during strong earthquake ground shaking due to an increase in pore water pressure. The occurrence of this phenomenon is dependent on many complex factors including the intensity and duration of ground shaking, particle size distribution and density of the soil. Densification is the settlement of loose, granular soil above the groundwater level due to earthquake shaking. Typically, granular soil that would be susceptible to liquefaction, if saturated, are susceptible to densification if not saturated.

SEISMIC CONDITIONS

Similar to all of Sonoma County, the project area is within a seismically active area. The nearest faults considered to be 'Holocene-active' (experiencing surface rupture within about the last 11,000 years) are shown on Figure VII-1; other faults in the project area are considered to be in the 700,000 to two million year old range and considered less likely to result in seismic activity. These faults have the potential to produce earthquakes in the project area.

CORROSION POTENTIAL

Mapping by the Natural Resources Conservation Service indicates that the corrosion potential of the near surface soil is not rated for the soils immediately along the creek and creek trail. However, corrosion potential of surrounding soils, such as along Duncan Street, is low to moderate for uncoated steel and low for concrete.



9/7/2023 AUTHOR J:\J4827\GIS\4827 01\4827_01 Faults.mxd

Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
USGS (2019)

Brelje & Race Consulting Engineers

FIGURE VII-1

FAULTS

CITY OF SANTA ROSA

SEPTEMBER 2023

Regulatory Setting

FEDERAL REGULATIONS

Clean Water Act 402 and National Pollutant Discharge Elimination System

The CWA is discussed in detail in the Hydrology and Water Quality section of this document. However, because CWA Section 402 is directly relevant to excavation, additional information is provided below. Amendments in 1987 added Section 402p to establish a framework for regulating municipal and industrial stormwater discharges under National Pollutant Discharge Elimination System (NPDES) program. The EPA has delegated to the State Water Resources Control Board (SWRCB) the authority for the NPDES program in California, which is implemented by the state's nine regional water quality control boards. Under the NPDES Phase II Rule, construction activity disturbing one acre or more must be permitted under the state's General Construction Permit. General Construction Permit applicants are required to prepare a Notice of Intent and a Stormwater Pollution Prevention Plan (SWPPP) and implement and maintain Best Management Practices (BMPs) to avoid adverse effects on receiving water quality as a result of construction activities, including earthwork.

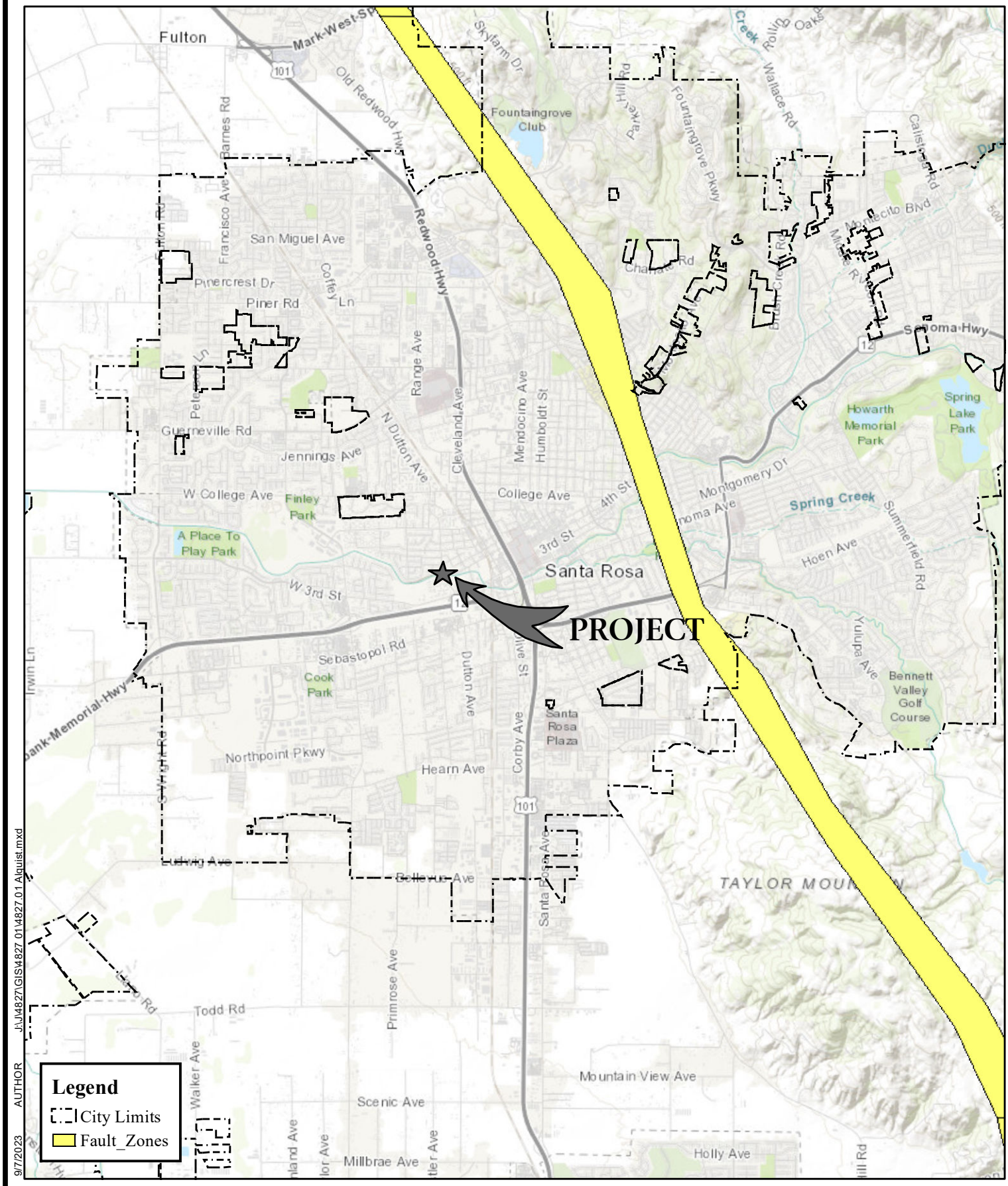
STATE REGULATIONS

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 (prior to January 1, 1994, known as the Alquist-Priolo Special Studies Zones Act – CCR, Title 14, Section 3600) sets forth the policies and criteria of the State of California in regards to building within active fault zones mapped pursuant to the Act. The Alquist-Priolo Earthquake Fault Zoning Act outlines cities' and counties' responsibilities in prohibiting the location of developments and structures for human occupancy across the trace of active faults. The policies and criteria are limited to potential hazards resulting from surface faulting or fault creep within Earthquake Fault Zones delineated on maps officially issued by the State Geologist. Figure VII-2 shows the project relative to the nearest mapped fault zone.

Seismic Hazard Mapping Act

Like the Alquist-Priolo Act, the Seismic Hazards Mapping Act of 1990 (PRC 2690 2699.6) is intended to reduce damage resulting from earthquakes. The Seismic Hazards Mapping Act addresses earthquake-related hazards, including strong ground shaking, liquefaction, and seismically induced landslides. The state is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards, and cities and counties are required to regulate development within mapped Seismic Hazard Zones. Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development. Specifically, cities and counties are prohibited from issuing development permits for sites in Seismic Hazard Zones until appropriate site-specific geologic or geotechnical investigations have been carried out, and measures to reduce potential damage have been incorporated into the development plans.



9/7/2023 AUTHOR J:\J\4827\GIS\4827 01\4827.01 Alquist.mxd

Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
Dept. of Conservation (2018)

Brelje & Race
CONSULTING ENGINEERS

FIGURE VII-2
ALQUIST PRIOLO ZONES

CITY OF SANTA ROSA
SEPTEMBER 2023

California Building Code

The California Code of Regulations, Title 24, also known as the California Building Standard Code or the California Building Code (CBC), establishes guidance for foundation design, shear wall strength, and other structurally related concerns. The CBC modified common building regulations for specific conditions found in California and included a large number of more detailed and/or more restrictive regulations. For example, CBC includes common engineering practices requiring special design and construction methods that reduce or eliminate potential expansive soil-related impacts. The CBC requires structures to be built to withstand ground shaking in areas of high earthquake hazards and the placement of strong motion instruments in larger buildings to monitor and record the response of the structure and the site of the seismic activity. Compliance with CBC regulations ensures the adequate design and construction of building foundations to resist soil movement. In addition, the CBC also contains drainage requirements in order to control surface drainage and to reduce seasonal fluctuations in soil moisture content.

Analysis

a. Would the project directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:

a.i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

The project area would not be located within an Alquist-Priolo Zone, as shown on Figure VII-2.

The project would be required to implement California Building Code Seismic Design Category Requirements into the project design for applicable features to minimize hazards associated with potential fault rupture, ground shaking, and liquefaction. Based on incorporation of appropriate geotechnical design recommendations contained in the RGH report and engineering standards, the risk to the project from fault rupture is considered to be less than significant.

a.ii. Strong seismic ground shaking?

The project location is subject to strong seismic ground shaking. As indicated in a.i.) above, the project would be designed and constructed in strict adherence with current standards for earthquake-resistant construction, as is standard practice. Risk to the project is considered to be less than significant.

The project would include a retaining wall that could be subject to impacts from strong seismic ground shaking. The RGH report includes specific seismic design recommendations that would be included in the project design of the retaining wall foundation to reduce the potential impacts to the retaining wall to less than significant.

a.iii. Seismic-related ground failure, including liquefaction?

As indicated in a.ii.) above, seismic ground shaking could occur in the project area. Because this is a pathway project (not a "structure" that would include human occupation), RGH's borings did not

extend to the depths necessary to evaluate the potential for liquefaction as the borings would need to extend below the groundwater table. RGH determined that the new pathway would have the same level of earthquake-induced risk as the existing path. The project would be designed and constructed in strict adherence with current standards for earthquake-resistant construction, as is standard practice. RGH's design recommendations would be incorporated into project design. Risk to the project is considered to be less than significant.

a.iv. Landslides?

Landslides are not evident at project location and the project would not increase the risk of landslides. Recommendations related to geotechnical conditions made by RGH would be included in the project design.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Proposed project locations would be within existing trails, sidewalks, and a graded backyard. Stormwater drainage in the area consists of man-made drainage elements such as roadside gutters draining to storm drains. Surfaces served by existing stormwater facilities would be restored to existing conditions once construction is complete to ensure there is no long-term erosion.

The State General Construction Activity Storm Water Permit (CGP) applies to construction activities that disturb one acre or more and requires the preparation and implementation of a SWPPP. The project would have a total disturbance area of approximately 6,900 SF (0.16 acres) and would not be subject to coverage under the State Water Resources Control Board (SWRCB) Construction General Permit. The project includes an erosion control plan as part of the plans and specifications to minimize the potential for erosion-related impacts to surface waters to the extent possible (Mitigation Measure GS1). Because the project would comply with current regulations and project permits to limit erosion-related water quality impacts during and after construction, any impact would be less than significant.

The project would be constructed on the north side of the existing Creek Trail and would not continue south toward the creek. As described in the Biological Resources section, project construction would occur consistent with applicable permits from the Regional Board and CDFW, if determined to be required through consultation. Permit conditions, if required, would be implemented to ensure the project does not violate any water quality standards or otherwise degrade surface or groundwater quality.

c. Would the project 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?

RGH's investigation revealed fill materials on the site. Heterogeneous fills of unknown quality and unknown method of placement, such as those found at the site, can settle and/or heave erratically under the load of new fills, structures (walls), and pavements. Wall foundations and trail surfacing supported on heterogeneous fill could also crack as a result of such erratic movements. Thus, where not removed by planned grading, the heterogeneous fill must be excavated and replaced as an engineered fill within the trail areas. Retaining wall foundations can be deepened to gain support below the fill soils provided the expansive materials immediately adjacent to the wall are removed during wall construction. All RGH's excavation, fill, paving and foundation recommendations to remediate unstable soils would be

incorporated into project design. Therefore, the risk of on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse is considered to be less than significant.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive surface soil shrinks and swells as it loses and gains moisture throughout the yearly weather cycle. Near the surface, the resulting movements can heave, and crack lightly loaded shallow foundations, walls, and pavements. The zone of significant moisture variation (active layer) is dependent on the expansion potential of the soil and the extent of the dry season. In the project area, the active layer is generally considered to range in thickness from about 2 to 3 feet. Retaining wall foundations will need to gain support below this layer. For the paved trail, detrimental effects of the above-described movements can be reduced by pre-swelling the expansive soil and covering it with a moisture fixing and confining blanket of properly compacted select fill. In order to effectively reduce slab and pavement heave given the expansion potential of the site's soil, a blanket thickness of 18 inches will be needed. Adherence to RGH's geotechnical recommendations would ensure that any risk from expansive soils is less than significant.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Wastewater service in the project area is provided by the City. The project would not impact the existing wastewater collection system.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

There are no known paleontological resources or unique geologic features in the project area. Mitigation Measure GS2 is included to preserve any such features discovered during construction and reduces any potential impact to less than significant.

Cumulative Impacts

There are no adverse cumulative environmental impacts to geology and soils resulting from implementation of the proposed project.

Mitigation Measures

GS1

The City shall prepare an erosion control plan for the project. Appropriate BMPs will be implemented by the project to minimize construction-related erosion and runoff. Suggested BMPs include, but are not limited to:

- Schedule construction activities during dry weather. Keep grading operations to a minimum during the rainy season (October 15 through April 15).
- Protect and establish vegetation.
- Stabilize construction entrances and exits to prevent tracking onto roadways.

