

Santa Rosa Downtown Station Area Specific Plan Update: Initial Study

December 19, 2019



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Project Description

INTRODUCTION

This Initial Study evaluates the potential environmental impacts of implementing an update to the Santa Rosa Downtown Station Area Specific Plan (DSASP), originally adopted in 2007. A prior Environmental Impact Report (EIR) for the 2007 DSASP was certified in October 2007 (SCH #2006072104). That EIR described and disclosed the environmental effects associated with adoption by the Santa Rosa City Council of a specific plan to guide redevelopment in a 650-acre area in the center of the city that includes Courthouse Square, Railroad Square and surrounding residential neighborhoods. As evaluated in the 2007 EIR, the 2007 DSASP involved changes to land use and zoning regulations intended to foster a vibrant mix of housing, shopping, and jobs in proximity to transit, as well as a range of circulation and infrastructure improvements needed to support the densification and intensification of uses downtown.

The primary purpose of this evaluation is to determine, pursuant to Public Resources Code sections 21090 and 2166 and California Environmental Quality Act (CEQA) Guidelines Sections 15162, 15163, and 15081 whether a Subsequent EIR is needed to fully assess and evaluate the currently proposed update to the 2007 DSAP. CEQA provides that when an EIR has been certified, no Subsequent or Subsequent EIR shall be required unless the City determines, on the basis of substantial evidence, one or more of the following conditions are met:

1. Substantial changes are proposed as part of the proposed update that would result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes have occurred with respect to circumstances under which the proposed update is undertaken (i.e., a significant change in the existing or future condition) that would result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects; and/or
3. New information of substantial importance indicates that the proposed update result in a new significant environmental effect or a substantial increase in the severity of previously identified significant effects.

Pursuant to Section 15367 of the CEQA Guidelines, the City of Santa Rosa will be the Lead Agency for purposes of environmental review.

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PROJECT LOCATION

Santa Rosa is located in central Sonoma County, about 55 miles north of San Francisco. The planning area covers approximately 720 acres surrounding the Downtown Station SMART site in the heart of Santa Rosa. The 2007 DSASP was roughly bounded by College Avenue to the north, Sebastopol Road to the south, Santa Rosa Avenue and E Street to the east, and North Dutton Avenue to the west. These boundaries were chosen to be generally consistent with the downtown area specified in the Santa Rosa 2020 General Plan with the exception of a small portion east of E Street.

As part of the DSASP Update, the eastern boundary has been expanded to Brookwood Avenue to be consistent with the General Plan's definition of the downtown core. See Figure 1 for planning area boundaries and regional location.

BACKGROUND AND PRIOR ENVIRONMENTAL ANALYSIS

Existing Conditions

The planning area is a largely urbanized area defined by a walkable street grid, a mix of daytime and nighttime uses, varying levels of development intensities, and excellent access to the regional transportation network. The planning area encompasses several established neighborhoods, including Courthouse Square, Railroad Square, Maxwell Court, South A Street Arts District (SOFA), and several established residential neighborhoods, including many that are designated historic preservation districts. In addition, the entire planning area is classified as a Priority Development Area (PDA), an area that has been identified by Bay Area communities as areas for investment, new homes and job growth.


The structure of the planning area is defined largely by the transportation infrastructure and the creeks (Santa Rosa and Matanzas) that run through it. US 101 bisects the area in a north-south direction, separating the two principal downtown commercial districts, the central business district around Courthouse Square to the east and the historic commercial core around Railroad Square to the west. The railway tracks further divide the planning area in a north-south direction, generally flanked by industrial development that separates residential areas on either side from one another. Highway 12 generally forms the southern boundary of the planning area, although an elevated segment of this roadway separates development on Sebastopol Road from the rest the planning area, with connections via underpasses at Dutton, Olive Street, and the railway tracks.


2007 DSASP

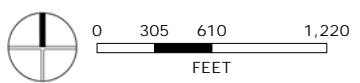
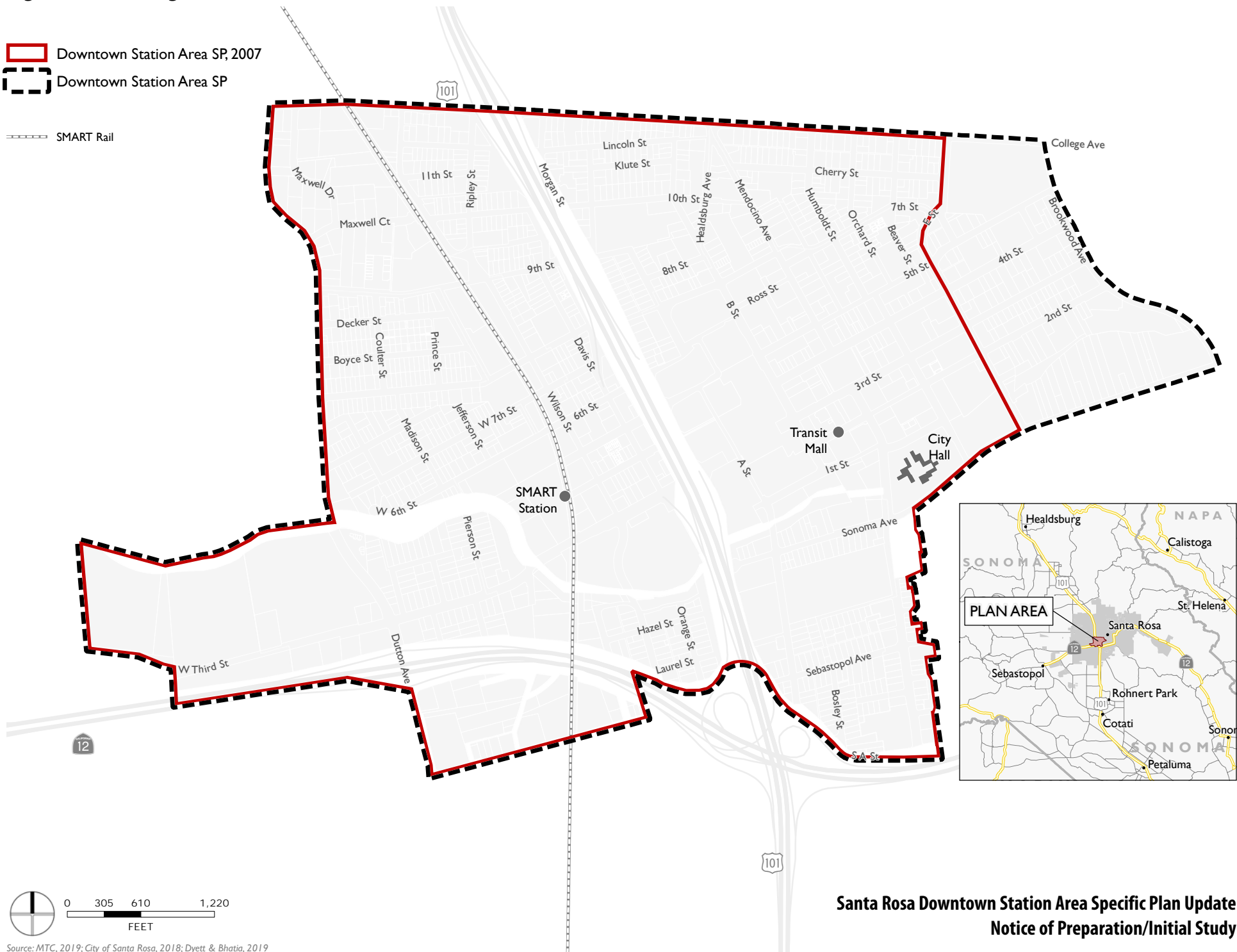
The 2007 DSASP describes a vision for downtown as an energetic commercial and cultural center with a range of housing, employment, retail and restaurant options in a vibrant, walkable environment. The 2007 DSASP aims to enhance distinct identity and character, encourage a diverse mix of uses, incorporate transit-oriented development, and create additional pedestrian-friendly connections through a range of supportive policies and standards. To implement this vision, the 2007 DSASP generally maintained the General Plan land use designations applicable in the

Figure 1: Planning Area

 Downtown Station Area SP, 2007

 Downtown Station Area SP

 SMART Rail



Source: MTC, 2019; City of Santa Rosa, 2018; Dyett & Bhatia, 2019

Planning area but added a new Transit Village land use category with two classifications: Transit Village Medium and Transit Village Mixed Use. 2007 DSASP land use designations are shown in Figure 2. The 2007 DSASP also identified the following seven Sub-Areas downtown, specifying allowable building heights for each: Courthouse Square, Railroad Square, Railroad Corridor, Park and Gardens, Imwalle Gardens, Residential, and Historic Residential Sub-Areas. These Sub-Areas and associated heights are shown in Table 1, below.

Table 1. Allowable Building Heights by Sub-Area

<i>Sub-Area</i>	<i>Allowable Building Height</i>
Courthouse Square	2-10 stories
Railroad Square	2-7 stories
Railroad Corridor	1-5 stories
Park and Gardens	2-3 stories
Imwalle Gardens	1-4 stories
Residential	1-5 stories
Historic Residential	1-3 stories

Source: 2007 DSASP

The 2007 Plan created six Street Types for key travel routes for all modes of transportation and three Corridor Types for key pedestrian and bicycle routes. Each of the Sub-Areas and key streets and corridors are shown on Figure 3. Separate design guidelines and streetscape standards were established for each Street and Corridor Type which:

- Designate areas where new development must provide activity-generating uses at the ground floor along all public streets;
- Define the intended character, form and function of the street or corridor;
- Establish the basic parameters governing building form for new construction or substantial renovation; and
- Include additional requirements or guidelines for specific private or public building locations.

The DSASP also includes multiple circulation improvements to address the impact created by the new development on the local and regional roadway, bicycle and pedestrian systems. Major improvements include:

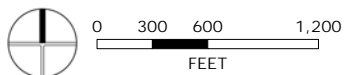
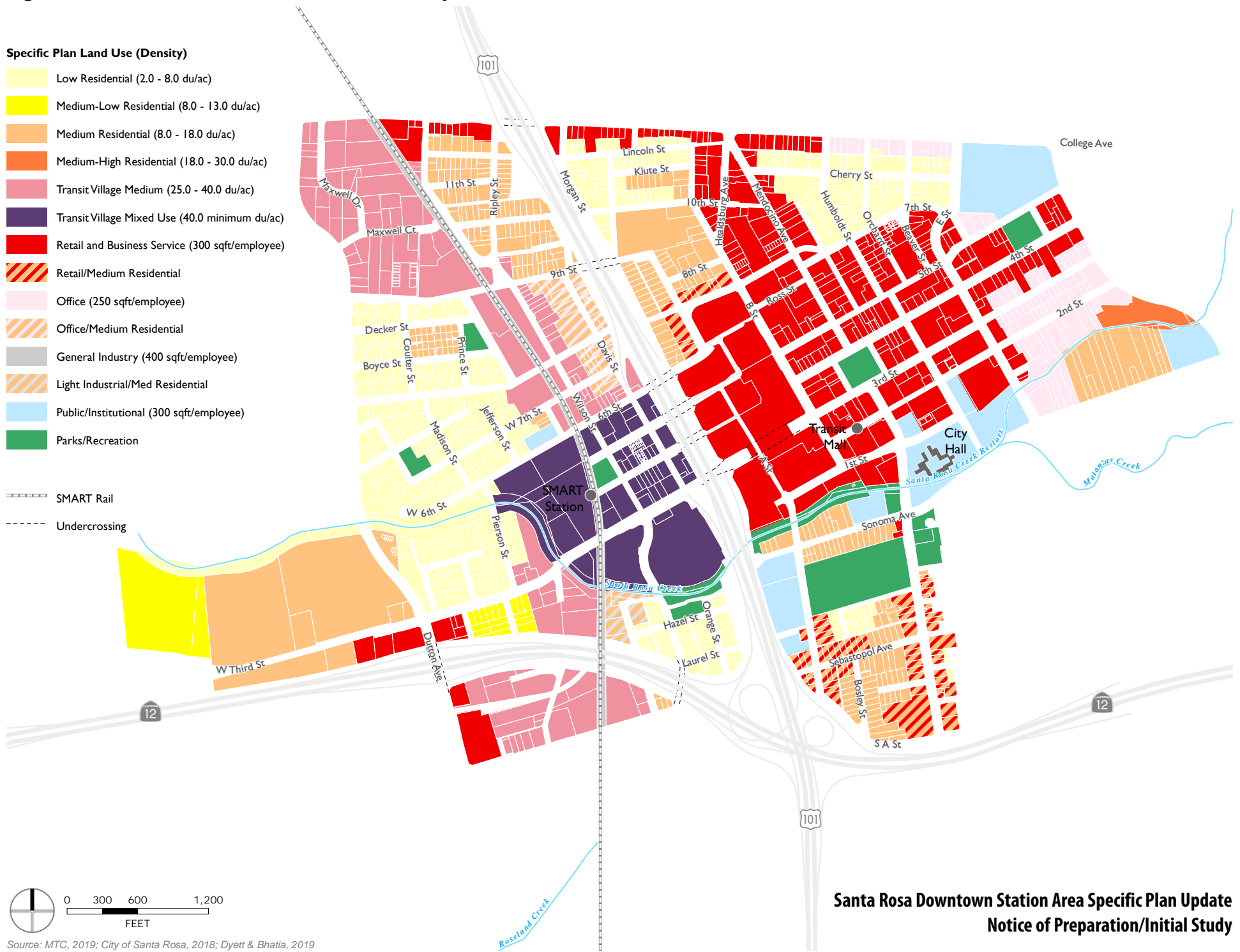
- Reunification of Courthouse Square;
- Improvements at various intersections to address rerouted traffic due to reunification;
- New streets at Roberts Avenue, Donahue Street, West Sixth Street, the SMART Station; and at 4th Street through the Santa Rosa Plaza Mall; and
- Reclassification of Mendocino Avenue, Sixth and Seventh streets to a 2-lane transitional/collector street; B Street to a 3-lane transitional/collector street; Healdsburg Avenue to a 3-lane regional/arterial street; and First Street to a 2-lane regional arterial street