- Protect exposed slopes from erosion through preventative measures. Cover the slopes to avoid contact with storm water by hydroseeding, applying mulch or using plastic sheeting.
- Install straw wattles and silt fences on contour to prevent concentrated flow. Straw wattles should be buried 3 to 4 inches into the soil, staked every 4 feet, and limited to use on slopes that are no steeper than 3 units horizontal to 1 unit vertical. Silt fences should be trenched 6 inches by 6 inches into the soil, staked every 6 feet, and placed 2 to 5 feet from any toe of slope.
- Designate a concrete washout area to avoid wash water from concrete tools or trucks from entering gutters, inlets or storm drains. Maintain washout area and dispose of concrete waste on a regular basis.
- Establish a vehicle storage, maintenance and refueling area to minimize the spread of oil, gas and engine fluids. Use oil pans under stationary vehicles.
- Protect drainage inlets from receiving polluted storm water through the use of filters such as fabrics, gravel bags or straw wattles.
- Check the weather forecast and be prepared for rain by having necessary materials onsite before the rainy season.
- Inspect all BMPs before and after a storm event. Maintain BMPs on a regular basis and replace as necessary.

Additionally, any erosion control measures contained in permits from the Regional Board and CDFW, if applicable, shall be incorporated into the project specifications.

GS2

The project plans and specifications shall provide that in the event paleontological site indicators are unearthed during the course of grading, excavation and/or trenching, all ground disturbing work in the vicinity of the discovery shall cease and all exposed materials shall be left in place. After cessation of excavation, the contractor shall immediately contact the City. The City shall contact a qualified professional geologist or paleontologist immediately after the find. Such consultant shall conduct an evaluation of significance of the site, and assess the necessity for mitigation. The contractor shall not resume construction activities until authorization to proceed is received from the City.

VIII GREENHOUSE GAS EMISSIONS

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	□	□	■	□
b. Would the project Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	□	□	□	■

To fully understand global climate change it is important to recognize the naturally occurring "greenhouse effect" and to define the greenhouse gases (GHG) that contribute to this phenomenon. The temperature on Earth is regulated by this "greenhouse effect," which is so named because the Earth's atmosphere acts like a greenhouse, warming the planet in much the same way that an ordinary greenhouse warms the air inside its glass walls. Like glass, the gases in the atmosphere let in light yet prevent heat from escaping.

Greenhouse gases are naturally occurring gases such as water vapor, carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O) that absorb heat radiated from the Earth's surface. Greenhouse gases are transparent to certain wavelengths of the Sun's radiant energy, allowing them to penetrate deep into the atmosphere or all the way to Earth's surface. Clouds, ice caps, and particles in the air reflect about 30 percent of this radiation, but oceans and land masses absorb the rest (70 percent of the radiation received from the Sun) before releasing it back toward space as infrared radiation. The greenhouse gases and clouds effectively prevent some of the infrared radiation from escaping; they trap the heat near the Earth's surface where it warms the lower atmosphere.

In addition to natural sources, human activities are exerting a major and growing influence on climate by changing the composition of the atmosphere and by modifying the land surface. Particularly, the increased consumption of fossil fuels (natural gas, coal, gasoline, etc.) has substantially increased atmospheric levels of greenhouse gases. Measured atmospheric levels of certain greenhouse gases such as CO_2, NH_4, and N_2O have risen substantially in recent decades. This increase in atmospheric levels of greenhouse gases unnaturally enhances the "greenhouse effect" by trapping more infrared radiation as it rebounds from the Earth's surface and thus trapping more heat near the Earth's surface.

California Implications

In 2016, CARB published the 2016 California GHG Emissions Inventory, a review and analysis of GHG emissions from 2000 to 2014. According to the report, in 2014, total California GHG emissions were 441.5 million metric tons of CO2 equivalent (MMTCO2e), a decrease of 2.8 MMTCO2e compared to 2013. This represents an overall decrease of 9.4 percent since peak levels in 2004. During the 2000 to 2014 period, per capita GHG emissions in California have continued to drop from a peak in 2001 of 13.9 tons per person to 11.4 tons per person in 2014; an 18 percent decrease[17]. State regulations have begun lowering California's

[17] https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2014/ghg_inventory_trends_00-14_20160617.pdf

GHG contribution to global GHG levels and managing GHG emissions remains an ongoing priority in California.

State Regulations

CLIMATE CHANGE REGULATORY FRAMEWORK

In September 2006, Governor Arnold Schwarzenegger signed AB 32, the California Global Warming Solutions Act, which created a comprehensive, multi-year program to reduce GHG emissions in California. AB 32 required CARB to develop a Scoping Plan, adopted in 2008, that describes the approach California will take to reduce GHGs to achieve the goal of reducing emissions to 1990 levels by 2020. The Scoping Plan recognizes that local GHG reduction commitments and climate action plans are essential to the state meeting its targeted emissions reductions. In 2016, the Legislature passed SB 32, which codified a 2030 GHG emissions reduction target of 40 percent below 1990 levels by 2030. The Scoping Plan was updated in 2017.

California's energy policies are intertwined with goals of reducing greenhouse gases. "In 2018, Senate Bill 100...set a planning target of 100 percent zero-carbon electricity resources by 2045 and increased the 2030 renewables target from 50 percent to 60 percent. On the same day of signing SB 100, then-Governor Brown signed Executive Order B-55-18 with a new statewide goal to achieve carbon neutrality (zero-net GHG emissions) by 2045 and to maintain net negative emissions thereafter. The executive order covers all sectors of the economy... Executive Order B-55-18 follows the spirit of what is required at a global scale to achieve the climate goals of the Paris Agreement, in which signatory nations worldwide agree to sufficiently reduce GHG emissions to avoid catastrophic climate change. This is also consistent with a special report by the Intergovernmental Panel on Climate Change, which found that to avoid catastrophic climate change, global carbon dioxide emissions must decline by about 45 percent below 2010 levels by 2030 and reach net zero by about 2050[18]."

LOCAL REGULATIONS

CARB works with 35 air pollution districts in California to enforce air pollution regulations, including GHGs. Many metropolitan air pollution districts, cities, and counties have adopted Local Climate Action Plans consistent with CARB Scoping Plan goals. The City adopted its Climate Action Plan in 2012 to guide development within the City consistent with its GHG reduction goals. The City subsequently adopted its Municipal Operations Climate Action Plan in 2013.

During the 2017 update to the BAAQMD's CEQA Air Quality Guidelines[19], the BAAQMD adopted applicable screening criteria contained in Table 3-1 of the Guidelines indicating categories and sizes of projects that would not exceed the 1,100 MT of CO2e/yr GHG threshold of significance for project operations. The Air Quality Guidelines also provide screening levels for projects in Table 3-1, shown below. The BAAQMD has determined that "Projects below the applicable screening criteria shown in Table 3-1 would not exceed the 1,100 MT of CO2e/yr GHG threshold of significance for projects other than permitted stationary sources."

[18] *2018 Integrated Energy Policy Report Update Volume II*. California Energy Commission. January 2019.
[19] *California Environmental Quality Act Air Quality Guidelines*. Bay Area Air Quality Management District. May 2017.

Table 3-1: Operational-Related Criteria Air Pollutant and Precursor Screening Level Sizes			
Land Use Type	**Operational Criteria Pollutant Screening Size**	**Operational GHG Screening Size**	**Construction-Related Screening Size**
City park	2613 acres (ROG)	600 acres	67 acres (PM10)

Analysis

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

Neither of the City's Climate Action Plans included thresholds of significance. While the Local Action Plan did include steps to ensure development projects were consistent, adoption of thresholds was deferred to the BAAQMD. Similarly, there are no thresholds of significance contained in the Municipal Action Plan.

The project would represent an approximate one- to two-acre park, per the BAAQMD's lowest park screening criteria in Table 3-1. As shown in the screening criteria table above, the project would be well below the magnitude that would require emissions modeling and would be considered less than significant based on the BAAQMD's screening criteria. Construction-related emissions of GHG would be minimal. Operationally, the project implements a portion of an alternative transportation route and would be beneficial to long-term GHG emissions reduction. No further analysis is required.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The City has adopted both a Climate Action Plan and a Municipal Operations Climate Action Plan. As a portion of an alternative transportation plan, the project would not result in additional GHG emissions and is consistent with both plans.

Cumulative Impacts

As indicated in a.) above, the project would result in short-term emissions of GHGs associated with project construction. Construction-related emissions are not considered to be cumulatively considerable based on the limited nature of the construction project and emissions below the BAAQMD screening criteria. The project would have a long term cumulatively beneficial impact to GHGs due to the partial implementation of an alternative transportation plan.

Mitigation Measures

No adverse environmental impacts to greenhouse gas emissions have been identified; therefore, no mitigation is required.

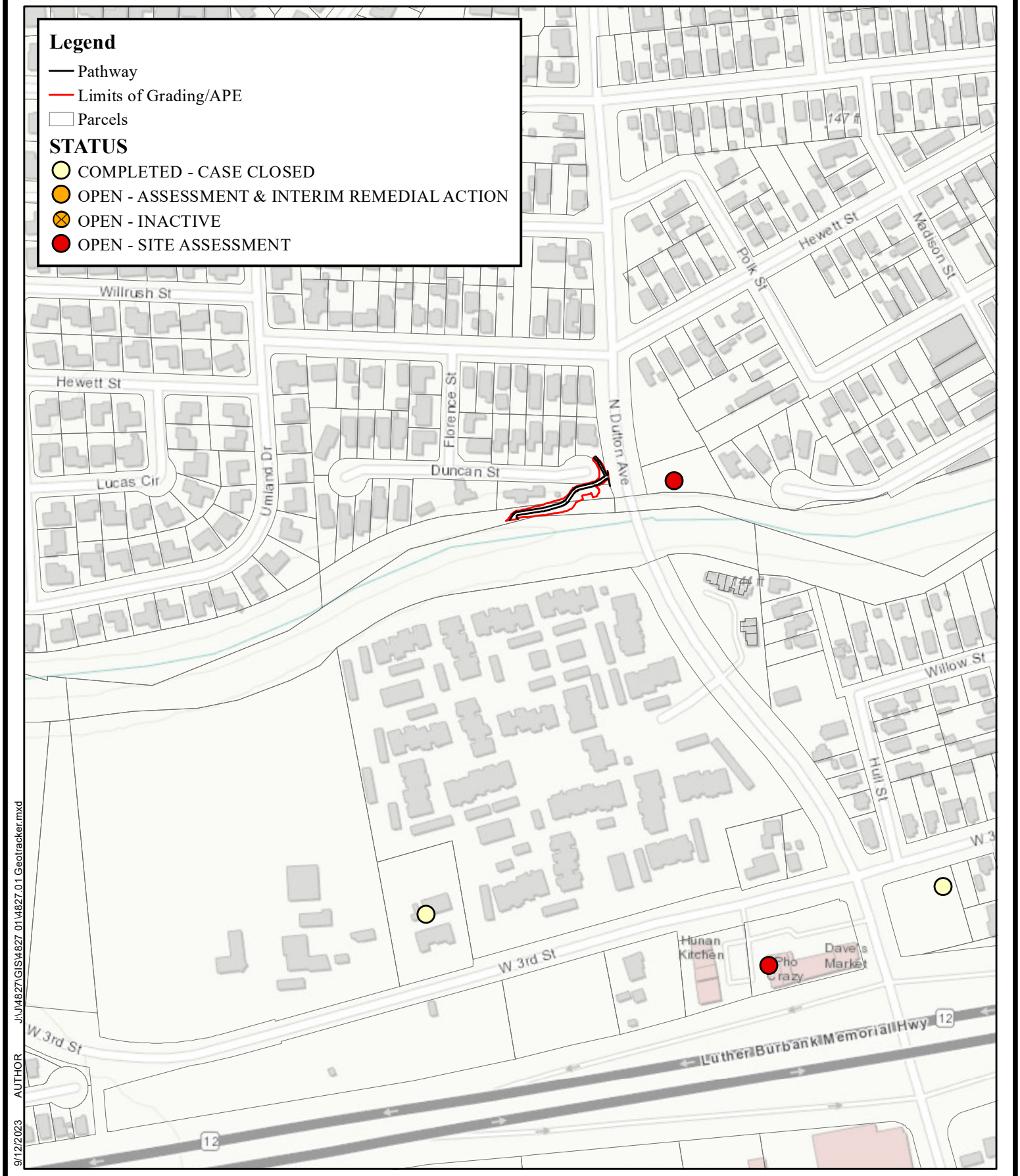
IX HAZARDS & HAZARDOUS MATERIALS

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	□	□	□	■
b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	□	■	□	□
c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	□	□	□	■
d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	□	■	□	□
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	□	□	□	■
f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	□	□	■	□
g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	□	□	□	■

Environmental Setting

There is a known hazardous materials site directly across Dutton Avenue from the project area that is designated the Hewett and Dutton Avenue (T0609793396)[20] site. This site is discussed further in the Analysis section. All sites in the project vicinity listed on California's Geotracker system are shown on Figure IX-1. Implementation of the project would require the use of small quantities of hazardous materials, including petroleum and other chemicals, to operate and maintain construction equipment.

[20] https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0609793396



Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
Flood Hazard: FEMA (2017)

NORTH

0 75 150 300 Feet

Brelje & Race
CONSULTING ENGINEERS

FIGURE IX-1
HAZARDOUS MATERIALS

CITY OF SANTA ROSA
SEPTEMBER 2023

REGULATORY SETTING

Federal Regulations

Hazardous materials in the project area are subject to applicable federal regulations, including the Resource Conservation and Recovery Act and the Comprehensive Environmental Response, Compensation, and Liability Act. Other applicable federal regulations are contained primarily in CFR Titles 29, 40, and 49.

State Regulations

California regulations are as stringent as or more stringent than federal regulations. The EPA has granted the State of California primacy oversight responsibility for administering and enforcing hazardous waste management programs. State regulations require planning and management to ensure that hazardous wastes are handled, stored, and disposed of properly to reduce risks to human and environmental health.