Figure 2: Santa Rosa Downtown Station Area Specific Plan 2007 Land Use

Specific Plan Land Use (Density)

- Low Residential (2.0 - 8.0 du/ac)
- Medium-Low Residential (8.0 - 13.0 du/ac)
- Medium Residential (8.0 - 18.0 du/ac)
- Medium-High Residential (18.0 - 30.0 du/ac)
- Transit Village Medium (25.0 - 40.0 du/ac)
- Transit Village Mixed Use (40.0 minimum du/ac)
- Retail and Business Service (300 sqft/employee)
- Retail/Medium Residential
- Office (250 sqft/employee)
- Office/Medium Residential
- General Industry (400 sqft/employee)
- Light Industrial/Med Residential
- Public/Institutional (300 sqft/employee)
- Parks/Recreation

- SMART Rail
- Undercrossing



Source: MTC, 2019; City of Santa Rosa, 2018; Dyett & Bhatia, 2019

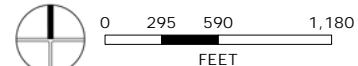
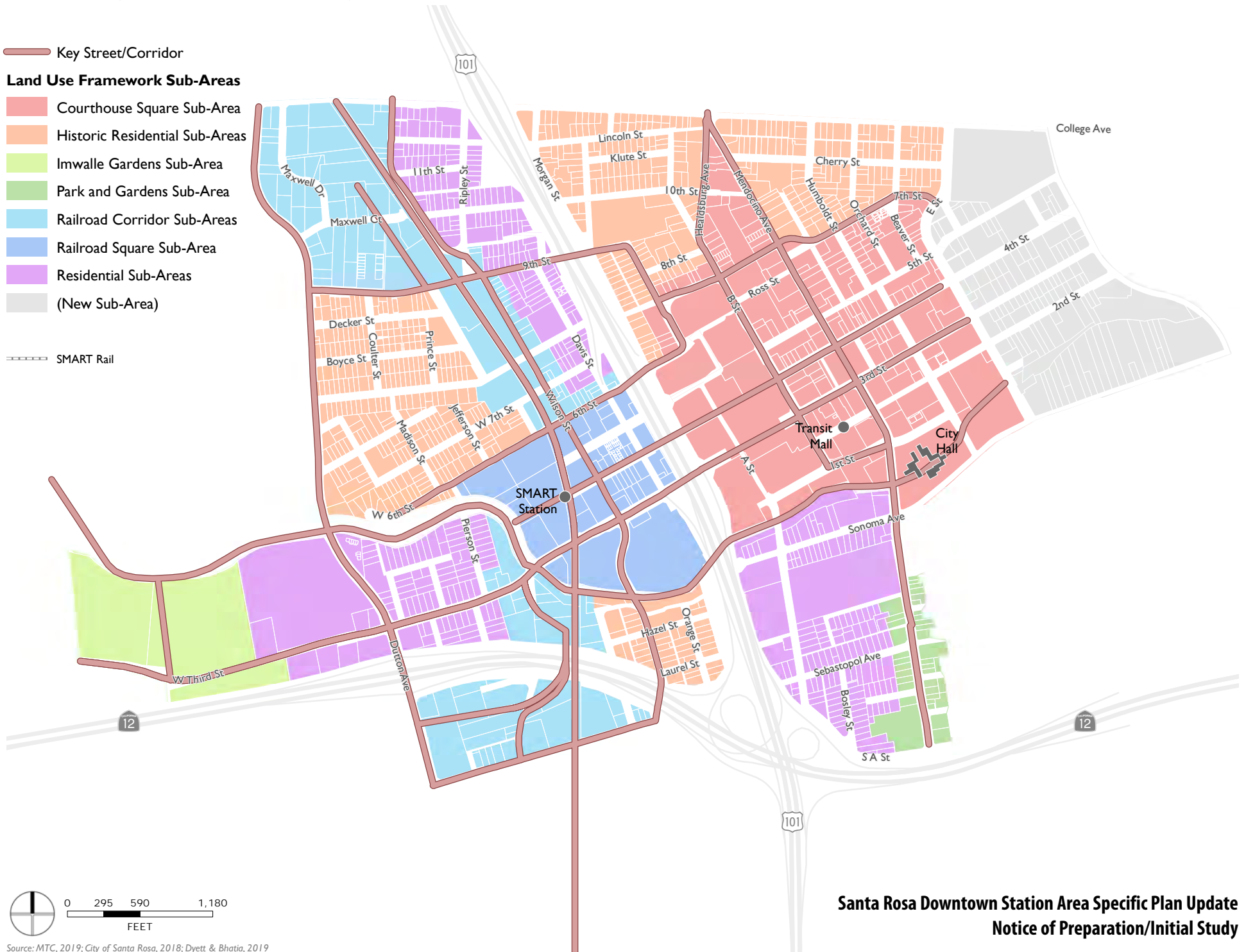
Figure 3: Key Streets and Corridors by Sub-Areas

— Key Street/Corridor

Land Use Framework Sub-Areas

- Courthouse Square Sub-Area
- Historic Residential Sub-Areas
- Imwalle Gardens Sub-Area
- Park and Gardens Sub-Area
- Railroad Corridor Sub-Areas
- Railroad Square Sub-Area
- Residential Sub-Areas
- (New Sub-Area)

— SMART Rail



Source: MTC, 2019; City of Santa Rosa, 2018; Dyett & Bhatia, 2019

Prior Environmental Review

The DSASP EIR was certified on October 9, 2007 and addressed the following environmental impact topics:

- Aesthetics
- Air Quality
- Biological Resources
- Geology and Soils (including Mineral Resources)
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use (includes Agricultural Resources)
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation and Circulation
- Utilities and Infrastructure

The 2007 EIR found significant and unavoidable impacts related to air quality and transportation and circulation. Additionally, the 2007 EIR identified the following significant impacts and included mitigation measures that would reduce those impacts to a less than significant level:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils (includes Mineral Resources)
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise
- Traffic and Circulation

A full list of significant impacts and mitigation measures from the 2007 DSASP is included in an appendix to this Initial Study.

PROPOSED PLAN

A key purpose of the 2007 DSASP is to increase the number of residents and employees within walking distance of the Sonoma Marin Area Rail Transit (SMART) site through the intensification of land uses in the planning area. However, halfway through the planning period, only 100 out of an envisioned 3,400 housing units and 194,000 of an envisioned 494,000 square feet of office, retail, and institutional uses have been developed, with an additional 275 housing units and 107,000 square feet of office, retail, and institutional uses approved, but not yet constructed. Successful downtown development is an essential part of addressing the urgent housing need created by the housing crisis and loss of homes to the 2017 wildfires. As such, the City of Santa Rosa is undertaking an update to the 2007 DSASP to explore options for addressing the community's

unmet housing needs as well as land use, transportation, economic development, and historic preservation issues associated with the intensification of housing development downtown.

Project Objectives

The proposed Santa Rosa Downtown Station Area Specific Plan Update (Proposed Plan) includes the following objectives:

- Enhance the role of Downtown Santa Rosa as an energetic commercial and cultural center with a range of housing, employment, retail and restaurant options in a vibrant, walkable environment;
- Facilitate the production of housing that provides a range of options for people of all incomes, abilities, and stages of life;
- Enhance connectivity for pedestrians, cyclists, and transit users within in the planning area and to/from key destinations;
- Increase the number of residents and employees within one half mile of high frequency transit options;
- Strengthen sense of place by providing welcoming civic spaces, public art, and uses and design that promote day and nighttime vitality;
- Leverage City-owned properties in the planning area to catalyze redevelopment that can provide for the community's unmet housing needs within the planning area.

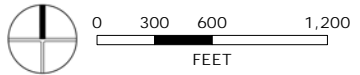
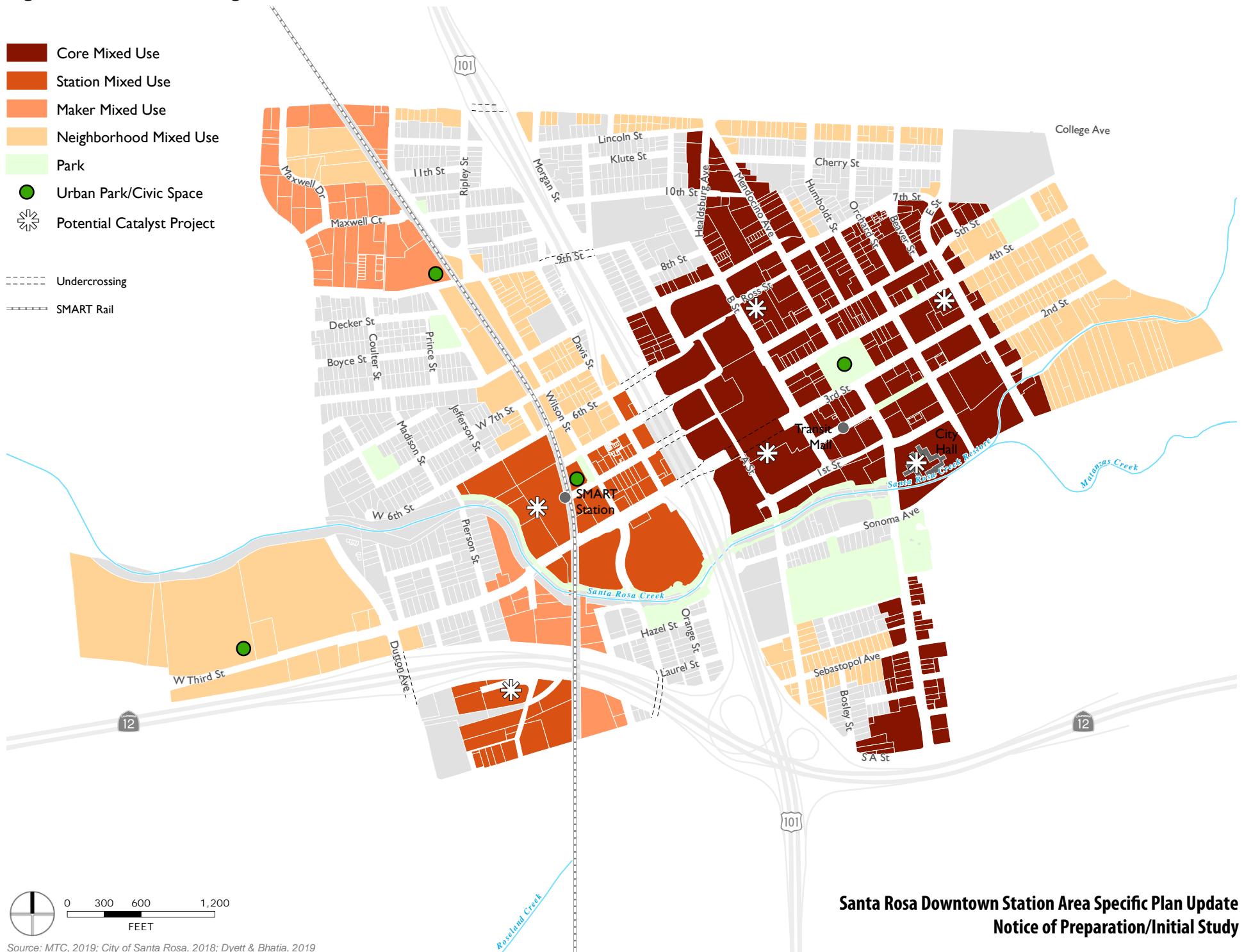
Principal Components

The Proposed Plan is an update to the 2007 DSASP intended to streamline and simplify the regulatory framework, facilitate development consistent with the community vision for the planning area, and update development standards and design guidelines to promote vibrant, livable environments downtown. The key components of the Proposed Plan are outlined below. As described above, the planning area boundary would be extended to the east to be consistent with the eastern boundary of Santa Rosa's Downtown Core, as defined in the City's General Plan. These planning boundary changes are shown in Figure 1.

Land Use and Development Regulations

The Proposed Plan introduces a streamlined set of land use designations applicable in areas with clusters of vacant and under-utilized land where change is foreseeable. Outside of these areas, no change to the land use framework is envisioned and the current land use designations from the General Plan would remain in force. Overall, the Proposed Plan reduces the number of downtown land use designations from 14 to 9 and provides descriptions intended to recognize and enhance the character of various distinct downtown districts. These land uses are shown in Figure 4.

Figure 4: Land Use Changes



Source: MTC, 2019; City of Santa Rosa, 2018; Dyett & Bhatia, 2019

Proposed Plan land use designations include:

- **Core Mixed Use** - The Core Mixed Use (CMU) designation is intended to foster a vital mix of residential, retail, office, governmental, entertainment, cultural, educational, and hotel uses to activate the greater Courthouse Square area and key transit corridors. The principal objectives of the CMU designation are to strengthen the role of this area today as a business, governmental, retail, and entertainment hub for the city and the region, and to provide for significant new multi-family residential development that will extend the hours of activity and create a built-in market for existing and new retail, services, and entertainment uses. High-rise development in single-use or mixed-use buildings is envisioned in a walkable environment with public gathering places such as plazas, courtyards, or parks and easy access to public transit.
- **Station Mixed Use** - The Station Mixed Use (SMU) designation is intended to foster a range of visitor-serving uses, including retail, restaurants, entertainment, cultural amenities, and hotels in proximity to the Downtown SMART station. While commercial uses are emphasized, new multi-family housing will also be allowed to support the daytime and evening vitality of the area. New development will complement the unique character of Railroad Square, adding to the mix of uses and enhancing the walkable, pedestrian-oriented streets and public spaces that attract local residents, SMART train riders, and visitors from Santa Rosa and the wider region throughout the day and the week.
- **Maker Mixed Use** - The Maker Mixed Use (MMU) designation emphasizes a balanced mix of residential, creative, and maker-oriented uses, including artisan shops, studios, media production, printing and publishing, distilleries and micro-breweries, cannabis, tech start-ups, research and development facilities, limited light industrial uses, and home-based businesses. Multi-family residential units are encouraged in single or mixed-use buildings, as are live/work units. Supportive uses that contribute to a vibrant village atmosphere, such as bodegas, specialty food stores, cafes, coffee shops, performing arts venues, theatres, restaurants, schools, and educational facilities are also permitted.
- **Neighborhood Mixed Use** - The Neighborhood Mixed Use (NMU) designation is intended to provide for new multi-family residential development in mixed- or single-use buildings, together with a broad mix of uses that primarily serve local area residents, including professional office, retail, entertainment, service, and other supporting uses. Housing development typologies envisioned include low- and mid-rise apartments and condominiums, as well as small-lot single-family attached dwellings (e.g., duplexes, triplexes, townhomes). Live-work spaces and maker-oriented uses are permitted subject to performance standards. Street design that integrates pedestrian, bicycle, and vehicular use and incorporates traffic-calming features and on-street parking will be required.
- **Active Ground Floor Overlay** - This overlay requires that new development activate the ground floor of buildings with uses and/or design techniques that promote comings and goings and enhance the pedestrian environment. Active ground floor uses include retail and service establishments, restaurants, cafes, bars and brew pubs, co-working spaces, art and craft studios, and other substantially similar uses. Building design that optimizes pedestrian access; facade length and articulation; and window coverage will be required. The intent is to provide developers with a menu of options from which 2 or more items

must be selected. The overlay would apply at locations within mixed use areas where retail currently exists and where enhanced walkability and vitality is desired.

Instead of conventional bulk controls such as height limits and front, rear, and side setback requirements as under the 2007 DSASP, the Proposed Plan would promote the structure of a vibrant core and village centers with a map-based system that establishes a maximum base FAR for various subareas downtown, with minimum FAR for some locations set at half of the maximum. The maximum FAR would apply to all uses on a given site and there would be no height limits. Instead, building heights would effectively be regulated by maximum FAR and the size of the parcel. This system provides simplicity and flexibility for development. Projects that propose housing and other community benefits, such as affordable housing, childcare, and publicly accessible open space will be eligible for bonus FAR incentives, which can be offered as part of a community benefit program. In some locations, the provision of on-site performance space, public art, and improved lighting may also be considered a community benefit, given the interest expressed by community members throughout the process. Figure 5 shows the maximum base FAR permitted under the Proposed Plan in change areas throughout the planning area.

To thoughtfully manage transitions between neighborhoods and ensure the compatibility of new development, the Proposed Plan will include development standards and design guidelines suited to the context, including standards and guidelines for downtown, station, and neighborhood transitions as shown in Figure 6. To simplify and streamline design guidelines, the Proposed Plan removes the multiple Streets and Corridors designations and instead requires ground floor activation in key areas to foster walkability and vitality. Uses and techniques that activate the ground floors of buildings such as retail, restaurants, cafes, bars, art galleries, co-working office spaces and other uses that promote foot traffic will be allowed in all mixed use designations but required in certain key areas in order to promote concentrations that lead to walkability and vitality. In these same locations, building design techniques that optimizes pedestrian access; facade length and articulation; and window coverage will be required.

Circulation Improvements

Many of the 2007 DSASP connectivity improvements centered around reunification of the square and improving the pedestrian realm along key corridors. Circulation improvements as part of the Proposed Plan aim to improve connectivity between the downtown core, including Courthouse and Railroad squares, new neighborhood growth in Maxwell Court and Roberts Avenue subareas, and existing neighborhoods. Proposed Plan improvements will build on public realm enhancements to enhance safety, provide a more pleasing pedestrian experience, and support pedestrian and bicycle-oriented connections. These improvements are shown in Figure 7. In addition to these circulation improvements and pedestrian enhancements, the Proposed Plan also will also promote improved wayfinding to showcase,

Figure 5: Maximum Base Floor Area Ratio (FAR) for Change Areas

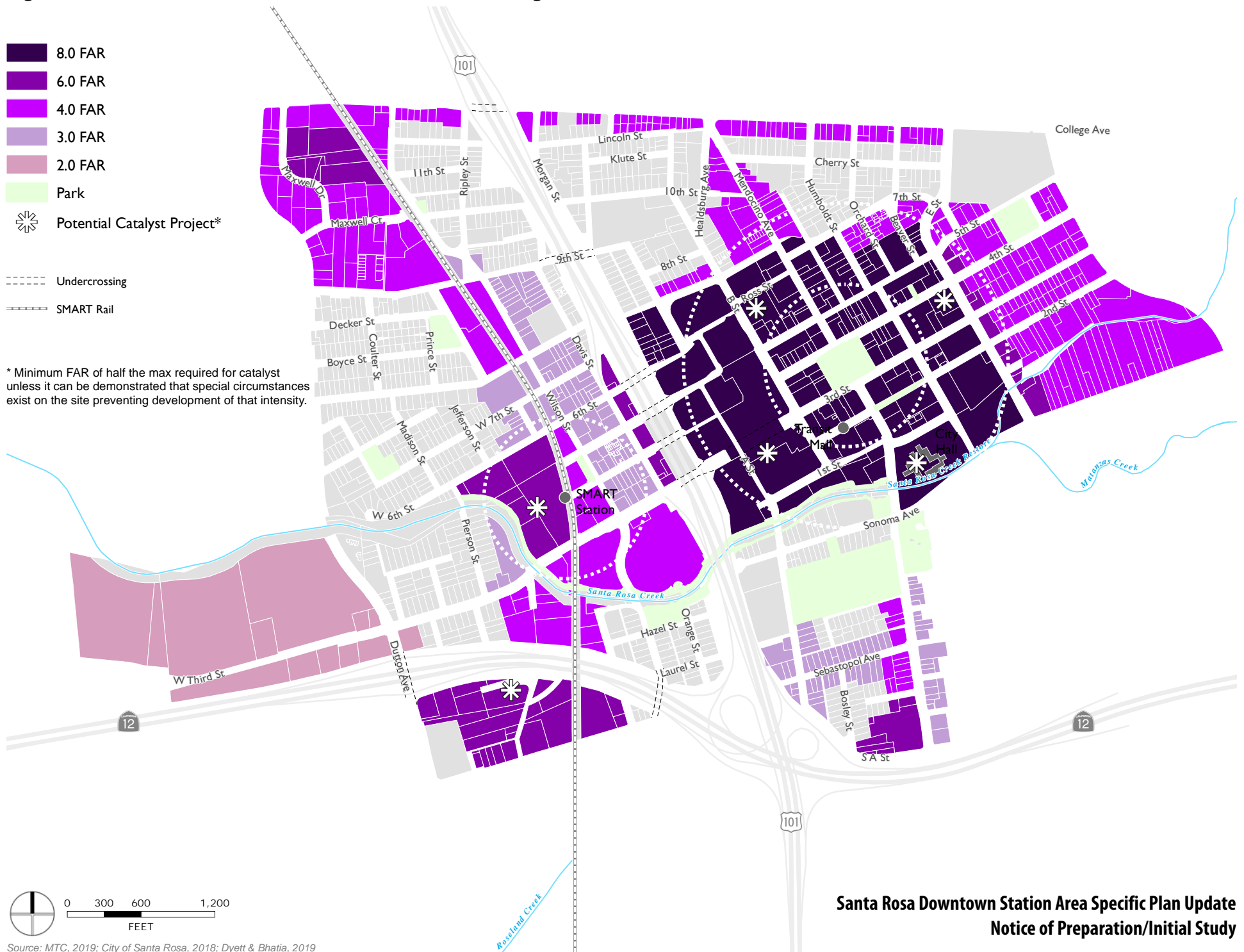
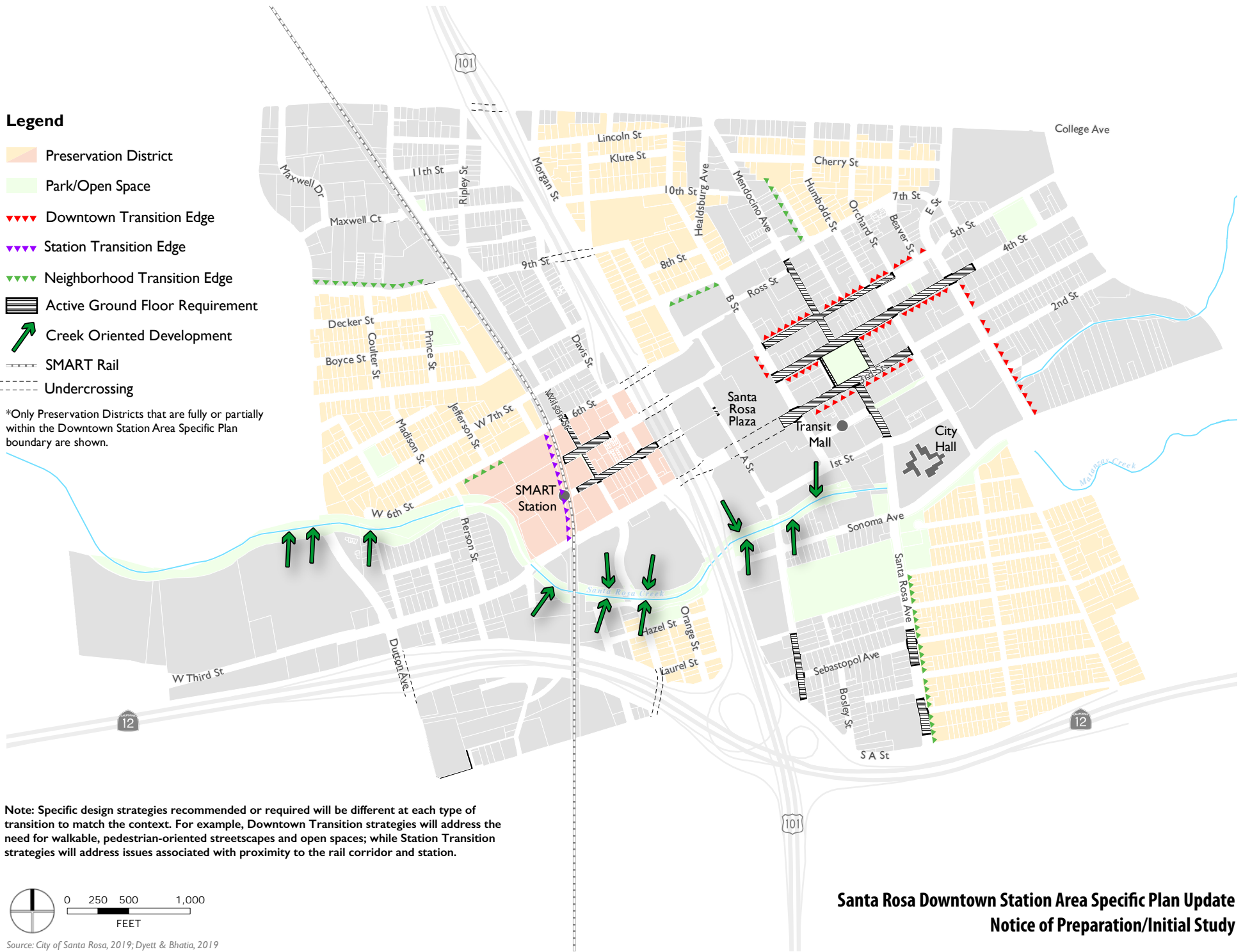


Figure 6: Special Design Considerations

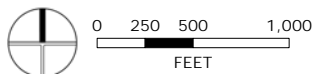
Legend

- Preservation District
- Park/Open Space
- Downtown Transition Edge
- Station Transition Edge
- Neighborhood Transition Edge
- Active Ground Floor Requirement
- Creek Oriented Development
- SMART Rail
- Undercrossing

*Only Preservation Districts that are fully or partially within the Downtown Station Area Specific Plan boundary are shown.