Analysis

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

The project would implement a portion of the Creek Trail, an alternative transportation project that is not associated with the routine transport, use or disposal of hazardous materials. Construction of the proposed project would include the use and short-term storage of hazardous materials. These materials include, but are not limited to, lubricants, adhesives, paints, asphalt, fuel, and toxic solvents. The proposed project is required to comply with federal, state, and local regulations regarding the storage, handling, disposal, and cleanup of hazardous materials. The project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

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

As indicated above, the project would not introduce new long-term hazardous materials or hazardous materials handling. There is the potential for a fuel/oil spill during construction from construction vehicles and equipment. Mitigation Measure HM1 would reduce such impact to a less than significant level. Additionally, compliance with permit terms and conditions associated with Regional Board and CDFW permits, if required, would further reduce the potential for environmental harm.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The project would not result in emissions or handling of hazardous materials within one quarter mile of an existing or proposed school. The project is a part of the Creek Trail and would not emit hazardous emissions or handle hazardous or acutely hazardous materials.

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

EBA Engineering conducted a Phase 1 Environmental Site Assessment (Phase 1)[21] to assess the possible contamination of the project site with hazardous or toxic substances or wastes. A site may contain these substances or wastes as a result of current or past site activities, unauthorized dumping or disposal, or migration of contaminants from adjacent or nearby properties. The Phase 1 was conducted in general accordance with the scope and limitations of ASTM's Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E 1527–13) and included records review, research of historical records, interviews with past and present owners and occupants, interviews with state and/or local government officials, a site reconnaissance, and an analysis of the project site's physical setting. Known sites are shown on Figure IX-1.

EBA contracted EDR to conduct a comprehensive Federal, State and local environmental records search for the project site and properties within a one-mile radius of the project site boundary. The purpose of the database search was to identify potential exposure to the subject property from various environmental concerns and/or hazardous materials releases. The Environmental Record Search (ERS) consists of a map showing the location of the identified sites relative to the project site, a summary listing the identified sites by street names, and a final report describing the sources investigated and the resulting findings. It should be noted that the findings are those noted on the regulatory database(s) and that accuracy and completeness of record information varies among information sources, including government sources.

Review of historical information sources indicates that the project site was part of a larger property in rural residential and agricultural use by at least 1942, the earliest available historical documentation. The rural residential and agricultural site use appears to have continued up through the early 1950s, before most of the large parcels in the site vicinity were split and developed into smaller residential properties. In addition, portions of the project site property appear to have been covered with a dense canopy of vegetation lining the Santa Rosa Creek riparian corridor before the creek was channelized in the 1960s. By the time of a 1973 aerial photograph, most of the trees and vegetation appear to have been removed from the project site and areas bordering the creek, and the surrounding area (excluding some of the lands to the south of Santa Rosa Creek) mostly developed with single-family residences. The project site property does not appear to have ever been developed with any buildings and has generally remained in its current use and configuration to the present day.

[21] *Phase 1 Environmental Site Assessment—Santa Rosa Creek Trail Dutton Avenue Access, Santa Rosa, California*. EBA Associates. March 10, 2022.

The project site was not listed on any of the databases searched by EDR. Further, there is no indication of the historical or current use of underground fuel storage tanks or dump sites at the project site property. However, it should be noted that a review of information on GeoTracker for the Hewett Street/North Dutton Avenue site references imported fill material reportedly brought in to shore up the banks of Santa Rosa Creek as part of flood control measures in the 1960s which was discovered to contain elevated concentrations of lead. Site-specific information regarding the fill materials that were likely brought onto portions of the project site is not available, but it can be assumed that the materials are of a similar origin. As such, the potential exists for elevated concentrations of lead to be present in the fill materials which were reportedly placed in the bank of Santa Rosa Creek which represent a potential environmental concern. It is worth noting, however, that based on a review of information for the Hewett Street/North Dutton Avenue site, the northern limits of the imported fill materials appears to be within approximately 15 feet of the northern edge of the paved bike path, and does not appear to encroach onto the portions of the project property parcel known as APN 010-495-010 (408 Duncan Street). Information related to the Hewett Street/North Dutton Avenue site is provided below.

Hewett Street/North Dutton Avenue (Inactive CPS)

This property is located across Dutton Avenue to the east of the project site and is reported to have originally been a one-acre parcel of land that exhibited elevated concentrations of lead in soil in the southern part of the site (next to Santa Rosa Creek) (ERM, 2008). The lead contamination was reported to be the result of imported fill material brought in to shore up the banks of Santa Rosa Creek as part of flood control measures in the 1960s. Petroleum hydrocarbons have not been reported in soil or groundwater samples at this site.

During pre-development assessment activities performed at the site in 1995, fill material containing assorted debris was encountered, prompting the completion of a geotechnical and environmental investigation. The results of an April 1996 initial investigation reported the presence of elevated concentrations of lead in site soils, along with other metals. Subsequent soil and groundwater investigations occurred at the site up through 2001, which reportedly assessed the extents of soil and groundwater impacts (ERM, 2008). Soil borings advanced during this time reported lead in groundwater samples at concentrations slightly above Maximum Contaminant Levels (MCLs) as defined by Title 22 of the California Code of Regulations. However, during subsequent monitoring of two monitoring wells over the course of four years, dissolved lead was not reported above laboratory reporting limits (LRLs) during any of the sample events performed and it was determined that the lead detections in grab-groundwater samples were the result of suspended particulate matter. EBA understands that during construction of the Santa Rosa Creek Trail Bike Path in 2011, 450 tons of impacted soils were excavated from the site.

A Human Health Risk Assessment (HHRA) was subsequently performed for the site in 2000 by Harding Lawson Associates (HLA, 2000). The results of the HHRA indicated that lead in soil at the site does not pose an unacceptable health risk to potential receptors for the planned land use as a bike and walking path.

In 2012 the property was reportedly split into a 0.6-acre northern and a 0.4-acre southern parcel, with lead impacts remaining within the southern parcel. There is a private residence on the northern parcel which is slated for redevelopment which has been reported to be free of impacts.

EBA understands that deed restrictions and institutional controls will be included with closure conditions for the southern parcel.

Based on the reported lack of groundwater impacts, and documentation indicating that the extent of lead impacts has been adequately characterized, conditions at this site are not seen as posing a threat of significant impact to the project site.

EBA found no recognized environmental conditions in connection with the project site property. Site-specific information regarding the fill materials that were likely brought onto portions of the project site is not available, but it can be assumed that the materials are of a similar origin to those of the Hewett Street/North Dutton Avenue site. As such, the potential exists for elevated concentrations of lead to be present in the fill materials which were reportedly placed in the bank of Santa Rosa Creek which represent a potential environmental concern.

Due to the potential for lead in the soils at the project site, EBA did composite soil sampling and lead analysis from five locations along the project alignment in July 2022. Lab results indicate that lead is present at levels generally ranging from 20.8 parts per million (ppm) to 42.1 ppm along the alignment. One sample point was detected at 115 ppm in the area of the retaining wall. The San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) has established regulatory screening levels (ESLs) for different land use and worker exposure scenarios. The ESL for construction worker exposure for lead is 160 ppm (non-cancer risk) and 2,700 ppm (cancer risk). None of the samples exceed the ESL for construction worker exposure. The majority of the soil within the alignment would be off-hauled and replaced with fill. The soil is below the threshold that would require any special disposal or construction techniques.

There is the possibility, as with any construction project, that contaminated soils may be found during construction. In that event, Mitigation Measure HM1 requires the contractor to cease work and contact the City and the Regional Board to develop a plan to dispose of the soils and to ensure worker safety and protection of the environment.

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

The nearest public use airport, Charles M. Schulz–Sonoma County Airport, is located 4.5 linear miles northwest of the project area. The project is not located within the airport's airport land use plan area. Therefore, there would be no impact.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City prepared its Local Hazard Mitigation Plan (LHMP) in October 2016 that assessed potential risks to the City[22]. The plan was updated in 2021[23] to integrate County-level coordination. The LHMP

[22] *City of Santa Rosa Local Hazard Mitigation Plan*. October 2016.
[23]https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Long%20Range%20Plans/Hazard%20Mitigation%20Plan/Adopted-Sonoma-County-MJHMP-Volume-2-December-2021.pdf

identifies the City as being at high risk to seismic events, flood, drought and wildfire. The Santa Rosa Fire Department and the Santa Rosa Police Department coordinate emergency response and evacuations based on the LHMP, nature of the emergency and coordination with the County of Sonoma, as required.

Since the LHMP was adopted, the City has experienced three catastrophic wildfire events: the October 2017 Tubbs fire; the 2019 Kincade fire; and the 2020 Glass fire. Small portions of the project would impact regular traffic flow within one lane of Dutton Avenue during reconstruction of the sidewalk intertie to the proposed trail. An efficient roadway and circulation system is vital for the evacuation of residents and the mobility of fire suppression, emergency response, and law enforcement vehicles. The City shall require that the contractor develop a traffic management plan that ensures Dutton Avenue within the project area shall be kept accessible to residents and to all first responder units, ensure appropriate traffic control and that emergency access is maintained. As such, this impact would be less than significant.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The project would implement a portion of the Creek Trail system within the City and would not increase the risk of wildland fires.

Cumulative Impacts

There are no adverse cumulative environmental impacts to or from hazards/hazardous materials resulting from implementation of the proposed project.

Mitigation Measures

HM1

The contractor shall be required to follow the provisions of § 5163 through 5167 of the General Industry Safety Orders (California Code of Regulations, Title 8) to protect the project area from being contaminated by accidental release of any hazardous materials.

In general, the Contractor shall maintain awareness of potential signs of soil and groundwater contamination throughout the project limits and shall notify the City immediately upon discovery of any potential soil or groundwater contamination.

If hazardous materials are encountered during construction or occur as a result of an accidental spill, the contractor shall halt construction immediately, notify the City, and implement remediation in accordance with the project specifications and applicable requirements of the Regional Board. Disposal of all hazardous materials shall be in compliance with current California hazardous waste disposal laws.

X HYDROLOGY & WATER QUALITY

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	□	■	□	□
b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	□	□	■	□
c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. result in a substantial erosion or siltation on- or off-site?	□	□	□	■
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	□	□	□	■
iii. 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?	□	□	□	■
iv. impede or redirect flows?	□	□	□	■
d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?	□	□	□	■
e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	□	□	□	■

Environmental Setting

SURFACE WATER

The proposed project site is located within the Russian River watershed. Santa Rosa Creek flows through the project site. The reach of Santa Rosa Creek in the project area is a constructed flood control channel with an open bottom that supports a narrow band of riparian vegetation. There are numerous streams in the project area, as shown on Figure X-1. There are no designated wild or scenic rivers in the project area.

The surrounding project area is developed with residential uses, roadways and City storm drain facilities. Stormwater in the project area is directed via the City's storm drain network and conveyed to Santa Rosa Creek.

GROUNDWATER RESOURCES

The City's water supply is primarily provided by Sonoma Water from water stored in Lake Mendocino and Lake Sonoma. The City also operates two groundwater wells to augment its supply. The proposed project does not include any new wells and does not introduce significant impervious surfaces. As shown on Figure X-2, the project is located above the Santa Rosa Plain Aquifer.

FLOODING

The portion of Santa Rosa Creek above and below the project area is a constructed flood channel. The project area is not designated as being at risk for flooding by FEMA, as shown on Figure X-3. However, FEMA has not printed flood maps for the project area. The City is in the process of conducting a flood study of Santa Rosa Creek and its tributaries and FEMA will produce flood maps for the project area in the future[24].

Regulatory Setting

Clean Water Act

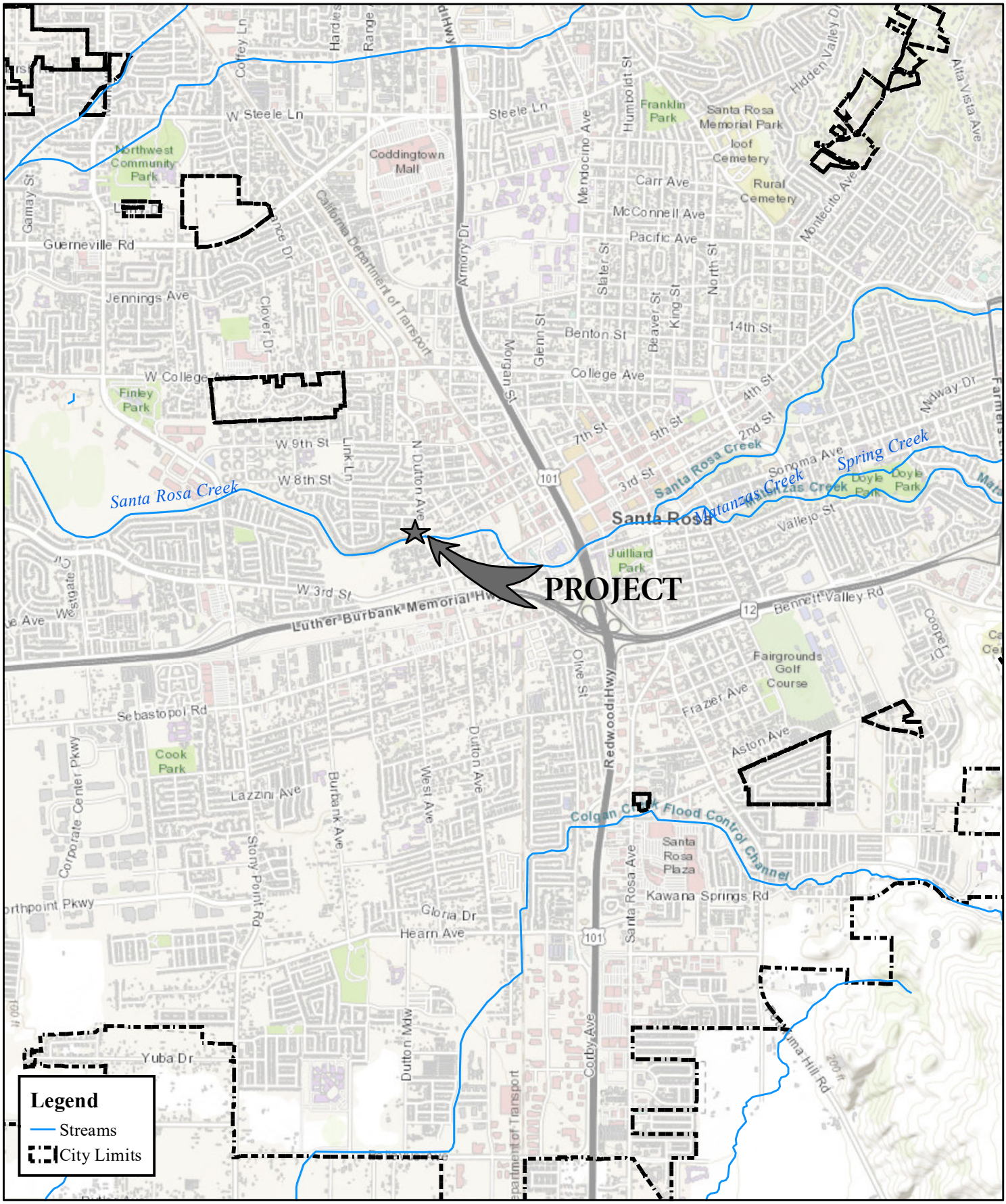
Important applicable sections of the federal CWA (33 USC 1251–1376) are identified below:

- Sections 303 and 304 provide water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the United States to obtain certification from the state that the discharge will comply with other provisions of the CWA. Certification is provided by the Regional Water Quality Control Board (RWQCB).
- Section 402 establishes the NPDES permitting system for the discharge of any pollutant (except for dredged or fill material) into waters of the United States. This permit program is administered by the RWQCB.