Note: Specific design strategies recommended or required will be different at each type of transition to match the context. For example, Downtown Transition strategies will address the need for walkable, pedestrian-oriented streetscapes and open spaces; while Station Transition strategies will address issues associated with proximity to the rail corridor and station.



Source: City of Santa Rosa, 2019; Dyett & Bhatia, 2019

connect, and improve navigation to downtown’s cultural, historical, and recreational assets. Examples include a “cultural points of interest” walking tour and map, unique and visually consistent signage, or informational kiosks.

The 2007 DSASP included several improvements that are carried forward or slightly modified in the Proposed Plan. These include:

- A Donahue Street roadway extension north across Ninth Street to support new development at Maxwell Court.
- A Roberts Avenue roadway connection through Highway 12 between Sebastopol Road and Third Street, crossing at an existing underpass adjacent to the SMART rail corridor. As part of the Proposed Plan, the connection would be implemented within the existing right-of-way rather than creating an widened underpass.
- A multimodal Fourth Street connection through Santa Rosa Plaza Mall to connect Courthouse and Railroad squares. In the Proposed Plan, this connection may be achieved programmatically and is emphasized as a bicycle and pedestrian connection rather than a roadway.
- A multimodal connector street at the SMART site, connecting Third Street and Sixth Street.
- Safe pedestrian crossings of Santa Rosa Avenue in the Park and Gardens Sub-Area. While the Mill Street crossing improvement has been implemented, the Proposed Plan recommends improvements at Juilliard Park Drive and Oak Street.
- Guidelines for new development along Santa Rosa Creek in the Specific Plan Area ensuring significant “eyes on the creek” and a level of comfort for pedestrians and bicyclists during daytime and evening hours. In the Proposed Plan, this includes a bicycle and pedestrian pathway near City Hall.
- A new connection under Highway 101 at Sixth Street providing a link from the Railroad Square Sub-Area to the Courthouse Square Sub-Area. In the Proposed Plan, this is envisioned as a bicycle and pedestrian improvement.

In addition to these improvements, the Proposed Plan also includes improvements to bicycle and pedestrian infrastructure and public realm improvements in each of the planning area’s neighborhoods.

The **Courthouse Square** area includes several key circulation improvements:

- Underpasses at Third, Fourth, Fifth, Sixth, and Olive streets are activated with lighting, public art, wayfinding, and space for pop up uses like retail, food, live performances, recreation activities, and other events to strengthen the connection to/from the core and Railroad Square.
- A high-frequency trackless trolley runs in a loop primarily along Third Street links Courthouse Square and the Sonoma-Marin Area Rail Transit (SMART) station.
- Roadway reallocations on Mendocino Avenue (from Fourth Street to Tenth Street) and E Street (from College Avenue to Sonoma Avenue) reduce number of traffic lanes and provide improved safety and connectivity for pedestrians and cyclists.

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- Redevelopment of the City Hall complex with high density housing presents an opportunity to daylight the creeks that run under the site, with added bicycle and pedestrian improvements alongside the creek.
- Traffic calming roundabouts occur at the intersections of Sixth and A Streets and Seventh and A Streets.

Maxwell: A Donahue extension (see above) promotes better connectivity for new residential development. A new high-visibility crosswalk at the intersection to provide pedestrian access for local residents of the West End neighborhood and new housing on former industrial sites flanking the railroad tracks. Lighting and artwork in the Ninth Street underpass strengthen the connection between this village center and the St. Rose neighborhood to the east.

SMART: Housing is oriented to provide easy pedestrian access to the SMART station and Railroad Square via the at-grade rail crossing to the east. A new north-south roadway (see above) connects Sixth Street and West Third through the site, providing access for CityBus and improving intra-modal transfers to commuters.

Roberts: Sebastopol Road becomes a multi-modal corridor with high-frequency transit connections into the urban core and an enhanced bicycle and pedestrian route via the Joe Rodota Trail. Trail access is improved for pedestrians and cyclists along the SMART tracks from the SMART Station to Sebastopol Road, and the street experience along Olive Street is enhanced to provide a stronger connection and safer path of travel for pedestrians, bicycle riders, and drivers.

Juilliard: Santa Rosa Avenue undergoes a lane reallocation (known as a road diet) and is transformed into a grand boulevard lined with higher density housing and trees. High-visibility crosswalks (see above) further enhance walkability and vitality. Separated bicycle lanes and high-frequency transit service along the corridor strengthen Santa Rosa Avenue as a multi-modal gateway into the urban core.

Optimized signal timing, crosswalk markings and other improvements for better pedestrian connectivity and safety will occur at the following intersections:

- Maxwell Court and the new Donahue Street extension
- Ninth Street and Donahue Street
- Ross Street and Healdsburg Avenue
- B Street and Fourth Street
- Third Street and Santa Rosa Avenue
- West Third Street and the SMART rail tracks
- First Street and A Street
- Santa Rosa Avenue and Juilliard Park Drive
- Santa Rosa Avenue and Oak Street
- Sebastopol Road and the SMART rail tracks

Parking

The Proposed Plan waives parking requirements for development within the planning area to promote denser development and more efficient use of space. Instead, developers would be free to provide parking in line with market demand and the lending requirements of financial institutions. The parking waiver effectively “unbundles” parking in areas with viable alternatives to the automobile and lets the market decide how much to build. It loosens a constraint for developers and provides flexibility. It would be part of a holistic parking management strategy that could include shared parking between adjacent land uses with different peak parking demand times; a residential parking permit program in existing neighborhoods; on-demand bike share and scooters; and others. The 2007 DSASP also emphasized shared parking and “unbundled” parking at residential developments, although it did not waive parking requirements.

Plazas, Parks and Civic Spaces

The Proposed Plan promotes entertainment and activities in flexible, publicly accessible “civic spaces” that attract residents and visitors downtown and build vibrancy and sense of place. Civic spaces would be created by enhancing existing spaces in Courthouse Square and Depot Park, as well as by creating new public spaces in Imwalle and Maxwell Court.

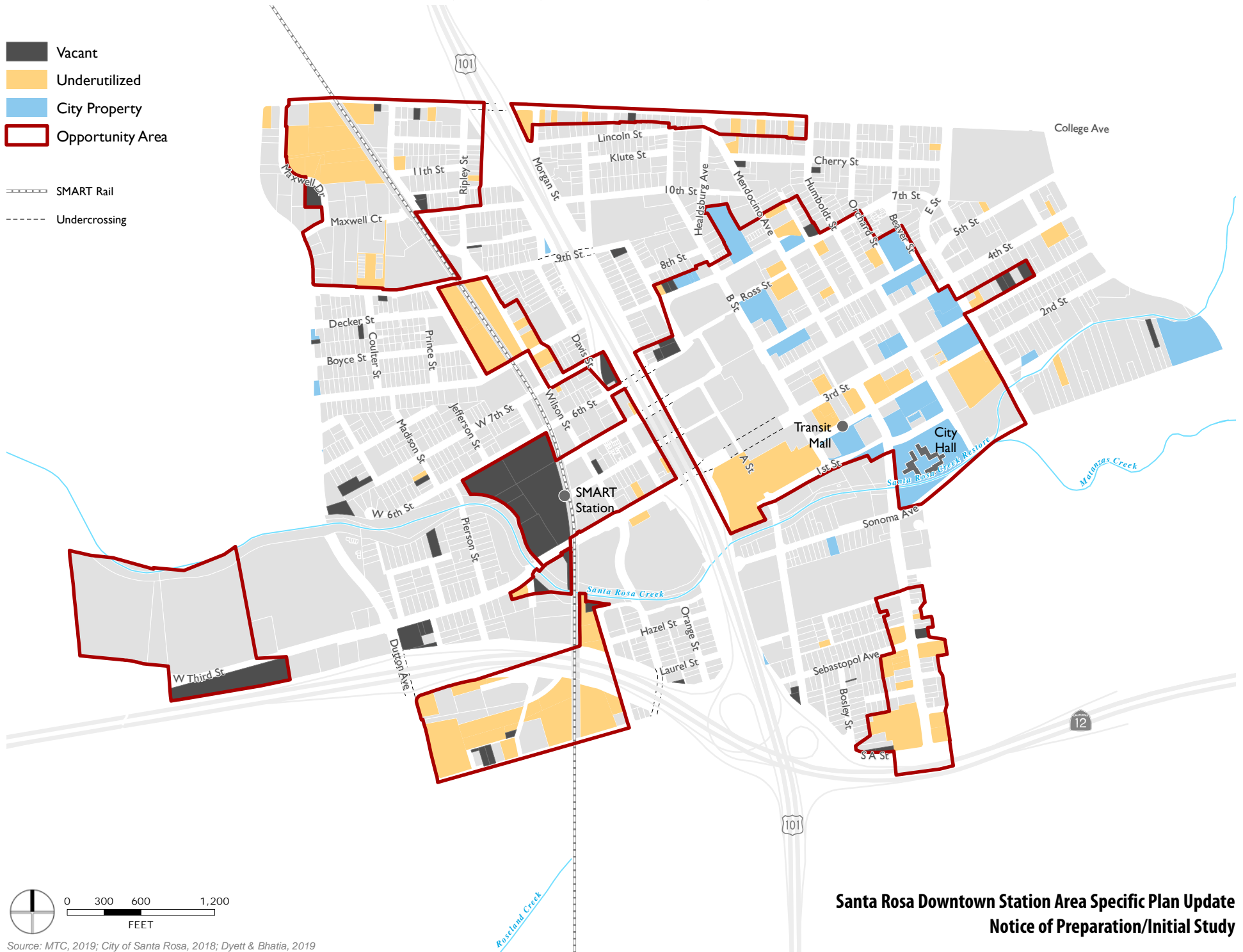
BUILDOUT PROJECTIONS

Table 2 presents a comparison of the projected increase in population, housing units, and jobs under the 2007 DSASP (as analyzed in the EIR) and the Proposed Plan. Overall, the Proposed Plan is expected to result in 16,800 new residents, 7,000 new housing units, and 828,485 additional square feet in non-residential uses in the planning area by 2040. This represents 3,750 more housing units; 8,675 people; and 513,120 additional square feet in non-residential uses than the 2007 DSASP. Buildout of the Proposed Plan is expected to occur primarily on vacant, underutilized sites and certain key City-owned properties throughout the planning area, as shown in Figure 8. Additionally, The Proposed Plan identifies several key sites in the core area that represent opportunities for development through public-private partnerships that proves the market for high-density housing in Santa Rosa. Redevelopment is prioritized for one or more of these sites as a demonstration project to catalyze similar developments.

PROBABLE ENVIRONMENTAL AFFECTS

Based on the findings of this Initial Study, the City of Santa Rosa intends to prepare a Subsequent EIR (SEIR) for the Proposed Plan. When deciding whether to approve the Proposed Plan, the Santa Rosa City Council must consider the prior EIR as revised by the SEIR; however, pursuant to CEQA Section 15162, a Subsequent EIR need contain only the information required to make the prior EIR adequate for analysis of the project as revised and may be circulated by itself without recirculating the previous draft or final EIR. A subsequent shall be given the same notice and public review as required under Section 15087 or Section 15072 and shall state where the previous document is available and can be reviewed.

Figure 8 Vacant Land, Underutilized Parcels, City Property, and Opportunity Areas



Source: MTC, 2019; City of Santa Rosa, 2018; Dyett & Bhatia, 2019

Table 2. Buildout Comparison, 2007 DSASP and Proposed Plan

	<i>DSASP 2007</i>	<i>Proposed Plan</i>	<i>Net Increase over 2007 DSASP</i>
Housing Units	3,250	7,000	3,750
Population ¹	8,125	16,800	8,675
Retail (s.f.)	296,260	297,840	1,580
Office (s.f.)	56,415	263,850	207,435
Industrial (s.f.) ²	(-699,300)	(-105,230)	73,200
Service (s.f.)	141,120	372,025	230,905
Total s.f. gain	493,800	828,485	513,120

¹ Buildout calculated at 2.5 persons per household for 2007 DSASP; 2.4 persons per household for Proposed Plan.