State Water Resources Control Board

The State Water Resources Control Board (SWRCB) is responsible for implementing the Clean Water Act and issues NPDES permits to cities and counties through regional water quality control boards. The project location is regulated by the North Coast Regional Water Quality Control Board (Regional Board).

[24] https://srcity.org/3653/Flood-Mapping



9/12/2023 AUTHOR J:\J\4827\GIS\4827 01\4827.01 Surface waters.mxd

Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
CDFW (2019)

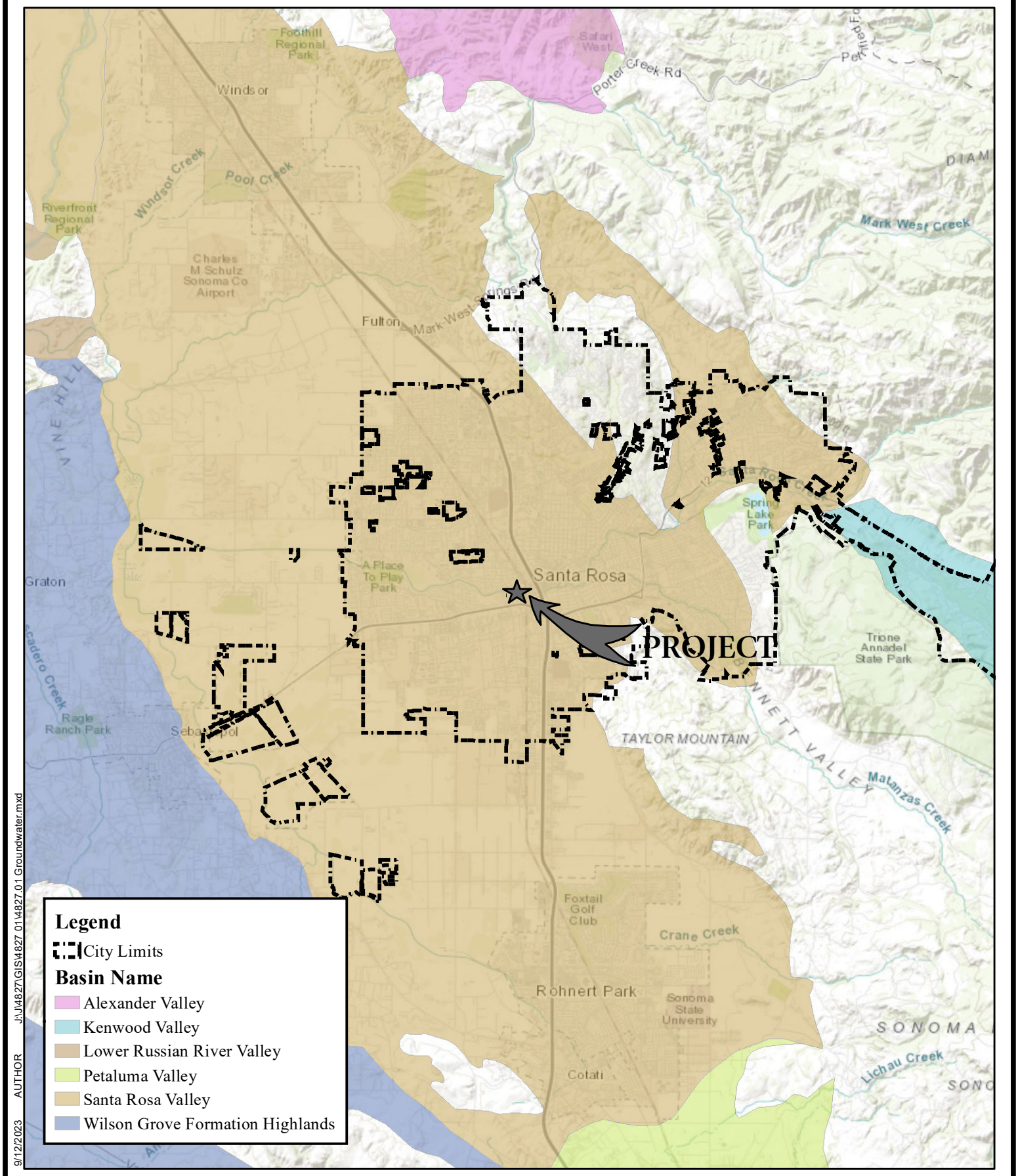
Brelje & Race
CONSULTING ENGINEERS

FIGURE X-2

SURFACE WATERS

CITY OF SANTA ROSA

SEPTEMBER 2023



Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
CalFire (2019)

NORTH

0 0.5 1 2 Miles

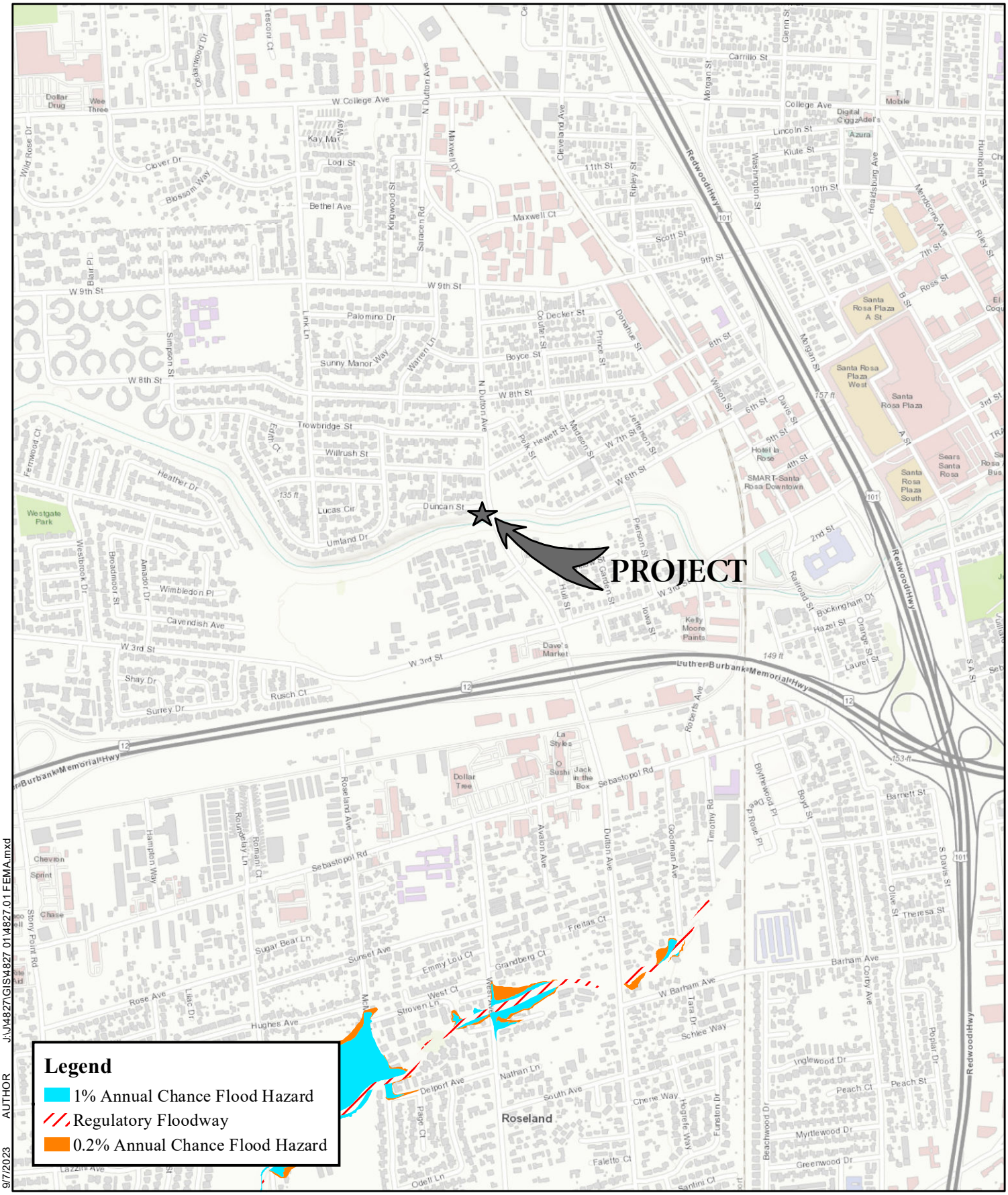
Brelje & Race

FIGURE X-2

GROUNDWATER BASINS

CITY OF SANTA ROSA

SEPTEMBER 2023



Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
Flood Hazard: FEMA (2017)

NORTH

0 260 520 1,040 Feet

Brelje & Race
CONSULTING ENGINEERS

FIGURE X-3

FEMA

CITY OF SANTA ROSA

SEPTEMBER 2023

The SWRCB has issued a statewide General Permit (Water Quality Order No. 99-08-DWQ) for construction activities within the state. The Construction General Permit (CGP) is implemented and enforced by the RWQCBs. The CGP applies to construction activity that disturbs one acre or more and requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) that identifies best management practices (BMPs) to minimize pollutants from discharging from the construction site to the maximum extent practicable.

The SWRCB has also issued a statewide General Permit (Water Quality Order No. 97-03-DWQ) for regulating stormwater discharges associated with industrial activities. This General Permit requires the implementation of management measures that will achieve the performance standard of best available technology economically achievable and best conventional pollutant control technology. It also requires the development of a SWPPP, a monitoring plan, and the filing of an annual report.

Porter-Cologne Water Quality Act

The State of California's Porter-Cologne Water Quality Control Act (California Water Code, Section 13000 et seq.) provides the basis for water quality regulation in California. This Act requires a Report of Waste Discharge for any discharge of waste (liquid, solid, or otherwise) to land or surface waters that may impair a beneficial use of surface or groundwater of the state. Based on the report, the RWQCBs issue waste discharge requirements to minimize the effect of the discharge.

Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The project would implement a portion of the Creek Trail. The project has the potential to cause construction-related violations of water quality standards. Implementation of the proposed project would involve excavation, grading, and other construction activities involving soil disturbance that may impact water quality by increasing the potential for erosion and sedimentation. Soil disturbance associated with construction activities may cause accelerated soil erosion and sedimentation and/or the release of pollutants to downstream properties and facilities that could impact water quality standards or waste discharge requirements.

The State General Construction Activity Storm Water Permit (CGP) applies to construction activities that disturb one acre or more and requires the preparation and implementation of a SWPPP. As indicated in the Geology and Soils section, the project would have a total disturbance area of approximately 6,900 SF (0.16 acre) and would not be subject to coverage under the SWRCB GCP. The project includes an erosion control plan as part of the plans and specifications to minimize the potential for erosion-related impacts to surface waters to the extent possible (Mitigation Measure GS1). Because the project would comply with current regulations and project permits to limit erosion-related water quality impacts during and after construction, any impact would be less than significant.

As described in the Biological Resources section, project construction may require permits from the Regional Board and CDFW. If required, construction would occur consistent with those permits to ensure the project does not violate any water quality standards or otherwise degrade surface or groundwater quality.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The project is not growth inducing and would not impact existing water demands or groundwater levels in the project area or elsewhere. The project does not introduce any significant new impervious surfaces (approximately 3,400 SF or 0.08 acre) and would not substantially interfere with groundwater recharge or groundwater basin management. Any impact to groundwater recharge would be less than significant.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

c.i. result in a substantial erosion or siltation on- or off-site?

The project would not substantially alter the existing area drainage. Appropriate drainage will be engineered into the project for surface water flows. No significant new impermeable surfaces would be introduced (approximately 0.08 acre associated with the pathway) and existing surfaces would be restored.

c.ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

The project would not substantially increase the rate or amount of surface runoff and would not result in flooding. The addition of approximately 0.08 acre of impermeable surface in the project area would not result in flooding. Placement of the trail within the Santa Rosa Creek flood channel similarly would not result in flooding as it is consistent with other existing portions of the trail and does not reduce flood channel capacity.

c.iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The project does not significantly alter existing grades in the project area or introduce significant new impervious surfaces that would impact local stormwater systems or result in substantial additional sources of polluted runoff. There is currently no post-construction stormwater treatment in the project area and none is proposed by the project due to its small scale and lack of significant impervious surfaces.

There is an existing drainage pathway along the north side of the existing bike path extending from the Dutton Avenue bridge to downstream of the project intersection with the existing path. It does not have defined bed, bank or channel and does not have a defined pathway across the Creek Trail to Santa Rosa Creek (it is suspected that it surface flows across the pathway during high rainfall events). A culvert would be installed underneath the terminus of the project parallel to the existing trail to allow this surface flow to continue. The swale would be included in consultation with permitting agencies.

c.iv. Would the project impede or redirect flows?