²The Proposed Plan adds 73,200 s.f. of industrial space, but replaces 178,430 s.f. with housing, resulting in a net loss of 105,230 s.f. The 2007 DSASP did not add any industrial square footage, but replaced 699,300 s.f. of industrial space with other uses.

As documented in the checklists and impact analysis included in this Initial Study, in comparison to the analysis contained in the 2007 EIR, implementation of the Proposed Plan would potentially result in new or substantially more severe impacts related to the following environmental resource categories, and further analysis in the SEIR is needed to confirm:

- Air Quality
- Tribal and Cultural Resources
- Hydrology and Water Quality
- Noise and Vibration
- Traffic and Transportation
- Energy, Greenhouse Gases, and Climate Change
- Public Services and Recreation
- Utilities and Service Systems

Therefore, these resource categories will be evaluated in the SEIR. It has been determined on the basis of the findings documented in this Initial Study that other resource categories would either not be significantly affected by the Proposed Plan or were adequately examined and fully mitigated in the 2007 EIR. As such, these other resource categories will not be further analyzed in the SEIR.

Table 2. Buildout Comparison, 2007 DSASP and Proposed Plan

	<i>DSASP 2007</i>	<i>Proposed Plan</i>	<i>Net Increase over 2007 DSASP</i>
Housing Units	3,250	7,000	3,750
Population ¹	8,125	16,800	8,675
Retail (s.f.)	296,260	297,840	1,580
Office (s.f.)	56,415	263,850	207,435
Industrial (s.f.) ²	(-699,300)	(-105,230)	73,200
Service (s.f.)	141,120	372,025	230,905
Total s.f. gain	493,800	828,485	513,120

¹ Buildout calculated at 2.5 persons per household for 2007 DSASP; 2.4 persons per household for Proposed Plan.

²The Proposed Plan adds 73,200 s.f. of industrial space, but replaces 178,432 s.f. with housing, resulting in a net loss of 105,232 s.f. The 2007 DSASP did not add any industrial square footage, but replaced 699,303 s.f. of industrial space with other uses.

As documented in the checklists and impact analysis included in this Initial Study, in comparison to the analysis contained in the 2007 EIR, implementation of the Proposed Plan would potentially result in new or substantially more severe impacts related to the following environmental resource categories, and further analysis in the SEIR is needed to confirm:

- Air Quality
- Tribal and Cultural Resources
- Hydrology and Water Quality
- Noise and Vibration
- Traffic and Transportation
- Energy, Greenhouse Gases, and Climate Change
- Utilities and Service Systems

Therefore, these resource categories will be evaluated in the SEIR. It has been determined on the basis of the findings documented in this Initial Study that other resource categories would either not be significantly affected by the Proposed Plan or were adequately examined and fully mitigated in the 2007 EIR. As such, these other resource categories will not be further analyzed in the SEIR.

Environmental Analysis

AESTHETICS

Aesthetics Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
a. Have a substantial adverse effect on a scenic vista;	4.1-17	Yes	No		N/A
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;	4.1-18	No	No		N/A
c. Substantially degrade the existing visual character or quality of the site and its surroundings; If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or	4.1-16	Yes	No		N/A
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	4.1-19	No	No		N/A

Criterion 1a

The 2007 EIR notes that US 101 and Highway 12, which pass through the planning area, are identified as scenic corridors in the Santa Rosa General Plan and that views of Taylor Mountain, such as are available from the E Street corridor in the planning area, are protected as well. Given that development under the 2007 DSASP would be required to comply with existing City policy established to protect scenic corridors, including General Plan Policy UD-A-1 and Policy UD-A-5, and to adhere to the City's adopted design guidelines, the 2007 EIR found that implementation of the 2007 DSASP would result in less than significant impacts related to scenic vistas. Development under the Proposed Plan would also be required to comply with existing City policies and adhere to adopted design guidelines. Therefore, as with the 2007 DSASP, impacts to scenic vistas under the Proposed Plan would be less than significant.

Criterion 1b

The 2007 EIR determined that the adoption and implementation of the 2007 DSASP would result in a less than significant impact related to degradation of scenic views within designated State scenic highways, as there are no designated State scenic highways within the planning area.

While the stretch of Highway 12 from east of US 101 to Highway 121, a portion of which runs through the southern part of the planning area, is eligible for designation as a State Scenic Highway, it is not currently officially designated as such.¹ Therefore, similar to the 2007 DSASP, the Proposed Plan would not result in a significant impact related to degradation of scenic views within designated State scenic highways.

Criterion 1c

The 2007 EIR found that implementation of the 2007 DSASP would result in less than significant impacts related to the degradation of visual character, as adherence to the City's adopted design guidelines and the additional standards in the 2007 DSASP governing height and character would ensure compatibility with existing character.

Based on the 2019 CEQA Guidelines, in urbanized areas such as the planning area, significant impacts related to degradation of visual character would result if the Proposed Plan was inconsistent with applicable zoning and other regulations governing scenic quality. The Proposed Plan would focus new development and redevelopment primarily in opportunity areas where vacant and underutilized commercial properties are clustered and would not involve land use and zoning changes outside of these areas. Therefore, outside of opportunity areas existing zoning and City design guidelines would continue to apply. For opportunity areas and for transitional edges between opportunity areas and established neighborhoods, the Proposed Plan will include development standards and design guidelines developed with community input to ensure that new development is compatible with and enhances the surrounding context. Once the Proposed Plan is approved by the City Council, the Zoning Code and other City planning and regulatory documents would be updated for consistency with the approved Plan, thereby eliminating conflicts. As such,

¹ California Department of Transportation, State Scenic Highway program, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways> accessed on November 19, 2019.

the Proposed Plan would result in less than significant impacts with respect to the degradation of visual character and quality, as with the 2007 DSASP.

Criterion 1d

The 2007 EIR determined that the adoption and implementation of the 2007 DSASP would result in a potentially significant impact related to glare from multi-story buildings adjacent to US 101 and Highway 12 within the planning area prior to mitigation. To address this impact, the 2007 DSASP included Mitigation Measure AES-1 requiring the use of building materials designed to reduce lighting glare in the construction of structures adjacent to US 101 and Highway 12, including windows treated with glare reductive coating or film covering, matte-finish tiles, marble, or sheet metal and non-reflective flashing material. With implementation of this mitigation measure, the 2007 EIR found that associated impacts would be less than significant.

As with the 2007 DSASP, the Proposed Plan would result in new buildings adjacent to US 101 and Highway 12 that could potentially be constructed with reflective materials; however, implementation of Mitigation Measure AES-1 would be required and would reduce potential impacts from the Proposed Plan to a less than significant level.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the 2007 EIR, implementation of the Proposed Plan would not substantially increase the severity of impacts identified, nor would it result in new significant impacts related to aesthetics that were not identified in the 2007 EIR. Since the approval of the 2007 DSASP, no new information has emerged, nor have environmental conditions changed such that, new environmental impacts pertaining to these impact categories would be expected to emerge or previously identified impacts would become more severe.

AGRICULTURAL RESOURCES

Agricultural Resources Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
a. Convert Prime Farmland or Unique Farmland to non-agricultural use;	4.8-34	No	No	No	N/A
b. Conflict with an existing zoning for agricultural use, or a Williamson Act contract;	4.8-35	No	No	No	N/A
c. Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production;	Not analyzed	No	No	No	N/A
d. Result in the loss of forest land or conversion of forest land to non-forest use; or	Not analyzed	No	No	No	N/A
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	4.8-35	No	No	No	N/A

Criteria 2a and 2b

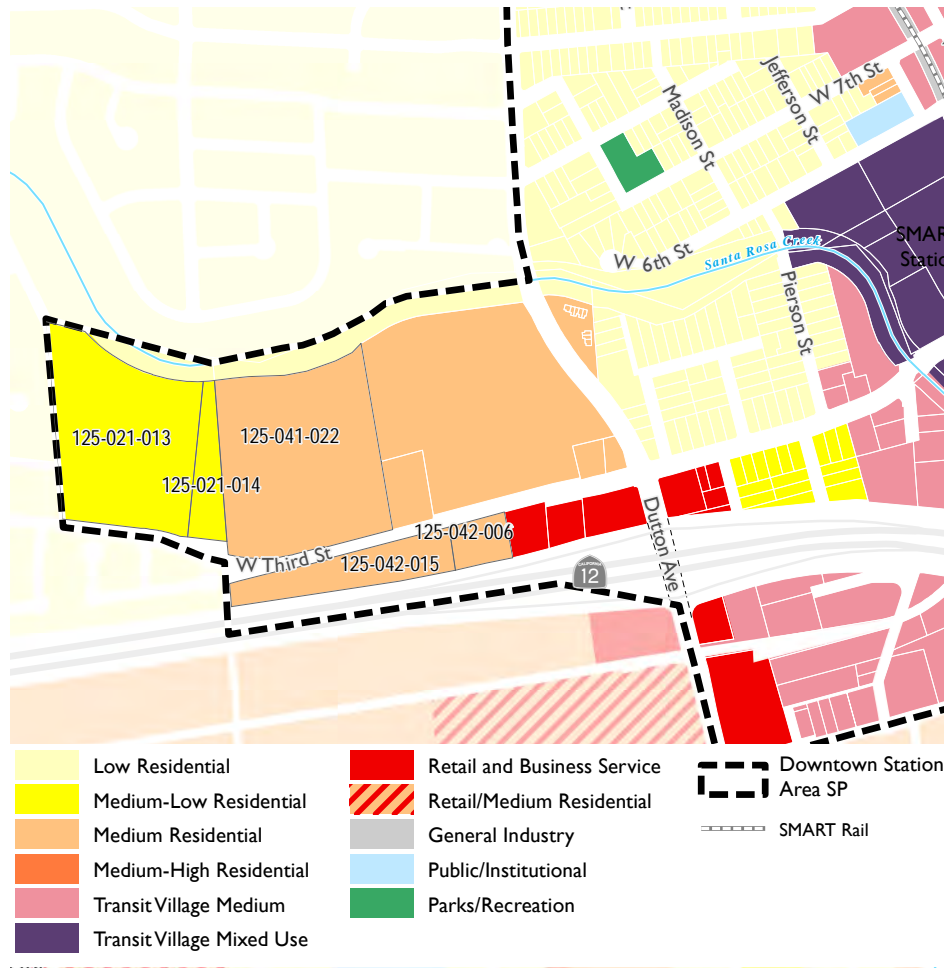
The 2007 EIR determined that impacts related to conversion of Farmland and conflicts with Williamson Act contracts or agricultural zoning would be less than significant. The 2007 EIR noted that three parcels in the western portion of the planning area in the vicinity of Imwalle Gardens were classified as Prime Farmland by the California Farmland Mapping and Monitoring Program (FMMP), but that all three had previously been designated and zoned for residential uses. The 2007 DSASP applied a new Medium Density Residential land use designation to two of these three parcels and retained the Medium Low Density Residential designation on the third. As such, the 2007 DSASP converted the use on two of the parcels from one residential use to another, and therefore the 2007 EIR found impacts with respect to conversion of Prime Farmland would be less than significant. Further, the 2007 EIR noted that none of the three parcels was under Williamson Act contract and found associated impacts to be less than significant.

According to the latest available FMMP mapping, there are two parcels in the western portion of the planning area that are classified as Prime Farmland and one parcel that is classified as Farmland of Local Importance, as shown on Figure 9. APN-125-041-022, APN-125-042-015 and APN-125-042-006 are currently designated Medium Density Residential in the 2007 DSASP and the City of Santa Rosa General Plan, while APN-125-021013 and APN-125-021-014 is designated Medium Low Density Residential. A residential development project has been approved and is under construction on APN-125-021-013, consistent with the land use designations in the 2007 DSASP and the General Plan. APN-125-042-015 and APN-125-042-006, located south of West Third Street, is currently vacant.