The project locations are not within a mapped 100-year flood hazard area, as shown on Figure X-3, and would not exacerbate existing conditions. As indicated above, the project is located within the Santa Rosa Creek flood control channel. While not mapped by FEMA, the location was designed to, and has historically, carried floodwaters. Over the long-term, the project would not alter the course of a stream or river or impede or redirect flows. Similar to the existing Creek Trail, the proposed project would not reduce the capacity of the channel, impede or redirect flows.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

As explained in c.iv., above, the project is not within a mapped 100-year flood hazard area but will likely experience flooding. Such flooding would not impact the project beyond it being unusable by the public during times of inundation, similar to the rest of the Creek Trail. The project area is not at risk from tsunami or in a seiche zone.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Please see a., above.

Cumulative Impacts

There are no adverse cumulative environmental impacts to hydrology/water quality resulting from implementation of the proposed project.

Mitigation Measures

Please see Mitigation Measure GS1 in the Geology and Soils section.

XI LAND USE & PLANNING

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project physically divide an established community?	□	□	□	■
b. Would the project 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?	□	□	□	■

Environmental Setting

Development in the project area is governed by the City of Santa Rosa General Plan and zoning ordinance. The project area is entirely developed according to those planning documents. Development of the access pathway is planned for in the Creek Master Plan.

Analysis

a. Would the project physically divide an established community?

The project would not physically divide an established community. The project would implement a portion of the Creek Trail, consistent with the Creek Master Plan. The trail provides alternative transportation opportunities that serve to link established communities.

b. Would the project 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?

The project would not conflict with any applicable land use plan, policy or regulation. All project components occur within public right-of-way or within public easements. The project would implement a portion of the Creek Trail in accordance with long-term planning policies.

Cumulative Impacts

There are no adverse cumulative environmental impacts to land use and planning resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to land use and planning have been identified; therefore, no mitigation is required.

XII MINERAL RESOURCES

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	□	□	□	■
b. Would the project 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?	□	□	□	■

Environmental Setting

SANTA ROSA GENERAL PLAN

No applicable general plan or specific plan indicates that there are mineral resources of value or importance in the project area.

Analysis

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

The project site does not include any known mineral resource that would be of value to the region and the residents of the state. The project would not affect the availability of any such resource.

b. Would the project 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?

The project area is not delineated in the City's General Plan or the County's Aggregate Resource Management Plan as a locally important mineral resource recovery site.

Cumulative Impacts

There are no adverse cumulative environmental impacts to mineral resources resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to mineral resources have been identified; therefore, no mitigation is required.

XIII NOISE

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	□	■	□	□
b. Would the project result in generation of excessive ground borne vibration or ground borne noise levels?	□	□	□	■
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	□	□	□	■

Environmental Setting

This section includes a description of the terminology and concepts related to noise and vibration impacts that are considered in the analysis. This section also includes a discussion of the existing environmental conditions related to noise-sensitive receptors and ambient conditions found in urban areas such as the project vicinity.

NOISE-SENSITIVE USES

Noise-sensitive land uses in the project area are nearby single family residences. There are residential uses located adjacent to the northerly and southerly portions of the project.

NOISE CONDITIONS

Existing ambient sound levels in the project area can be considered typical of an arterial roadway adjacent to a residential environment. Sources of noise in the area come primarily from traffic along Dutton Avenue. Traffic noise is highest during the daytime hours and subsides during the night.

CONSTRUCTION NOISE

The types of equipment that would be used to construct the proposed pathway include:

- One track excavator medium to large size
- One earth compactor
- One roller
- One backhoe/loader

- One wheel loader (two yard bucket)
- One water truck
- One crane truck
- One or two ten wheel dump trucks

The table below presents the typical noise levels for the construction equipment listed above based on a worst-case scenario including several pieces of the loudest equipment (running simultaneously). This includes the typical measured A-weighted Lmax noise levels (maximum noise level) that would occur at a 50-foot distance from the construction site. The acoustical use factor is the fraction of time that the equipment would typically be in use over a 1-hour period.

Equipment	Acoustical Use Factor	Typical Noise Level (Lmax)[1]
Asphalt/Concrete Truck[2]	40%	76
Backhoe	40%	78
Compactor	20%	83
Compressor	40%	78
Crane	16%	81
Dump Truck	40%	76
Excavator	40%	81
Forklift[3]	40%	75
Front-End Loader	40%	79
Jackhammer	20%	89
Paver	50%	77
Pickup Truck	40%	75
Roller	20%	80
Water Truck[2]	40%	76

Source: Federal Highway Administration 2006

1 dBA, A-weighted decibel level (measured at 50 feet)

2 Based on data for dump truck

3 Based on data for pickup truck

OPERATIONAL NOISE

During operation, the proposed project would not create noise that would be audible beyond existing background conditions associated with the use of Creek Trail.

Regulatory Setting

LOCAL REGULATIONS

City of Santa Rosa Noise Exposure Limits

The General Plan and zoning ordinance are the primary ways the City regulates noise levels and compatible uses. The City's ambient noise levels associated with zoning districts is shown below (Santa Rosa City Section Code 17-16.030). Code Section 17-16.120 states: It is unlawful for any person to operate any machinery, equipment, pump, fan, air-conditioning apparatus or similar mechanical device in any manner so as to create any noise which would cause the noise level at the property line of any property to exceed the ambient base noise level by more than five decibels. City Code Section 17-16.150 "Motor-driven vehicles-Noise" provides vehicle noise level limitations as set forth in Section 23130 of California Vehicle Code. This allows for higher noise levels for vehicles.

Zone	Time	Sound Level A (decibels) Community Environment Classification
R1 and R2	10 p.m. to 7 a.m.	45
R1 and R2	7 p.m. to 10 p.m.	50
R1 and R2	7 a.m. to 7 p.m.	55
Multi-family	10 p.m. to 7 a.m.	50
Multi-family	7 a.m. to 10 p.m.	55
Office & Commercial	10 p.m. to 7 a.m.	55
Office & Commercial	7 a.m. to 10 p.m.	60
Intensive Commercial	10 p.m. to 7 a.m.	55
Intensive Commercial	7 a.m. to 10 p.m.	65
Industrial	Anytime	70

The City does not have an ordinance or General Plan policy related to reducing construction noise.

Analysis

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

The project would not result in any long-term increases in noise levels in the project vicinity. The project would implement a portion of the Creek Trail. Noise is not typically associated with operation of the existing trail and such noise would not be exacerbated by the proposed access pathway. The proposed project would add an access point to the existing trail already in use. The project would not result in an increase in long-term ambient noise levels as it would not significantly alter existing use of the trail.

Based on typical noise levels associated with equipment used to construct pathways contained in the table presented previously, construction activities are expected to result in a temporary increase in noise levels that exceed the City's established noise criteria. Adjacent residences would be exposed to non-

attenuated construction noise. However, these impacts are temporary and construction-related. It is anticipated that the pathway would take approximately four months to construct with the noisiest periods associated with excavation and grading taking approximately three weeks spread across the four-month period. These activities would occur for approximately one week at the beginning of construction for site clearing and rough grading, for approximately one week toward the middle of construction for backfilling and for approximately one week toward the end of construction for fine grading of the pathway. Mitigation Measure N1 would reduce such temporary construction-related noise to a less than significant level.

b. Would the project result in generation of excessive ground borne vibration or ground borne noise levels?

Implementation of the project would not result in the exposure of people to or the generation of ground borne vibration or noise levels. No pile driving, blasting, or similar construction techniques that would generate such vibration are required. The access pathway and the retaining wall will require the use of excavation equipment but that equipment would not result in excessive ground borne vibration or noise levels.

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

There are no active public use airports within two miles of the project area. The project would not alter the existing noise environment resulting from air traffic.

Cumulative Impacts

There are no adverse cumulative environmental impacts to noise resulting from implementation of the proposed project.

Mitigation Measures

N1

The following measures shall be implemented at the construction site to reduce the effects of construction noise on adjacent residences:

- Noise-generating activities at the construction sites or in areas adjacent to the construction sites associated with the project in any way shall generally be restricted to the hours of 7:00 a.m. to 7:00 p.m. Any work outside of these hours shall require special permission from the City. There should be a compelling reason for permitting construction outside the designated hours.
- The City shall provide notice to all residents within 100 feet of the construction activities at least 48 hours prior to commencing construction. The notice shall include the contact information for the City's noise disturbance coordinator and the anticipated construction schedule.
- All internal combustion engine driven equipment shall be equipped with intake and exhaust mufflers which are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines shall be strictly prohibited.

- Staging of construction equipment and all stationary noise-generating construction equipment, such as air compressors and portable power generators, shall be staged as far as practical from existing noise sensitive receptors.
- "Quiet" air compressors and other "quiet" stationary noise sources shall be utilized where technology exists.
- Noise from construction workers' radios shall be controlled to the point where radio noise is not audible at existing residences bordering the project site.
- A sign providing contact information for the construction manager shall be posted onsite of construction-related questions/complaints.

XIV POPULATION & HOUSING

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project 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)?	□	□	□	■
b. Would the project displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere?	□	□	□	■

Environmental Setting

The project area is built out with residential uses within the City, according to the General Plan and zoning ordinance.

Analysis

a. Would the project 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)?

The project would implement a portion of the Creek Trail and would not induce population growth.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No housing would be displaced by the project. The project would require obtaining an easement from the yard of the existing residence at 408 Duncan Street but would not impact the residence itself.

Cumulative Impacts

There are no adverse cumulative environmental impacts to population and housing resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to population and housing have been identified; therefore, no mitigation is required.

XV PUBLIC SERVICES

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	□	□	□	■
ii. Police protection?	□	□	□	■
iii. Schools?	□	□	□	■
iv. Parks?	□	□	□	■
v. Other public facilities?	□	■	□	□

Environmental Setting

The City generally provides all of the public services in the project area. The project is located entirely within the City's Fire Department service area and police department service area. The project area is served by Santa Rosa City Schools.

Analysis

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

a.i. Fire protection?

The project would not have any negative effect on fire protection services. The project would not alter fire or emergency conditions in any meaningful way as it simply adds a pathway to the existing Creek Trail. The pathway would include a removable bollard to provide an additional access point to the trail for emergency vehicles. The contractor will be required by the City to ensure emergency access is maintained during construction.

a.ii. Police protection?

The project is not growth inducing and would not impact police protection. The project would serve as an additional access point to the existing Creek Trail and would not increase use of the trail in a way that would impact police protection.

a.iii. Schools?

The proposed project would not have a long-term impact to schools.

a.iv. Parks?

The project would not negatively impact any parks. The project would implement additional access to the existing Creek Trail.

a.v. Other public facilities?

The project would result in the temporary closure of the Creek Trail within the project extents during repaving the intersection of the existing trail and the new pathway, a temporary construction-related impact that is considered to be less than significant with the inclusion of mitigation to provide a bypass route. Please see Mitigation Measure R1 in the Recreation section of this document. The project would not impact other public facilities.

Cumulative Impacts

There are no adverse cumulative environmental impacts to public services resulting from implementation of the proposed project.

Mitigation Measures

Please see Mitigation Measure R1 in the Recreation section of this document.

XVI RECREATION

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	□	■	□	□
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	□	■	□	□

Environmental Setting

The City's Recreation and Parks Department operates parks within the City limits. The nearest formal recreation areas include DeMeo Park to the northeast of the project location and Prince Memorial Greenway just upstream along Santa Rosa Creek. The Creek Trail runs east to west along the north side of Santa Rosa Creek at the project location. In the project area, the Creek Trail is a mixed use bike and pedestrian trail. The north bank trail is paved and equipped with an access pathway on the east side of Dutton Avenue. The project would implement an access pathway to the trail on the west side of Dutton Avenue. The pathway/access road on the south side of Santa Rosa Creek is an unpaved gravel surface.

The project would be designed to be consistent with the Creek Master Plan. The project was specifically identified as "Planned Off-Street Entry" number 39 on Map 3 of the Planning Watershed Area: Santa Rosa Creek map contained in the Creek Master Plan.

Analysis

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

The project is not growth inducing and would not increase use of existing neighborhood and regional parks or other recreational facilities. The project was identified as part of the Creek Trail system in the Creek Master Plan.

Project construction would impact the Creek Trail during repaving the trail where it intersects the proposed project. The existing Creek Trail is a multi-purpose pathway that includes pedestrian and bicycle use. The north side of the Creek Trail would be closed for approximately three to four days to accommodate construction of the connection of the trail and the proposed access pathway.

A feasible bypass route exists by directing bicyclists toward West 3rd Street to Stony Point Road where it intersects Santa Rosa Creek Trial to the west. Pedestrian access may be able to be maintained during the brief closure. Mitigation Measure R1 requires the City to provide a bypass of the construction area and reduces the impact of the temporary closure to less than significant.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The project would be designed and constructed to minimize potential impacts to the environment, as described in this document. Implementation of the project, consistent with mitigation measures contained in this document, would reduce impacts to a less than significant level.

Cumulative Impacts

There are no adverse cumulative environmental impacts to recreation resulting from implementation of the proposed project.

Mitigation Measures

R1

The contractor shall develop a bicycle and pedestrian bypass plan during construction for City review and approval for the portion of the Creek Trail impacted by the construction. The plan shall include adequate signage and direction to route bicycle and pedestrian traffic around the construction area and to the detour route. Maps of the bypass route shall be posted at all Creek Trail access locations impacted by construction.

XVII TRANSPORTATION

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	□	■	□	□
b. Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	□	■	□	□
c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	□	□	□	■
d. Would the project result in inadequate emergency access?	□	■	□	□

Environmental Setting

The project is located in Santa Rosa on the west side of Dutton Avenue where it crosses Santa Rosa Creek. Dutton Avenue is a four-lane road in the project area, separated by a stripped median. Stripped on-road Class III bike lanes are provided on either side as well as sidewalks. Santa Rosa CityBus route 9 runs along Dutton Avenue in the project area.