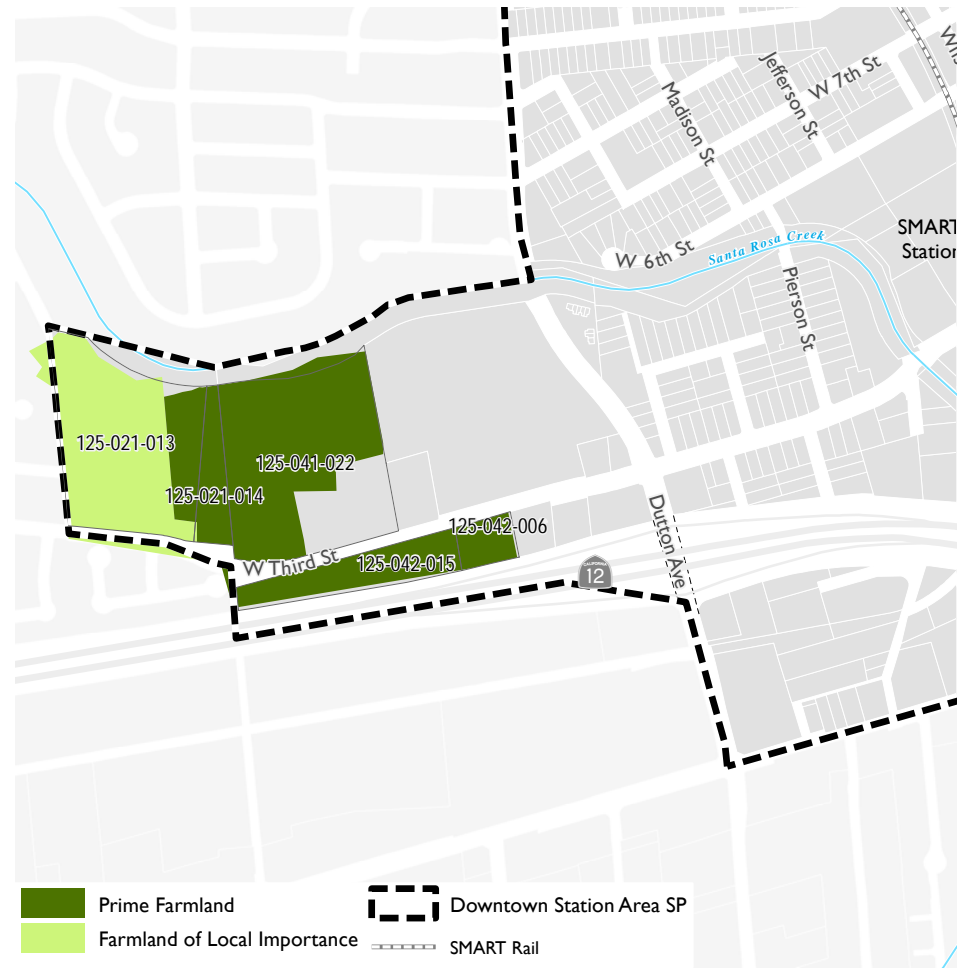
The Proposed Plan would apply a new Neighborhood Mixed Use designation to these parcels, which allows for new multi-family residential development in mixed- or single-use buildings, together with a broad mix of uses that primarily serve local area residents, including professional office, retail, entertainment, service, and other supporting uses. As such, the Proposed Plan would convert these parcels from one residential use designation to another, as with the 2007 DSASP. Therefore, the Proposed Plan would not result in a new or substantially more adverse impact than identified in the 2007 EIR, and impacts related to the conversion of Farmland to non-agricultural uses would be less than significant, as with the 2007 DSASP. Further, according to a countywide map of 2019 Williamson Act parcels prepared by the Sonoma County Permit and Resource Management Department, none of the three parcels is under Williamson Act contract and as such associated impacts would be less than significant, as with the 2007 DSASP.²

²County of Sonoma, Permit and Resource Management Department, "Williamson Act 2019 Calendar Year," <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKewjOmrOjmoHmAhWJjQIHYJOCLwQFjAAegQIAhAC&url=http%3A%2F%2Fsonomacounty.ca.gov%2FWorkArea%2FDownloadAsset.aspx%3Fid%3D2147565785&usg=AOvVaw2rBVQ9Km0ndWSM7OAihBbU>, accessed on November 20, 2019.

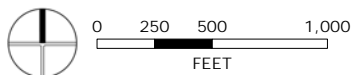
Figure 9: Prime Farmland and Farmland of Local Importance in the Planning Area



General Plan Land Use Designations



FMMP Classifications (2019)



Source: Sonoma County GIS, 2019; City of Santa Rosa, 2018; Dyett & Bhatia, 2019

Criteria 2c and 2d

The California Public Resources Code defines forest land as "land at least 10 percent occupied by trees of any size that are native to California, including native oaks, or formerly having had that tree cover and not currently zoned for uses incompatible with forest resource management."³ Further, the California Government Code, defines timberland as "privately owned land, or land acquired for state forest purposes, which is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, and which is capable of growing an average annual volume of wood fiber of at least 15 cubic feet per acre."⁴ The planning area is highly urbanized and there is no land within its boundaries that meets these definitions. Therefore, implementation of the Proposed Plan would have no impact with respect to the loss or conversion of forest land or timberland.

Criterion 2e

The 2007 EIR found that the 2007 DSASP would result in less than significant impacts related the conversion of Farmland or forest land due to other changes in the existing environment. As described above, the Proposed Plan would not result in direct impacts related to the conversion of Farmland or forest land, similar to the 2007 DSASP, nor would the Proposed Plan result in indirect impacts such as by inducing the conversion of adjacent Farmland or forestland outside the planning area to non-agricultural or non-forest uses, as there is no Farmland or forest land in areas adjacent to the planning area. Therefore, associated impacts from the Proposed Plan would be less than significant, as with the 2007 DSASP.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the 2007 EIR, implementation of the Proposed Plan would not substantially increase the severity of any impacts identified in the 2007 EIR, nor would it result in new significant impacts related agricultural resources that were not identified in the 2007 EIR. Further, since the certification of the 2007 EIR, no new information has emerged, nor have environmental conditions changed such that, new environmental impacts would be expected to result or previously identified impacts would become more severe.

³ California Public Resources Code, Division 4, Part 2.5 Forest Resources, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=4.&title=&part=2.5.&chapter=1.&article=, Accessed on November 20, 2019.

⁴ California Government Code, Division 1, Part 1, Chapter 6.7, https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=1.&title=5.&part=1.&chapter=6.7.&article=1., Accessed on November 20, 2019.

AIR QUALITY

Air Quality Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
a. Conflict with or obstruct implementation of the applicable air quality plan;	4.2-33	Yes	Yes		Further analysis required in SEIR
b. 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;	4.2-24	Yes	Yes		Further analysis required in SEIR
c. Expose sensitive receptors to substantial pollutant concentrations;	4.2.-29	Yes	Yes		Further analysis required in SEIR
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people;	4.2.-33	Yes	No		N/A

Criteria 3a and 3b

The 2007 EIR found that the 2007 DSASP would result in a less than significant impact with respect to conflicts with the Bay Area Air Quality Management District's (BAAQMD) 2005 Ozone Strategy, designed to achieve a region-wide reduction of ozone precursor pollutants through the expeditious implementation of all feasible measures. The 2007 EIR noted that while growth in the planning area under the 2007 DSASP would exceed Santa Rosa General Plan projections for the area, the increase in jobs and housing units would be concentrated primarily in high-density developments in close proximity to transit consistent with smart growth principles. As such, while the increased amount

of growth in the planning area would result in higher emissions of ozone precursor pollutants, the 2007 DSASP would result in a lower per capita vehicle miles traveled, consistent with the intent of the 2005 Ozone Strategy. However, air quality modeling performed to forecast daily regional pollutant emissions for the 2007 DSASP determined that the 2007 DSAP would result in net new emissions exceeding the BAAQMD threshold of 80 pounds per day for both reactive organic gases (ROG) and particulate matter (PM). In response, the 2007 EIR included Mitigation Measure AQ-2 which requires that developers of projects in the planning area implement emissions control measures to reduce overall emissions from traffic and area sources, including measures to promote the use of transit, bicycling, and walking instead of private vehicles. With implementation of this measure, the 2007 EIR determined that associated impacts would be less than significant.

In 2017, BAAQMD adopted a Clean Air Plan, which provides an integrated control strategy to reduce criteria pollutants including ozone, particulate matter, toxic air contaminants, and greenhouse gas (GHG) emissions in a manner consistent with federal and State air quality programs and regulations. The Bay Area as a whole is in non-attainment for the federal and State 8-hour standards for carbon monoxide as well as the federal 24-hour standard for PM_{2.5}.⁵ Reducing criteria pollutants for attainment of these standards is a key focus of the 2017 Clean Air Plan.

BAAQMD CEQA Guidelines do not include a plan-level significance threshold for construction-related emissions of criteria pollutants; however, operational emissions of criteria pollutants from implementation of a specific plan are considered less than significant if the following can be demonstrated: consistency with current Air Quality Plan control measures contained in the 2017 Clean Air Plan, and projected VMT or vehicle trip increase is less than or equal to projected population increase.⁶ Given that the Proposed Plan would result in an increase in service population of 8,675 over that projected for the 2007 DSASP, total criteria pollutant emissions and total VMT resulting from the Proposed Plan would be greater than under the 2007 DSASP. As such, additional analysis is required in the SEIR to quantify criteria pollutant emissions and VMT than can be expected from the Proposed Plan and evaluate the effectiveness of Mitigation Measure AQ-2 in addressing 2040 Proposed Plan conditions. Additionally, analysis of consistency with Clean Air Plan control measures is also required in the SEIR.

Criterion 3c

The 2007 EIR identified a potentially significant impact related to TAC exposure for future residents of new housing immediately adjacent to US 101. Prolonged exposure to TACs such as diesel particulate matter from trucks on US 101 over a period of 70 years could increase the risk of cancer above the established threshold. To address this risk, the 2007 EIR stipulated implementation of Mitigation Measure AQ-3, requiring project-specific analysis to assess and address associated health risk for projects proposed within 170 feet of the near lane of US 101, and Mitigation Measure AQ-4, requiring the implementation of buffers between emissions sources and sensitive land uses. With implementation of these measures, impacts were found to be less than significant.

⁵ Bay Area Air Quality Management District, Clean Air Plan, 2017, page 2-6.

⁶ Bay Area Air Quality Management District, CEQA Guidelines, 2017, page 2-7.

As with the 2007 DSASP, the Proposed Project would allow construction of residential buildings adjacent to US 101, Highway 12, and other high-volume roadways. Land use regulations in the Proposed Plan would allow for taller buildings than permitted under the 2007 DSASP and as such could potentially expose more residents to elevated levels of TACs. Further, traffic volumes have changed since the time the 2007 EIR was prepared and new State laws governing vehicle emissions have come into force such that an update to the health risk assessment is warranted. Therefore, additional analysis is required in the SEIR to characterize exposure to TACs and to confirm the effectiveness of mitigation measures from the 2007 EIR.

Criterion 3d

The 2007 EIR determined that implementation of the 2007 DSASP would result in a less than significant impact related to odors, as no specific uses that would create objectionable odors were anticipated beyond uses anticipated and previously analyzed in the Santa Rosa General Plan EIR. The Proposed Plan, however, includes a new Maker Mixed Use land use designation which allows for a balanced mix of residential, creative, and maker-oriented uses, including artisan shops, studios, media production, printing and publishing, distilleries and micro-breweries, cannabis, tech start-ups, research and development facilities, limited light industrial uses, and home-based businesses. Some of these uses not anticipated in the General Plan EIR for downtown Santa Rosa could potentially generate odors in proximity to sensitive residential receptors. Therefore, additional analysis is required in the SEIR.

Conclusion

The Proposed Plan would result in 3,750 more housing units, 8,675 more residents, and 513,120 additional non-residential square feet than anticipated in the 2007 EIR and as such total criteria pollutant emissions and total VMT resulting from the Proposed Plan would be greater than under the 2007 DSASP. Additionally, the Proposed Plan could result in greater numbers of residents in proximity to TACs from high-volume roadways and the Maker Mixed Use designation could potentially generate odors in proximity to sensitive residential receptors not previously analyzed and mitigated. Further, since the certification of the 2007 EIR, new State laws governing vehicle emissions have come into force. BAAQMD has adopted a Clean Air Plan with new control measures and new CEQA Guidelines, and traffic volumes in the planning area have changed. Therefore, changes associated with the Proposed Plan and changes in circumstances and information that have occurred since certification of the 2007 EIR are of sufficient scale and scope that new or substantially more adverse impacts related to air quality could result. Therefore, additional analysis is required in the SEIR.

BIOLOGICAL RESOURCES

<p>Biological Resources Would the project:</p>	<p>Where Impact Was Analyzed in 2007 DSASP FEIR</p>	<p>Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?</p>	<p>Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?</p>	<p>Any Substantially Important New Information Requiring New Analysis or Verification?</p>	<p>Do Plan FEIR Mitigation Measures Address/Resolve Impacts?</p>
<p>a. Have a substantial adverse effect, either directly or through habitat modifications, on special-status species;</p>	<p>4.3-16</p>	<p>No</p>	<p>No</p>		<p>Yes</p>
<p>b. Have a substantial adverse effect on riparian habitat and/or other sensitive natural communities in the Planning Area;</p>	<p>4.3-18</p>	<p>No</p>	<p>No</p>		<p>Yes</p>
<p>c. Have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, or other means;</p>	<p>4.3-19</p>	<p>No</p>	<p>No</p>		<p>N/A</p>
<p>d. Interfere with the movement of native wildlife species;</p>	<p>4.19-19</p>	<p>No</p>	<p>No</p>		<p>Yes</p>
<p>e. Conflict with any local policies or ordinances protecting biological resources; or</p>	<p>4.19-21</p>	<p>No</p>	<p>No</p>		<p>N/A</p>
<p>f. Conflict with provisions of an adopted Habitat Conservation Plan, or other approved plan.</p>	<p>4.19-21</p>	<p>No</p>	<p>No</p>		<p>N/A</p>

Criteria 4a, 4b, 4c

The 2007 EIR determined that the adoption and implementation of the DSASP would have a potentially *significant* impact on special Status species, riparian habitats, and migratory corridors prior to mitigation.

As described in the 2007 EIR, implementation of the DSASP would be subject to the City's Stormwater Management Program requirements; existing regulations such as monitoring programs implemented by the USFWS and CDFG; and guidelines and policies such as creek setbacks established by the City of Santa Rosa and Sonoma County Water Agency, which could reduce anticipated impacts. However, restoration projects in or in the vicinity of Santa Rosa Creek, development adjacent to the creek, and development projects involving habitat removal, such as tree removal or structure removal or remodeling of existing buildings, could potentially impact Chinook salmon and steelhead, a migratory species; Allen's hummingbird, other nesting birds, and nursery bats; and riparian habitat adjacent to the creek.

To address this impact, the 2007 DSASP included Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4a, and BIO-4b, which require that development minimize disturbance to waterways and riparian vegetation to avoid impacts to salmonids and create monitoring plans for projects that have potential to impact nesting species. With implementation of these mitigation measures, the 2007 DSASP found that associated impacts would be less than significant.

As with the 2007 DSASP, the Proposed Plan would result in new development adjacent to the creek, which could potentially impact sensitive species, migratory species, or riparian habitat; however, implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, BIO-4a, and BIO-4b would be required and reduce potential impacts from the Proposed Plan to a less than significant level.

Criterion 4d

The 2007 EIR determined that the adoption and implementation of the DSASP would have no impact to federally protected wetlands, as the planning area did not include any federally protected wetlands, including marshes, vernal pools, or coastal areas as defined by Section 404 of the Clean Water Act. There have been no changes in circumstances or new information such that new or more substantially severe impacts to wetlands would result. Thus, similar to the findings in the 2007 DSASP EIR, the Proposed Plan would result in no impact to federally protected wetlands.

Criterion 4e

The 2007 EIR determined that the adoption and implementation of the DSASP would not conflict with local, regional, State, or federal habitat conservation plans, as the planning area is not included in any formal Habitat Conservation Plans. There is no new information or change in circumstance such that new or more substantially severe impacts would occur. Thus, similar to the findings in the 2007 EIR, implementation of the DSASP Update would result in no impacts to conservation plans.

Criterion 4f

The 2007 EIR determined that the adoption and implementation of the DSASP would not conflict with local policies or ordinances protecting biological resources and result in a less than significant impact, as it was designed to be compliant with goals and development guidelines in the Santa Rosa General Plan Open Space and Conservation Element, as well as with existing policies and regulations for creek water quality and restoration established by City of Santa Rosa Zoning Code, the Santa Rosa Creek Design Guidelines, the Sonoma County General Plan, Santa Rosa Waterways Plan and the Santa Rosa Creek Master Plan. The City also requires a City permit for tree removal. As with the 2007 DSASP, implementation of the Proposed Plan would adhere to existing policies and ordinances protecting biological resources. Therefore, similar to the 2007 DSASP, the Proposed Plan would not result in a significant impact.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the 2007 EIR, implementation of the DSASP Update should not increase the impacts identified, or result in new significant impacts, pertaining to biological resources. Provided the Proposed Plan require mitigation measures identified as part of the 2007 EIR to reduce significant impacts to special status species, riparian habitats, or migratory corridors, impacts should be reduced to a less than significant impact. Because no information or environmental circumstances have changed related to the presence of wetlands or inclusion in Habitat Conservation Plans, no impacts should occur under the Proposed Plan. Adherence to existing policies and regulations and ordinances related to protection of biological resources would result in a less than significant impact under the Proposed Plan. In considering these impacts in full, analysis conducted as part of the 2007 EIR should be sufficient, and further analysis of biological resources not required as part of a SEIR.

CULTURAL AND TRIBAL RESOURCES

Cultural and Tribal Resources Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
a. Cause a substantial change to the significance of a historical resource pursuant to §15064.5;	4.4-15	Yes	Yes	Yes	Further analysis required in SEIR
b. Cause substantial adverse change in the significance of an archaeological resource pursuant to §15064.5;	4.4-16	Yes	Yes	Yes	Further analysis required in SEIR
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	4.4-17	No	No	No	N/A
d. Disturb any human remains, including those interred outside of dedicated cemeteries; or	4.4-17	No	No	No	N/A
e. Cause a substantial adverse change in the significance of a tribal cultural resource.	Not analyzed	Yes	Yes	Yes	Further analysis required in SEIR

Criteria 5a and 5b

The 2007 EIR determined that development under the 2007 DSASP could potentially result in substantial adverse impacts to archaeological and historic resources in the planning area. Additionally, the 2007 EIR found that the demolition, construction, renovation and/or relocation of buildings under the 2007 DSASP could potentially result in an adverse impact to the historical character or setting of a preservation district within the planning area. While existing State and local regulations would reduce these potential impacts, the 2007 EIR also required the implementation of mitigation measures: CULT-1a and CULT-2a requires all projects be referred to the Northwest Information Center (NWIC) to determine the likelihood of the proposed project adversely affecting any cultural resources and to develop project specific mitigation; CULT-1b requires that if a project is located in an area with known sensitive archaeological resources, the project shall prepare and implement an Archaeological Testing, Monitoring, and Data Recovery Plan (ATMDRP); CULT-1c requires the City to initiate consultation with Native American tribes in order to establish the likelihood and potential of any adverse impacts to Native American cultural or sacred places, including human burials and to establish the appropriate treatment of such resources; CULT-2b requires any potential adverse impacts to historical resources to be evaluated on a project specific level in accordance with local, State, and federal regulations; CULT-2c addresses that any thoroughfare widening projects shall be designed to not detract from the character of the historic building or property; CULT-2d mandates that a worker orientation program which reviews regulations and measures for minimizing impacts to historical resources shall be conducted prior to construction in sensitive areas; and CULT-3a and CULT-3b restricts the use of excessive vibration-causing or pile-driving equipment for construction zones near historic or potentially significant historical resources. The 2007 EIR found that implementation of these mitigation measures would reduce associated impacts to a less than significant level.

The 2007 EIR identified several known archaeological resources in the planning area based on a records search at the Northwest Information Center. An updated records search is needed to determine whether additional archaeological resources have been discovered through surveys in the intervening years since certification of the 2007 EIR, and to consider additional properties within the expanded planning area between E Street and Brookwood Avenue. Therefore, additional analysis is required in the SEIR to determine whether there would be new or substantially more adverse impacts related to archaeological resources from implementation of the Proposed Plan.

The 2007 EIR also identified a number of historic and potentially historic structures in the planning area. Since the 2007 EIR was certified, a number of other properties in the planning area have become "age-eligible" for historic designation, meaning they are over 50 years old and require some level of evaluation to determine whether or not they are historically significant. Therefore, while development under the Proposed Plan could potentially result in adverse impacts to historic resources in the planning area as with the 2007 DSASP, the passage of time means that there are additional properties that could potentially be impacted. As such, additional analysis is required in the SEIR to determine the historic significance of properties which have become "age-eligible" since certification of the 2007 EIR.

Criteria 5c and 5d

The 2007 EIR determined that impacts related to the destruction of paleontological resources and the disturbance of human remains from the 2007 DSASP would be less than significant, as there were no known paleontological resources or human remains in the planning area and as compliance with existing General Plan policies and State regulations would ensure that damage to any such resources accidentally discovered during construction activities under the 2007 DSASP would be avoided to maximum extent practicable.

As part of the Proposed Plan, the boundaries of the planning area would be extended eastward to Brookwood Avenue to accommodate an additional 70 acres; however, a search of the University of California Museum of Paleontology Specimen Search database confirmed that as of November 2019 there are no known paleontological resources in the entirety of the planning area.⁷ Additionally, a search of the Native American Heritage Commission's Sacred Lands File in 2019 indicated that there are no known Native American burial sites within the planning area as of April 2019.⁸ Further, as with the 2007 DSASP, compliance with existing General Plan policies and State regulations would ensure that damage to any paleontological resources or human remains accidentally discovered during construction activities under the Proposed Plan would be avoided to maximum extent practicable. Therefore, similar to the 2007 DSASP, impacts related to the destruction of paleontological resources and disturbance of human remains from the Proposed Project would be less than significant.

Criterion 5e

In 2017, the State of California amended its CEQA Guidelines to require the analysis of impacts to Tribal Cultural resources, defined in the Public Resources Code as sites, features, places, geographically-defined cultural landscapes, sacred places, or objects with cultural value to a California Native American tribe. This represents a change in circumstances that could potentially result in new impacts not previously identified in the 2007 EIR. Therefore, additional analysis related to Tribal Cultural resources is required in the SEIR.

Conclusion

With the passage of time since certification of the 2007 EIR, additional properties in the planning area have become "age-eligible" for historic designation and an updated records search is needed to determine whether additional archaeological resources have been discovered in the planning area, including on properties within the expanded planning area. This represents a change in circumstances that could potentially result in new or substantially more adverse impacts as compared to those analyzed in the 2007 EIR. As such, additional analysis related to archaeological and historic resources is required in the SEIR. Further, in 2017 the State of California amended its CEQA Guidelines to require the analysis of impacts to Tribal Cultural resources and additional analysis will also be required in the SEIR to address this topic, including formal consultation with tribes pursuant to AB 52. However, as there are no known paleontological resources or human

⁷ University of California Museum of Paleontology, Specimen Search Database, <https://ucmpdb.berkeley.edu>, accessed on November 20, 2019.

⁸ Native American Heritage Commission, Email communication, April 15, 2019.

remains in the planning area and as compliance with existing regulations would reduce potential impacts to such resources in the event of accidental discovery during construction activities under the Proposed Plan, associated impacts resulting from implementation of the Proposed Plan would be less than significant as with the 2007 DSASP and no additional analysis is required for these topics in the SEIR.

GEOLOGY AND SOILS; MINERAL RESOURCES

<p>Geology and Soils</p> <p>Would the project:</p>	<p>Where Impact Was Analyzed in 2007 DSASP FEIR</p>	<p>Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?</p>	<p>Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?</p>	<p>Any Substantially Important New Information Requiring New Analysis or Verification?</p>	<p>Do Plan FEIR Mitigation Measures Address/Resolve Impacts?</p>
<p>a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction, or landslides;</p>	<p>4.5-15</p>	<p>No</p>	<p>No</p>		<p>Yes</p>
<p>b. Result in substantial soil erosion and topsoil loss;</p>	<p>4.5-20</p>	<p>No</p>	<p>No</p>		<p>N/A</p>
<p>c. Be located on unstable soil or result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;</p>	<p>4.5-15</p>	<p>No</p>	<p>No</p>		<p>Yes</p>
<p>d. Locate structures on expansive soil, as defined</p>	<p>4.5-15</p>	<p>No</p>	<p>No</p>		<p>Yes</p>

Geology and Soils Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
in Section 1803.5.3, Expansive Soil, of the California Building Standards Code (2013), creating substantial risks to life or property;					
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or	4.5-24	No	No		N/A
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	4.4-17	No	No		Yes
Mineral Resources					
g. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state; or	4.5-24	No	No		N/A
h. 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	4.5-24	No	No		N/A

Criteria 6a, 6c, and 6d

The 2007 EIR determined that there was a less than significant impact related to earthquake fault rupture as there are no Earthquake Fault Zones within the planning area. However, the 2007 EIR determined that the adoption and implementation of the 2007 DSASP would result in a potentially significant impacts related to ground shaking, liquefaction, expansive soils, and landslides within the planning area prior to mitigation. To address significant impacts, the 2007 EIR included Mitigation Measures GEO-1a, GEO-1b, GEO-2, and GEO-4, which reduce the threat of structural damage or collapse due to liquefaction, ground shaking, and expansive soils impacts by requiring buildings to be built to current adopted building codes and by requiring a thorough subsurface geotechnical investigation performed under the direction of a licensed Geotechnical Engineer and/or a Certified Engineering Geologist to evaluate the soils and establish mitigation measures for each site. While the planning area is not known to be located within an earthquake induced landslide zone, Mitigation Measure GEO-3 was included to reduce seismically induced slope failure that may exist along portions of the Santa Rosa Creek by requiring a streambank stability analysis to examine the effect of a new structure on bank stability. With implementation of these mitigation measures, the 2007 EIR found that associated impacts for ground shaking, liquefaction, expansive soils, and landslides would be less than significant.