The Creek Trail is a designated Class 1 Shared Use Path and provides an undercrossing for bikes and pedestrians under Dutton Avenue as well as a access pathway to existing bike and pedestrian facilities on the east side of Dutton Avenue. The 2018 Bicycle and Pedestrian Master Plan Update[25] proposes Class II bike lanes along Dutton Avenue in the project vicinity.

Analysis

a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The project would implement a portion of the Creek Trail, consistent with the Creek Master Plan. The project would temporarily close a portion of the Creek Trail during construction but would not have a long-term impact on an applicable transportation plan, ordinance, or policy. Because the impact would be temporary and appropriate bypasses exist for vehicular (see Mitigation Measure T1 below), pedestrian and bike traffic (Mitigation

[25] https://srcity.org/2711/Bicycle-and-Pedestrian-Master-Plan

Measure R1), the impact is considered to be less than significant with incorporation of those mitigation measures.

b. Would the project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

CEQA Guidelines § 15064.3 requires Lead Agencies to adopt thresholds of significance for vehicle miles traveled (defined as "the amount and distance of automobile travel attributable to a project"). State-wide compliance with § 15064.3 began July 1, 2020. The City has not yet adopted thresholds of significance for vehicle miles traveled.

The project would not conflict with and is not inconsistent with CEQA Guidelines § 15064.3, subdivision (b). As a planned alternative transportation project in a built-out area within the City, the project would not increase vehicle trips to or from the project area. The project is not a land use or transportation project, as specifically defined in Section 15064.3 (b) (1) and (2). Section 15064.3 (b) (3) allows for qualitative analysis: "Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate."

In this case, the project would not result in any vehicular trip per day increase due to the alternative transportation nature of the project. Therefore, a vehicle miles traveled analysis would not be required, and the project would not conflict with and is not inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

The far west lane of Dutton Avenue could be impacted by short-term construction associated with construction at the existing sidewalk. Construction could temporarily reduce access to vehicle traffic in that one lane. The project would also result in closure of the sidewalk for periods during construction. Standard traffic control mitigation provided in Mitigation Measure T1, would reduce traffic impacts and ensure traffic flow and pedestrian bypass when active construction is not underway.

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

The project would not increase design hazards. The project would be designed consistent with the Creek Master Plan.

d. Would the project result in inadequate emergency access?

The project would not have any long-term impact to emergency access. The proposed access pathway would include removable bollards to facilitate emergency access to the existing Creek Trail. Construction adjacent to Dutton Avenue could impact emergency response during construction. Mitigation Measure T2 requires the contractor to maintain emergency access and reduces such impact to less than significant.

Cumulative Impacts

There are no adverse cumulative environmental impacts to transportation resulting from implementation of the proposed project.

Mitigation Measures

T1

If it is necessary to shut down the westernmost traffic lane in Dutton Avenue during active construction, the contractor shall develop and submit an appropriate Traffic Control Plan (TCP) in accordance with the California Manual of Uniform Traffic Control Devices (MUTCD) for review and approval by the City for all project elements that impact traffic circulation. The TCP shall ensure through traffic access during periods where active construction is not taking place and ensure at least one passable lane of south bound traffic is maintained. Additionally, the TCP shall include a pedestrian bypass plan for sidewalk closures.

T2

The contractor shall provide advanced notice regarding timing, location and the duration of construction activities to local emergency responders. The contractor shall ensure emergency responders can have access through the construction area at all times. The contractor shall also ensure that all traffic lanes in Dutton Avenue are passable or can be immediately made passable in the event of evacuation.

XVIII TRIBAL CULTURAL RESOURCES

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a) 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:				
i) 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), or	□	■	□	□
ii) 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.	□	■	□	□

REGULATORY SETTING

Assembly Bill 52 (AB52), the Native American Historic Resource Protection Act, sets forth a proactive approach intended to reduce the potential for delay and conflicts between Native American and development interests. AB52 established a formal consultation process of California Native American Tribes to be conducted during the CEQA process. All projects that file a Notice of Intent to adopt a Mitigated Negative Declaration after July 1, 2016, are subject to AB52 which added tribal cultural resources (TCR) protection under CEQA. A TCR is defined as a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register, or included in a local register of historical resources. A Native American Tribe or the lead agency, supported by substantial evidence, may choose at its discretion to treat a resource as a TCR. AB52 also mandates lead agencies to consult with tribes, if requested by the tribe, and sets the principles for conducting and concluding consultation.

Analysis

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a.i. 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)?

Public Resources Code section 5020.1(k) defines "Local register of historical resources" as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution. As indicated in the Cultural Resources section, Tom Origer & Associates prepared a Cultural Resources Assessment for the project in April 2022[26] and determined there would be no impact to existing known historical resources. However, there is always the possibility of accidental discovery of historical resources during construction. In the event resources are discovered, mitigation measure CR1, contained in the Cultural Resources section, would reduce such impact to less than significant.

a.ii. 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.

No archaeological site constituents were found during Tom Origer & Associates' field survey and there are no reported ethnographic sites within one mile of the study area. No archaeological site indicators were found within the APE, including during the examination of spoils from the geotechnical borings along the proposed pathway. Application of the buried sites model indicates a moderate potential for buried archaeological resources within the APE.

AB52 requires the City to engage local Tribes to determine if there is local knowledge of Tribal Cultural Resources that are not known to other entities. As part of the AB52 tribal consultation process, project information was sent via certified mail to the following tribes by the City on March 9, 2022: Federated Indians of Graton Rancheria (FIGR), Lytton Band of Pomo Indians and Middletown Rancheria of Pomo Indians.

FIGR responded to the City's offer of Consultation on March 28, 2022, requesting formal Consultation. The City and FIRG held three virtual Consultation meetings between July 2022 and May 2023. A summary of submittals and meetings is provided below.

March 9, 2022	City AB52 offer of Consultation for project sent to FIGR
March 28, 2022	FIGR responds to AB52 notification with formal request for Consultation

[26] *Cultural Resources Study for the Santa Rosa Creek Trail—Dutton Avenue Access Project, Santa Rosa, Sonoma County, California*. Tom Origer & Associates. April 11, 2022.

July 25, 2022	City and FIGR virtual Consultation meeting, FIGR requests CEQA materials
August 4, 2022	B&R transmits Tribal Consultation materials to City including: • Dutton/SR Creek Path Cultural Report.pdf • Dutton/SR Creek Path Geotechnical Report.pdf • Dutton/SR Creek Path Phase I Environmental Site Assessment.pdf • Dutton/SR Creek Path Site Plan.pdf • DRAFT Dutton/SR Creek Trail Initial Study rev 220803.pdf • Dutton/SR Creek Path Biological Report.pdf
September 27, 2022	City provides Tribal Consultation materials to FIGR via email
September 27, 2022	FIGR acknowledges receipt of requested materials
October 18, 2022	City and FIGR hold second virtual Consultation meeting
May 30, 2023	Third virtual Consultation meeting, FIGR verbally presents comments
July 26, 2023	City forwards revised CEQA document to FIGR for review
August 17, 2023	FIGR email indicating no further comments

At the May 30, 2023, Consultation, FIGR verbally requested that the City include the following in the CEQA document:

- Include Tribal Monitoring and have an archaeologist on-call
- Include archaeological training prior to ground disturbing work
- Update the cultural resources report to include the status of the Consultation

The City has incorporated these requests into the CEQA document. On August 17, 2023, FIGR responded to the City accepting the revisions and indicating FIGR has no further comments.

FIGR has not indicated that there are known TCRs in the project area. There is always the possibility of incidental discovery of Tribal Cultural Resources during construction. FIGR has requested that Tribal Monitoring be included in the project. Mitigation contained in TCR1 would require Tribal monitoring during earth disturbing portions of project construction. Mitigation Measure TCR1 would also require preparation of an Archaeological and Tribal Cultural Resources Treatment Plan to reduce potential impacts to incidentally discovered TCRs to a level of less than significant.

Cumulative Impacts

There are no adverse cumulative environmental impacts to tribal cultural resources resulting from implementation of the proposed project.

Mitigation Measures

TCR1

Protection of Archaeological and Tribal Cultural Resources (TCR), and Construction Monitoring: The City shall ensure that an Archaeological and Tribal Cultural Resources Treatment Plan (Treatment Plan) is developed and implemented for the project's Area of Potential Effect (APE). The Treatment Plan shall be reviewed and approved by the City and Federated Indians of Graton Rancheria (FIGR) prior to the start of project construction. The Treatment Plan shall detail recommended steps for protecting, and preserving, archaeological resources and TCRs in the event they are discovered during construction. The Treatment Plan shall include Construction Monitoring and describe Protection and Preservation strategies to ensure that appropriate actions are taken to protect any archaeological resources and TCRs encountered during construction. Construction Monitoring, Protection and Preservation are described in more detail below:

- Construction Monitoring: The City shall ensure that if potential unanticipated archaeological resources or TCRs are uncovered during construction, the contractor shall halt work, and workers shall avoid altering the materials and their context. Prior to any ground disturbing construction activities, project personnel shall be trained in the identification of TCRs or prehistoric archaeological site indicators and the measures contained in the Treatment Plan by FIGR or the qualified archaeologist. Project personnel shall not collect cultural materials, examples of which are provided in the following description. Prehistoric archaeological site indicators include: obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire affected stones. Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps).

  A program of archaeological and Tribal monitoring shall be instituted for ground-disturbing activities associated with the project's APE. Monitoring shall be performed by a qualified archaeologist (Tom Origer & Associates or another mutually agreed upon qualified archaeologist) and a FIGR Tribal monitor and will consist of directly watching the excavation, grading, trenching, and other earth-moving processes. If archaeological deposits are encountered, the piece of equipment that encounters the suspected materials must be stopped, and the find inspected by the monitoring archaeologist and FIGR Tribal monitor. If the deposit contains Historic Resources, Archaeological Resources, or TCRs as defined by CEQA, all work must be stopped in the immediate vicinity. The City, archaeologist and FIGR will determine if Protection and Preservation is possible, consistent with the Treatment Plan. Work may proceed after a find has been appropriately addressed and a qualified archaeologist and FIGR Tribal representative agree that no further damage would result.
- Protection and Preservation: The preferred treatment of archaeological resources and TCRs is protection and preservation. Protection can be achieved by either avoidance (not developing within the boundaries of an archaeological resource), by covering an archaeological resource with geo-fabric and sufficient fill to protect it during and after construction, or by reducing/restricting development within the boundaries of a resource. Opportunities for Protection and Preservation of resources directly within the access pathway route are limited but shall be implemented, where feasible.

- Consultation: In the event Opportunities for Protection and Preservation are not feasible, the City and FIGR shall engage in good faith consultation and determine appropriate next steps.

XIX UTILITIES & SERVICE SYSTEMS

	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	□	□	□	■
b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	□	□	□	■
c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	□	□	□	■
d. Would the project 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?	□	□	□	■
e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	□	□	□	■

Environmental Setting

The City currently provides water and sewer service to the project area. Solid waste disposal and recycling is provided by Recology. Electricity and natural gas delivery infrastructure is owned by PG&E and electricity is generally provided by Sonoma Clean Power (some customers may opt-out and be provided by PG&E). Telephone and internet service are provided by AT&T and Comcast or Sonic, respectively.

There is an existing PG&E tower and easement on the project site, as shown on Figure 3. The project has been designed to avoid impacting the tower and project plans have been submitted to PG&E for review. It is understood by the City that the proposed project must be acceptable to PG&E.

Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The project would not require or result in the relocation or construction of new or expanded water, wastewater, storm water drainage, natural gas, or telecommunications facilities. As indicated above, a portion of the project would be located within an existing PG&E easement that contains an electrical tower. The tower would be avoided by the project and PG&E will review the proposed project to ensure it has no impact to its facilities.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The project is not growth inducing and would not increase demand for water. No new water entitlements would be required.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The project would not result in any increase in wastewater flows to the City's wastewater treatment plant.

d. Would the project 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?

No increase in solid waste generation would occur as the project would not increase solid waste demands or impair attainment of solid waste reduction goals. Any demolition materials would be processed according to state and local regulations.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The project would comply with federal, state, and local statutes and regulations related to solid waste.

Cumulative Impacts

There are no adverse cumulative environmental impacts to utilities and service systems resulting from implementation of the proposed project.

Mitigation Measures

No adverse environmental impacts to utilities and service systems have been identified; therefore, no mitigation is required.

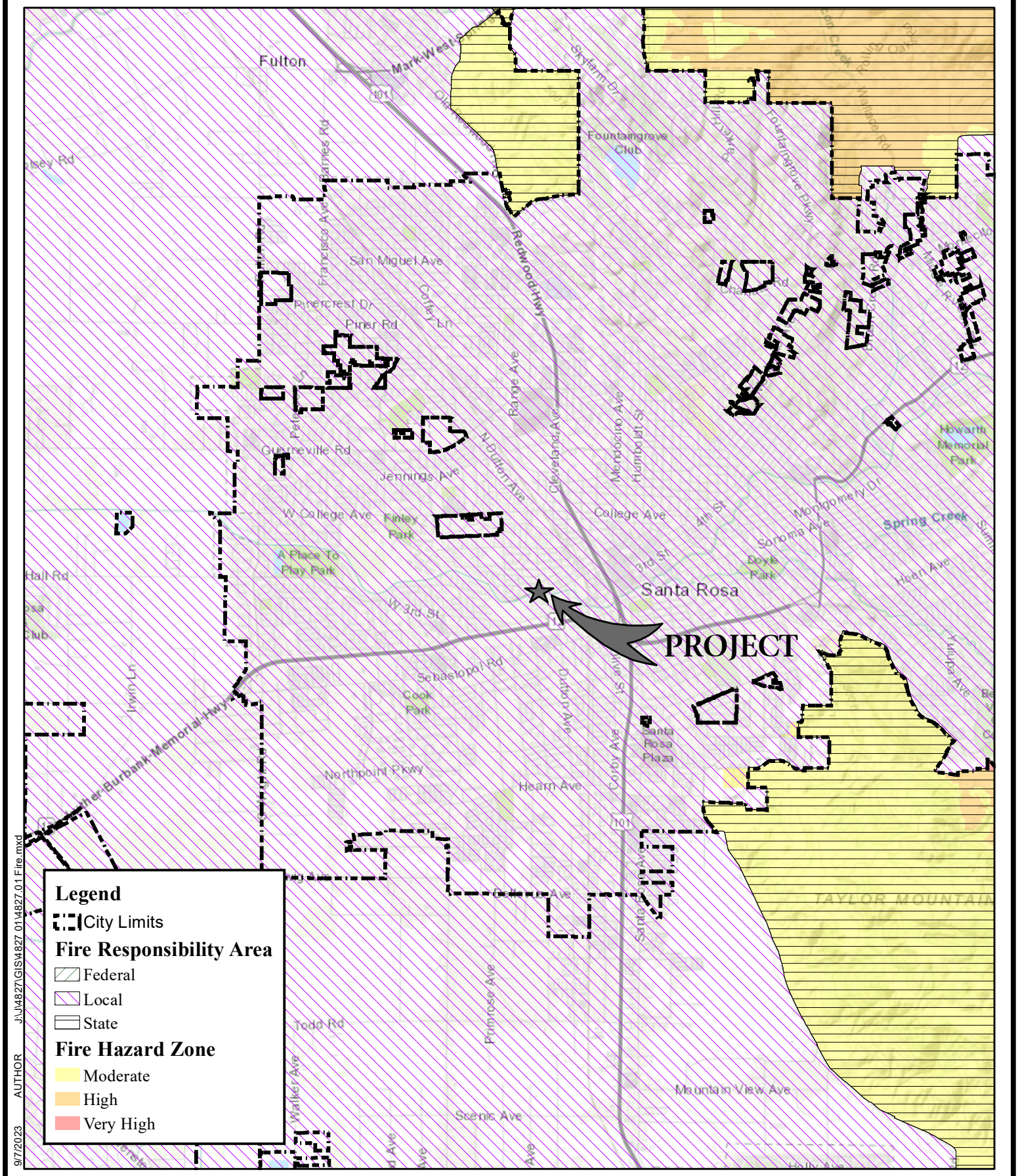
XX WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially significant impact	Less than significant impact with mitigation incorporation	Less than significant impact	No impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	□	■	□	□
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	□	□	□	■
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	□	□	□	■
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	□	□	□	■

Environmental Setting

The City's Local Hazard Mitigation Plan (LHMP), prepared in 2016 and updated in 2021, assesses potential risks to the City. The LHMP identifies the City as being at high risk to seismic events, flood, drought and wildfire. The Santa Rosa Fire Department and the Santa Rosa Police Department coordinate emergency response and evacuations based on the LHMP, nature of the emergency and coordination with the County of Sonoma, as required.

Since the LHMP was adopted, the City has experienced three catastrophic wildfire events: the October 2017 Tubbs fire; the 2019 Kincade fire; and the 2020 Glass fire. Evacuations were required during all fires. The project area is served by the Santa Rosa Fire Department and is not located within a state responsibility area, as shown on Figure XX-1. The project area is not classified as a High Fire Severity Zone.



Coordinate System: NAD 1983 StatePlane California II FIPS 0402 Feet
Projection: Lambert Conformal Conic
Datum: North American 1983
Units: Foot US

Data Source Information:
CalFire (2019)

NORTH

0 0.25 0.5 1 Miles

Brelje & Race CONSULTING ENGINEERS

FIGURE XX-1

FIRE RESPONSIBILITY AREA

CITY OF SANTA ROSA

SEPTEMBER 2023

Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The project would not have any long-term impact to emergency access. Construction in or adjacent to Dutton Avenue could impact emergency response during construction. Mitigation Measure T2, in the Transportation section, requires the contractor to maintain emergency access and reduces such impact to less than significant.

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

The project would implement a portion of the Creek Trail would not exacerbate wildfire risks. Removable bollards would be installed to facilitate emergency vehicle access to the Creek Trail.

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

The project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk.

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

The project would not alter existing risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Cumulative Impacts

There are no adverse cumulative environmental impacts from wildfire resulting from implementation of the proposed project.

Mitigation Measures

Please see Mitigation Measure TT1 contained in the Traffic section.

XXI MANDATORY FINDINGS OF SIGNIFICANCE

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

With implementation of the mitigation measures provided in this document, the project would not have a significant adverse impact on the habitat of any plant or animal species or historic or prehistoric resource. Furthermore, the project would not substantially degrade the environment or reduce the level of an endangered or otherwise important plant or animal population below self-sustaining levels. This impact would be considered less than significant with incorporation of the proposed mitigation measures contained in this document and required permits.

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

Implementation of the proposed mitigation measures would reduce impacts to less than significant levels. Because no impact is considered to be individually significant and all are construction-related, there would be no contribution to a significant cumulative effect. Therefore, this impact would be less than significant with incorporation of the proposed mitigation measures.

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

With implementation of the mitigation measures provided in this document, the project would not be expected to cause substantial adverse effects on human beings either directly or indirectly. Mitigation measures would reduce any such potential to less than significant.

DETERMINATION

On the basis of this initial evaluation:

- □ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- □ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- □ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- □ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

March 8, 2024

Date

Monet Sheikhali, Environmental Coordinator

Printed Name

For:

City of Santa Rosa

DOCUMENT PREPARATION AND SOURCES

2017 Clean Air Plan: Spare the Air, Cool the Climate. BAAQMD. April 9, 2017.

2018 Integrated Energy Policy Report Update Volume II. California Energy Commission. January 2019.

Biological Resources Report, Dutton Avenue Northwest Access Ramp to the Santa Rosa Creek Trail, Sonoma County, CA. Sol Ecology. May 2022.

California Environmental Quality Act Guidelines. 2020.

California Environmental Quality Act Air Quality Guidelines. Bay Area Air Quality Management District. May 2017.

City of Santa Rosa GIS

City of Santa Rosa Local Hazard Mitigation Plan. October 2016.

City of Santa Rosa Zoning Ordinance

Comprehensive Airport Land Use Plan for Sonoma County. 2016. Airport Land Use Commission.

Cultural Resources Study for the Santa Rosa Creek Trail—Dutton Avenue Access Project, Santa Rosa, Sonoma County, California. Tom Origer & Associates. April 11, 2022.

Fault-rupture Hazard Zones in California. Special Publication 42. Revised 1997. Department of Conservation, Division of Mines and Geology. 1983.

Geotechnical Study Report, Santa Rosa Creek Trail, Dutton Avenue Access, Dutton Avenue, Santa Rosa, CA. RGH Consultants. May 21, 2022.

Municipal Operations Climate Action Plan. City of Santa Rosa. August 6, 2013.

Paleontological Collecting. 1987. National Academy Press. Washington, DC.

Phase 1 Environmental Site Assessment—Santa Rosa Creek Trail Dutton Avenue Access, Santa Rosa, California. EBA Associates March 10, 2022.

Santa Rosa General Plan 2035. City of Santa Rosa. November 3, 2009.

Sonoma County Important Farmland—2018. California Resources Agency. Department of Conservation.

<u>Websites</u>

https://srcity.org/2711/Bicycle-and-Pedestrian-Master-Plan

http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/

https://www.energy.ca.gov/renewables/history.html

https://www.energy.ca.gov/2018_energypolicy/

https://www.energy.ca.gov/almanac/electricity_data/us_per_capita_electricity.html

http://www.ecdms.energy.ca.gov/elecbycounty.aspx

https://www.pge.com/pge_global/common/pdfs/your-account/your-bill/understand-your-bill/bill-inserts/2018/10-18_PowerContent.pdf

https://www.energy.ca.gov/2018publications/CEC-100-2018-001/Exec_Sumry_CEC-100-2018-001-V2-CMF.pdf

http://www.arb.ca.gov/desig/adm/adm.htm

https://www.arb.ca.gov/cc/inventory/pubs/reports/2000_2014/ghg_inventory_trends_00-14_20160617.pdf

http://www.airquality.org/Businesses/CEQA-Land-Use-Planning/CEQA-Guidance-Tools

Prepared by:

Justin Witt—Environmental Planner

APPENDIX D: MITIGATION MONITORING AND REPORTING PLAN

Santa Rosa Creek Trail—Dutton Avenue Access (West Side) Project
March 2024

Pursuant to Section 21081.6 of the State CEQA Guidelines[1], the mitigation measures listed in this Mitigation Monitoring and Reporting Plan (MMRP) are to be implemented as part of the proposed project. The MMRP identifies the time at which each mitigation measure is to be implemented and the person or entity responsible for implementation. The initials of the designated responsible person will indicate completion of their portion of the mitigation measure. The City of Santa Rosa Transportation and Public Works' (City) project manager's signature on the Certification of Compliance will indicate complete implementation of the MMRP.

The mitigation measures included in the MMRP are considered conditions of approval of the proposed project. The City agrees to implement the mitigation measures proposed in the MMRP. Implementation of the mitigation measures included in the MMRP is expected to avoid, minimize, rectify, reduce, or compensate potentially significant impacts to a less than significant level.

TIME OF IMPLEMENTATION

Project Design:	The mitigation measure will be incorporated into the project conditions of approval plans and specifications prior to approving the project.
Pre-construction:	The mitigation measure will be implemented prior to project construction.
Construction:	The mitigation measure will be implemented during construction.
Post-construction:	The mitigation measure will be implemented or monitored after project construction is complete.

RESPONSIBLE PERSONS AND DEPARTMENTS

The City as Lead Agency will be responsible for overall implementation of the MMRP. The City's project manager will sign off on the mitigation measures included in the MMRP. Periodically, other City staff, consultants or regulatory agencies will be involved in the implementation of specific mitigation measures. In these instances, the staff, department, or agency will be identified in the MMRP.

CERTIFICATION OF COMPLIANCE

The City will be responsible for providing signatures on the Certification of Compliance. The Certification of Compliance is a double-check to ensure that the MMRP was fully implemented.

RECORD KEEPING

The City's project manager will maintain the records of the MMRP. When the MMRP is fully implemented, the original signed copy will be maintained by the City.

1 California Code of Regulations Title 14.

CERTIFICATION OF COMPLIANCE

Complete the Certification of Compliance after mitigation measures have all been initialed. Use this Certification of Compliance to ensure the full implementation of each mitigation measure.

Project Design

The City's project manager has reviewed the project design, the plans, and the contract special provisions to verify that designated mitigation measures have been incorporated.

Signature & title Date

Pre-construction

The City's project manager has verified that designated mitigation measures were implemented prior to construction.

Signature & title Date

Construction

The City's project manager has verified that designated mitigation measures were implemented during construction.

Signature & title Date

Post-construction

The City's project manager has verified that designated mitigation measures were implemented and/or monitored after completion of construction.

Signature & title Date

AIR QUALITY

AQ1

The following Feasible Control Measures, as described by the Bay Area Air Quality Management District, shall be implemented during construction to minimize fugitive dust and emissions:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day or be covered.
- 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 or stabilized as soon as possible. Building slabs shall be poured as soon as possible after grading unless seeding or soil binders are used to stabilize the pad.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 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 visible emissions evaluator.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BBAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Implementation & Monitoring

Project Design: The City's project manager will verify that the mitigation measure is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Construction: The City's project manager shall ensure that Mitigation Measure AQ1 is being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

BIOLOGICAL RESOURCES

BIO1

Migratory Nesting Bird Surveys: For vegetation removal and construction activities that have the potential to affect nesting birds and raptors, including special status species white-tailed kite (nesting season February 1 to August 31), the following is recommended to ensure potentially significant impacts to nesting birds are reduced to a less than significant level:

- Conduct initial vegetation removal and ground disturbance from September 1 to October 14 when feasible.
- Pre-construction nesting bird surveys should be performed within the study area and within the immediate vicinity of proposed activities.
- If nests are found, a no-disturbance buffer should be placed around the nest until young have fledged or the nest is determined to be no longer active by the biologist. The size of the buffer may be determined by the biologist based on species, ambient conditions, and proximity to project-related activities.

Implementation & Monitoring

Project Design: The City's project manager will verify that the Mitigation Measure BIO1 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Pre-construction: The City's project manager shall ensure that Mitigation Measure BIO1 is implemented prior to construction.

Initials Date

BIO2
Pre-construction Bat Survey: To the extent feasible, tree removal will be performed between April 16 to August 31, outside the maternity season (maternity season is between September 1 and April 15), to avoid the period when maternity bat roosts may be present. If not possible, an acoustic emergence survey shall be performed to determine if bats are present including any solitary species. If present, the roost shall be avoided until after September 1 to ensure no significant effects to maternity bat roosts occur.

Provided no maternity roost is present, tree removal must be performed using the two-step tree removal process which includes allowing any felled trees or tree limbs to be left overnight prior to removal from the site or onsite chipping to allow any non-maternity roosting bats to exit the roost. Implementation of this measure will ensure potential effects to bat species are less than significant.

Implementation & Monitoring

Project Design: The City's project manager will verify that the Mitigation Measure BIO2 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Pre-construction: The City's project manager shall ensure that Mitigation Measure BIO2 is implemented prior to construction.

Initials Date

BIO3
The City shall consult with the Regional Board and CDFW to determine if a 401 Water Quality Certification 1602 Streambed Alteration Agreement would be required for the project. If permits are determined to be required, the City shall apply for and obtain those permits prior to construction. The City shall comply with permit terms from the Regional Board and CDFW.

Implementation & Monitoring

Project Design: The City's project manager will verify that the consultation required by Mitigation Measure BIO3 is completed during project design and any permit terms are incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Pre-construction: The City's project manager shall ensure that any permit terms generated by Mitigation Measure BIO3 are implemented prior to construction.

Initials Date

Construction: The City's project manager shall ensure that any permit terms generated by Mitigation Measure BIO3 are being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

BIO4
Worker Awareness Training: Environmental training shall be provided to all persons working on the project site prior to the initiation of project-related activities. Training will include a description of all biological resources that may be found on or near the project site, the laws and regulations that protect those resources, the consequences of non-compliance with those laws and regulations, instructions for inspecting equipment each morning prior to activities, and a contact person if protected biological resources are discovered on the project site.

Implementation & Monitoring

Project Design: The City's project manager will verify that Mitigation Measure BIO4 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Pre-construction: The City's project manager shall ensure that Mitigation Measure BIO4 is implemented prior to construction.

Initials Date

Construction: The City's project manager shall ensure that Mitigation Measure BIO4 is being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

BIO5
Erosion control materials: To protect water quality, Best Management Practices (BMPs) (e.g., silt fence, fiber rolls) must be placed to prevent construction generated spoil and debris from entering Santa Rosa Creek. All disturbed soil must be stabilized prior to a rain event and post-construction. The area should be hydroseeded with a native plant seed mix composed of species known to occur in the area. Tightly woven fiber netting or similar material shall be used for erosion control or other purposes to ensure amphibian and reptile species do not get trapped. Plastic monofilament netting (erosion control matting) rolled erosion control products, or similar non-natural material should not be used. Acceptable substitutes include coconut coir matting or tackified hydroseeding compounds.

Implementation & Monitoring

Project Design: The City's project manager will verify that the Mitigation Measure BIO5 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Construction: The City's project manager shall ensure that Mitigation Measure BIO5 is appropriately implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

Post-construction: The City's project manager shall ensure that post-construction erosion does not occur.

Initials Date

BIO6
Tree Replacement: Replacement of trees removed shall be in compliance with the City of Santa Rosa Tree Protection Ordinance. If permits are determined to be required from CDFW or the Regional Board, additional tree mitigation may be required as specified in those permits.

Implementation & Monitoring

Project Design: The City's project manager will verify that the Mitigation Measure BIO6 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Pre-construction: The City's project manager shall ensure if permits from CDFW or the Regional Board are required, they are obtained prior to construction.

Initials Date

Post-construction: The City's project manager shall ensure that post-construction tree maintenance is conducted according to the City's Tree Protection Ordinance or permit terms.

Initials Date

CULTURAL RESOURCES

CR1

The project plans and specifications shall provide that in the event prehistoric-era or historic-era archaeological site indicators are unearthed during the course of grading, excavation and/or trenching, all ground disturbing work in the vicinity of the discovery shall cease and all exposed materials shall be left in place. Prehistoric-era archaeologic site indicators could include chipped chert and obsidian tools and tool manufacture waste flakes, grinding implements such as mortars and pestles, and locally darkened soil containing the previously mentioned items as well as fire altered stone and dietary debris such as bone and shellfish fragments. Historic-era archaeologic site indicators could include items of ceramic, glass and metal, and features such as structural ruins, wells and pits containing such artifacts. After cessation of excavation, the contractor shall immediately contact the City. The City shall contact a qualified professional archaeologist immediately after the find. Such archaeologist shall conduct an evaluation of significance of the site, and assess the necessity for mitigation and contact local Native American tribes, as appropriate. The contractor shall not resume construction activities until authorization to proceed is received from the City.

Implementation & Monitoring

Project Design: The City's project manager will verify that Mitigation Measure CR1 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Construction: The City's project manager shall ensure that Mitigation Measure CR1 is being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

CR2
If human remains are encountered during grading, excavation or trenching, all construction activity shall cease and the contractor shall immediately contact the City and the Sonoma County Coroner's Office. If the remains are determined by the Coroner's Office to be of Native American origin, the Native American Heritage Commission shall be contacted and the procedures outlined in CEQA §15064.5 (d) and (e) shall be implemented by the City or its designee.

Implementation & Monitoring

Project Design: The City's project manager will verify that Mitigation Measure CR2 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Construction: The City's project manager shall ensure that Mitigation Measure CR2 is being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

GEOLOGY & SOILS

GS1

The City shall prepare an erosion control plan for the project. Appropriate BMPs will be implemented by the project to minimize construction-related erosion and runoff. Suggested BMPs include, but are not limited to:

- Schedule construction activities during dry weather. Keep grading operations to a minimum during the rainy season (October 15 through April 15).
- Protect and establish vegetation.
- Stabilize construction entrances and exits to prevent tracking onto roadways.
- Protect exposed slopes from erosion through preventative measures. Cover the slopes to avoid contact with storm water by hydroseeding, applying mulch or using plastic sheeting.
- Install straw wattles and silt fences on contour to prevent concentrated flow. Straw wattles should be buried 3 to 4 inches into the soil, staked every 4 feet, and limited to use on slopes that are no steeper than 3 units horizontal to 1 unit vertical. Silt fences should be trenched 6 inches by 6 inches into the soil, staked every 6 feet, and placed 2 to 5 feet from any toe of slope.
- Designate a concrete washout area to avoid wash water from concrete tools or trucks from entering gutters, inlets or storm drains. Maintain washout area and dispose of concrete waste on a regular basis.
- Establish a vehicle storage, maintenance and refueling area to minimize the spread of oil, gas and engine fluids. Use oil pans under stationary vehicles.
- Protect drainage inlets from receiving polluted storm water through the use of filters such as fabrics, gravel bags or straw wattles.
- Check the weather forecast and be prepared for rain by having necessary materials onsite before the rainy season.
- Inspect all BMPs before and after a storm event. Maintain BMPs on a regular basis and replace as necessary.

Additionally, erosion control measures contained in the applicable permits from the USACE, Regional Board and CDFW shall be incorporated into the project specifications.

Implementation & Monitoring

Project Design: The City's project manager will verify that erosion control measures specified in Mitigation Measure GS1 are incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Construction: The City's project manager shall ensure that erosion control measures are being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

GS2
The project plans and specifications shall provide that in the event paleontological site indicators are unearthed during the course of grading, excavation and/or trenching, all ground disturbing work in the vicinity of the discovery shall cease and all exposed materials shall be left in place. After cessation of excavation, the contractor shall immediately contact the City. The City shall contact a qualified professional geologist or paleontologist immediately after the find. Such consultant shall conduct an evaluation of significance of the site, and assess the necessity for mitigation. The contractor shall not resume construction activities until authorization to proceed is received from the City.

Implementation & Monitoring

Project Design: The City's project manager will verify Mitigation Measure GS2 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Construction: The City's project manager shall ensure that Mitigation Measure GS2 being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

HAZARDS & HAZARDOUS MATERIALS

HM1

The contractor shall be required to follow the provisions of § 5163 through 5167 of the General Industry Safety Orders (California Code of Regulations, Title 8) to protect the project area from being contaminated by accidental release of any hazardous materials.

In general, the Contractor shall maintain awareness of potential signs of soil and groundwater contamination throughout the project limits and shall notify the District immediately upon discovery of any potential soil or groundwater contamination.

If hazardous materials are encountered during construction or occur as a result of an accidental spill, the contractor shall halt construction immediately, notify the City, and implement remediation in accordance with the project specifications and applicable requirements of the Regional Board. Disposal of all hazardous materials shall be in compliance with current California hazardous waste disposal laws.

Implementation & Monitoring

Project Design: The City's project manager will verify that Mitigation Measure HM1 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Construction: The City's project manager shall ensure that that Mitigation Measure HM1 is implemented during construction, if required. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

NOISE

N1

The following measures shall be implemented at the construction site to reduce the effects of construction noise on adjacent residences:

- Noise-generating activities at the construction sites or in areas adjacent to the construction sites associated with the project in any way shall generally be restricted to the hours of 7:00 a.m. to 7:00 p.m. Any work outside of these hours shall require special permission from the City. There should be a compelling reason for permitting construction outside the designated hours.
- The City shall provide notice to all residents within 100 feet of the construction activities at least 48 hours prior to commencing construction. The notice shall include the contact information for the City's noise disturbance coordinator and the anticipated construction schedule.
- All internal combustion engine driven equipment shall be equipped with intake and exhaust mufflers which are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines shall be strictly prohibited.
- Staging of construction equipment and all stationary noise-generating construction equipment, such as air compressors and portable power generators, shall be staged as far as practical from existing noise sensitive receptors.
- "Quiet" air compressors and other "quiet" stationary noise sources shall be utilized where technology exists.
- Noise from construction workers' radios shall be controlled to the point where radio noise is not audible at existing residences bordering the project site.
- A sign providing contact information for the construction manager shall be posted onsite of construction-related questions/complaints.

Implementation & Monitoring

Project Design: The City's project manager will verify that Mitigation Measure N1 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Construction: The City's project manager shall ensure that Mitigation Measure N1 is being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

RECREATION

R1

The contractor shall develop a bicycle and pedestrian bypass plan during construction for City review and approval for the portion of the Creek Trail impacted by the construction. The plan shall include adequate signage and direction to route bicycle and pedestrian traffic around the construction area and to the detour route. Maps of the bypass route shall be posted at all Creek Trail access locations impacted by construction.

Implementation & Monitoring

Project Design: The City's project manager will verify that Mitigation Measure R1 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Pre-construction: The City's project manager shall review and approve the contractor's trail bypass pla.

Initials Date

Construction: The City's project manager shall ensure that Mitigation Measure R1 is being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

TRANSPORTATION

T1

If it is necessary to shut down the westernmost traffic lane in Dutton Avenue during active construction, the contractor shall develop and submit an appropriate Traffic Control Plan (TCP) in accordance with the California Manual of Uniform Traffic Control Devices (MUTCD) for review and approval by the City for all project elements that impact traffic circulation. The TCP shall ensure through traffic access during periods where active construction is not taking place and ensure at least one passable lane of south bound traffic is maintained. Additionally, the TCP shall include a pedestrian bypass plan for sidewalk closures.

Implementation & Monitoring

Project Design: The City's project manager will verify that Mitigation Measure T1 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Pre-construction: The City's project manager shall review and approve the contractor's traffic management plan.

Initials Date

Construction: The City's project manager shall ensure that Mitigation Measure T1 is being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

T2

The contractor shall provide advanced notice regarding timing, location and the duration of construction activities to local emergency responders. The contractor shall ensure emergency responders can have access through the construction area at all times. The contractor shall also ensure that all traffic lanes in Dutton Avenue are passable or can be immediately made passable in the event of evacuation.

Implementation & Monitoring

Project Design: The City's project manager will verify that Mitigation Measure T2 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Construction: The City's project manager shall ensure that Mitigation Measure T2 is being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date

TRIBAL CULTURAL RESOURCES

TCR1

Protection of Archaeological and Tribal Cultural Resources (TCR), and Construction Monitoring: The City shall ensure that an Archaeological and Tribal Cultural Resources Treatment Plan (Treatment Plan) is developed and implemented for the project's Area of Potential Effect (APE). The Treatment Plan shall be reviewed and approved by the City and Federated Indians of Graton Rancheria (FIGR) prior to the start of project construction. The Treatment Plan shall detail recommended steps for protecting, and preserving, archaeological resources and TCRs in the event they are discovered during construction. The Treatment Plan shall include Construction Monitoring and describe Protection and Preservation strategies to ensure that appropriate actions are taken to protect any archaeological resources and TCRs encountered during construction. Construction Monitoring, Protection and Preservation are described in more detail below:

- Construction Monitoring: The City shall ensure that if potential unanticipated archaeological resources or TCRs are uncovered during construction, the contractor shall halt work, and workers shall avoid altering the materials and their context. Prior to any ground disturbing construction activities, project personnel shall be trained in the identification of TCRs or prehistoric archaeological site indicators and the measures contained in the Treatment Plan by FIGR or the qualified archaeologist. Project personnel shall not collect cultural materials, examples of which are provided in the following description. Prehistoric archaeological site indicators include: obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire affected stones. Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps).

  A program of archaeological and Tribal monitoring shall be instituted for ground-disturbing activities associated with the project's APE. Monitoring shall be performed by a qualified archaeologist (Tom Origer & Associates or another mutually agreed upon qualified archaeologist) and a FIGR Tribal monitor and will consist of directly watching the excavation, grading, trenching, and other earth-moving processes. If archaeological deposits are encountered, the piece of equipment that encounters the suspected materials must be stopped, and the find inspected by the monitoring archaeologist and FIGR Tribal monitor. If the deposit contains Historic Resources, Archaeological Resources, or TCRs as defined by CEQA, all work must be stopped in the immediate vicinity. The City, archaeologist and FIGR will determine if Protection and Preservation is possible, consistent with the Treatment Plan. Work may proceed after a find has been appropriately addressed and a qualified archaeologist and FIGR Tribal representative agree that no further damage would result.
- Protection and Preservation: The preferred treatment of archaeological resources and TCRs is protection and preservation. Protection can be achieved by either avoidance (not developing within the boundaries of an archaeological resource), by covering an archaeological resource with geo-fabric and sufficient fill to protect it during and after construction, or by reducing/restricting development within the boundaries of a resource. Opportunities for Protection and Preservation of resources directly within the access pathway route are limited but shall be implemented, where feasible.
- Consultation: In the event Opportunities for Protection and Preservation are not feasible, the City and FIGR shall engage in good faith consultation and determine appropriate next steps.

Implementation & Monitoring

Project Design: The City's project manager will verify that Mitigation Measure TCR1 is incorporated into the project plans and specifications prior to issuing final project approvals.

Initials Date

Pre-construction: The City's project manager shall ensure that an Archaeological and Tribal Cultural Resources Treatment Plan has been prepared and approved by FIGR prior to construction.

Initials Date

Construction: The City's project manager shall ensure that Mitigation Measure TCR1 and the Archaeological and Tribal Cultural Resources Treatment Plan are being implemented during construction. Failure to comply shall result in issuance of a stop work order until corrective action has been taken.

Initials Date