In general, the 2007 EIR found that soils conditions are suitable for development and may be engineered in accordance with the California Building Code and other geotechnical requirements to provide sufficient foundation for structures. The planning area slope is easterly at approximately 0.5 percent and geologic maps show no landslides that threaten the planning area since the area is nearly flat, so the risk of slope failure on the majority of the planning area is considered low.

Subsequent to certification of the 2007 EIR, on August 24, 2014 magnitude 6.0 earthquake occurred along the southern portion of the West Napa fault and exposed fault segments which had not been previously recognized. Additionally, a United States Geological Survey Working Group on California Earthquake Probabilities study completed in 2014 now estimates there is a 72-percent probability between 2014 and 2044 that a M6.7 or greater magnitude earthquake will occur in the San Francisco Bay region. The combined Hayward-Rodgers Creek fault is considered to have an elevated probability of an earthquake during the study period of 2014 to 2044. The nearest active earthquake fault zone to the Specific Plan area is the Healdsburg-Rodgers Creek fault, which passes approximately 1.4 miles east of the Santa Rosa Downtown SMART Station site and 3,500 feet east of the eastern edge of the specific plan area. Other nearby Alquist-Priolo active earthquake fault zones include the Maacama fault (10 miles north), San Andreas fault (17 miles southwest), West Napa fault (24 miles southeast), Green Valley fault (28 miles east) and Hayward fault (32 miles southeast). These faults are shown in Figure 10.

While circumstances have changed and new information regarding seismic conditions and faulting have become available since 2007, Mitigation Measures GEO-1a, GEO-1b, GEO-2, GEO-3, and GEO-4 would apply to development under the Proposed Plan and would reduce impacts related to strong seismic ground shaking and seismic-related ground failure (including liquefaction) and landslides to the maximum extent practicable. Therefore, as determined in the 2007 EIR, associated impacts from the Proposed Plan would be less than significant.

Criterion 6b

The 2007 EIR determined that the impact of the adoption and implementation of the 2007 DSASP on soil erosion or the loss of topsoil was less than significant as there are existing City policies and General Plan requirements for erosion control measures that would apply to the planning area for individual development or redevelopment projects proposed under the Specific Plan. As these same existing City policies and regulations would also apply to development under the Proposed Plan, similar to the 2007 DSASP, impacts related to soil erosion or loss of topsoil from the Proposed Plan would be less than significant.

Criterion 6c

As with the 2007 DSASP, future development that may result from implementation of the Proposed Plan would not require septic systems or other, alternative wastewater disposal systems. Therefore, implementation of the Proposed Plan would have no impact related to the location of structures on soils incapable of supporting septic tanks or alternative wastewater disposal systems.

Criterion 6f

The 2007 EIR determined that there were no paleontological resources that exist on the project site itself and that due to the built-up urban nature of the planning area, there is a very low possibility of finding any paleontological or unique geologic resources, thus resulting in a less than significant impact. Furthermore, the General Plan has adopted policies outlined in HP-A-2 and HP-A-3 in addition to federal and State statutes that would be invoked in response to finding such paleontological or geologic resources to protect these resources from disturbance and destruction. The Proposed Plan is not expected to have additional impacts on paleontological or geologic resources. Therefore, similar to the 2007 DSASP, the Proposed Plan would not result in a significant impact related to paleontological or geologic resources.

Criteria 6g and 6h

The 2007 EIR determined that there was no impact related to the loss of known mineral resources and no impact related to mineral recovery sites, as no mineral resources and no mineral recovery sites in the planning area. The planning area, including the added as part of the Proposed Plan, is located in a highly urbanized area and is not shown on maps of known mineral resource zones prepared pursuant to the Surface Mining and Reclamation Act. Therefore, as with the 2007 DSASP, the Proposed Plan would result in no impact.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the 2007 EIR, implementation of the Proposed Plan would not substantially increase the impacts identified to soils, geology, and mineral resources, or result in new significant impacts. Although a new fault exposure caused by the 2014 South Napa earthquake represents new information not addressed in the 2007 EIR, the existing earthquake mitigation measures included in the 2007 EIR and up-to-date building code standards would be applicable such that no new environmental impacts would be expected to emerge or previously identified impacts would become more severe.

HAZARDS AND HAZARDOUS MATERIALS AND WILDFIRES

Hazards and Hazardous Materials Would the project:	Where Impact Was Analyzed in Plan FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
a. Create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials;	4.6-20	No	No	No	Yes
b. Create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;	4.6-20	No	No	No	N/A
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of an existing or proposed school;	4.6-22	No	No	No	Yes

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Hazards and Hazardous Materials Would the project:	Where Impact Was Analyzed in Plan FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
d. Be located on a site which is included on a list of hazardous materials sites compiled and, as a result, create a significant hazard to the public or environment;	4.6-22	No	No		Yes
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 uses airport, the project could result in a safety hazard for people residing or working in the project area;	4.6-24	No	No		N/A
f. Could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or	4.6-24	No	No		Yes
g. Expose people or structures either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires.	4.6-25	No	No		N/A

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Hazards and Hazardous Materials Would the project:	Where Impact Was Analyzed in Plan FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
Wildfire	If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
h. Substantially impair an adopted emergency response plan or emergency evacuation plan;	N/A	No	No	No	N/A
i. 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;	N/A	No	No	No	N/A
j. 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; or	N/A	No	No	No	N/A

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Hazards and Hazardous Materials Would the project:	Where Impact Was Analyzed in Plan FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
k. 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.	N/A	No	No	No	N/A

Criteria 7a and 7b

The 2007 EIR determined that the adoption and implementation of the 2007 DSASP would result in less than significant impact related to hazards associated with transport, use, and disposal of hazardous materials and a less than significant impact with mitigation for instances of accidental release of hazardous materials. As described in the 2007 EIR, existing General Plan policies and various other local, county, State, and federal hazardous materials regulations are considered adequate to mitigate for risk. To address the significant impact of accidental release of hazardous materials, the 2007 EIR included Mitigation Measure HAZ-1a, which requires each sub-development to prepare and implement a post development Stormwater Pollution Prevention Plan (SWPPP), and HAZ-1b, which requires businesses to register and be compliant with the Hazardous Materials Business Plan (HMBP) and Hazardous Waste Generator Program and Accidental Release Program when applicable. With inclusion of these two Mitigation Measures, the impacts to accidental release of hazardous materials were less than significant. In addition, the 2007 DSASP calls for a reduction in industrial zoning which should result in a decreased risk from an industrial accident, chemical spill, or other such accident most foreseeable on an industrial site.

The Proposed Plan does not contain any changes or circumstances that would cause new or substantially more severe changes from the 2007 DSASP relating to hazardous materials exposure to the public. Likewise, no new information is needed that would require analysis or verification. Therefore, similar to the 2007 DSASP, the Proposed Plan would not result in a significant impact related to hazardous materials exposure if the Proposed Plan included the same or had similar mitigation measures.

Criterion 7c

The 2007 EIR determined that the adoption and implementation of the 2007 DSASP would result in less than significant impact related to hazardous materials in proximity to schools due to no new development of factories or other major emitters are being proposed in the planning area and that existing hazardous materials policies and other existing restrictions are considered adequate mitigation. There have been no new or proposed changes to increase hazardous emitters or handling of hazardous materials since adoption of the 2007 DSASP. Therefore, implementation of the Proposed Plan would be expected to have less than significant impact in relation to hazardous materials proximate to schools. These conditions will not change under implementation of the 2007 EIR, and environmental impact is thus not anticipated to change.

Criterion 7d

The 2007 EIR determined that the adoption and implementation of the 2007 DSASP would result in less than significant impact with mitigation related to potential development at hazardous materials sites. The 2007 DSASP calls for a reduction in industrial zoning and many previous industrial uses have been designated for residential or commercial redevelopment. As described in the 2007 EIR, there are several industrial properties throughout the planning area that are either environmentally sensitive sites with a history of contamination or yet to have been evaluated but likely to have some remnant contamination. Existing General Plan policies and various other local, county, State, and federal hazardous materials regulations are considered adequate to mitigate for most risk. To address the significant impact of potential runoff or disturbance of materials when hazardous sites are developed, the 2007 EIR included Mitigation Measures HAZ-2a and HAZ-2b which requires developers to complete at Phase 1 environmental site assessment for each property to be redeveloped and complete site remediation in accordance with OSHA Standards, Santa Rosa Fire Department, Sonoma County Environmental Health Department and State Regional Water Resources Quality Control Board Guidelines. With inclusion of these two mitigation measures, the impacts due to development on potential hazardous materials sites were less than significant.

The Proposed Plan does not contain any changes or circumstances that would cause new or substantially more severe changes from the 2007 DSASP relating to development of hazardous materials sites. Likewise, no new information is needed that would require analysis or verification. Therefore, similar to the 2007 DSASP, the Proposed Plan would not result in a significant impact related to hazardous materials exposure due to hazardous site development if the Proposed Plan included the same or had similar mitigation measures.

Criterion 7e

The 2007 EIR determined that the adoption and implementation of the 2007 DSASP would result in less than significant impact related to hazards associated with public airports within the planning area due to the nearest airport is located six to seven miles northwest of the Specific Plan Area and thus outside the two mile threshold. There have been no new or proposed changes to public airports since adoption of the 2007 DSASP. Therefore, implementation of the Proposed Plan would be expected to have less than significant impact in relation to safety hazards from public airports. These conditions will not change under implementation of the 2007 EIR, and environmental impact is thus not anticipated to change.

Criterion 7f

The 2007 EIR determined that the adoption and implementation of the 2007 DSASP would result a potentially significant impact before mitigation related to emergency response and evacuation due to the scope of new development and potential for interference. To address this impact, the 2007 EIR included Mitigation Measure HAZ-3a, which incorporates City and Fire Department review to ensure plans meet ordinance and uniform building code requirements for emergency access, and Mitigation Measure HAZ-3b, which required the City to revise its Emergency Operations Plan to reflect new development. With inclusion of these two mitigation measures, the impacts to emergency response and evacuation were less than significant.

Buildout of the Proposed Plan is estimated to add an additional 3,750 housing units and 8,675 people over 2007 estimates. This increase could have a potential impact if it impaired implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As the 2007 DSASP proposed an increased development potential, these impacts were found less than significant with implementation of mitigation measures. Therefore, similar to the 2007 DSASP, the Proposed Plan would not result in a significant impact related to emergency response and evacuation plans if the Proposed Plan included the same or had similar mitigation measures.

Criteria 7g through 7k

The 2007 EIR determined that the adoption and implementation of the 2007 DSASP would result in no impact related to wildland fires within the planning area as the area is urbanized and does not border wildlands as shown in Figure 12-5 of the Santa Rosa General Plan. Furthermore, since the physical planning area is located in the middle of the city, it is not near a state responsibly area. While there are parts of Santa Rosa that are considered to be very high fire hazard severity zones as recommended by CAL FIRE, none of these sites are located within or directly adjacent to the planning area.⁹

Since adoption of the 2007 DSASP and certification of the 2007 EIR, the frequency and severity of wildfires in California and in Sonoma County have increased due to multiple sequential years of drought and the increasing effects of anthropogenic climate change. In response, the State of California amended its CEQA Guidelines in 2019 to require additional analysis related to wildfire risks. The planning area is not located in a Very High Fire Hazard Severity Zone designated by the State, nor is it located within the Wildland-Urban Interface (WUI) Area designated by the City.

The City of Santa Rosa is preparing an updated Local Hazard Mitigation Plan (LHMP) in partnership with the County of Sonoma, and the 2016 draft included mitigation actions related to public education and risk reduction in WUI areas. The City of Santa Rosa Fire Department is in the process of developing a Community Wildfire Protection Plan (CWPP) that will serve as a Wildfire Annex to the 2016 LHMP. Given that the planning area is not located in a Very High Fire Hazard Severity Zone or in the WUI area and that high-risk wildfires are relatively infrequent, the Proposed Plan's continued implementation of existing City policies and regulations would result

⁹ State of California Office of the State Fire Marshal, CAL FIRE, Local Responsibility Area for Very High Fire Hazard Severity Zone Maps. https://osfm.fire.ca.gov/media/6005/santa_rosa.pdf Accessed 11/2019.

in less than significant impact related to wildfire. While circumstances pertaining to wildfire risk have changed since 2007, the scale of those changes is not such that substantially more adverse impacts related to wildfire would result from implementation of the Proposed Plan as compared to the 2007 DSASP. Therefore, no additional analysis is required in the SEIR.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the 2007 EIR, implementation of the Proposed Plan would not substantially increase the severity of any impacts identified in the 2007 EIR, nor would it result in new significant impacts related to hazardous materials, public airports, emergency response, or wildland fires. The 2007 EIR identifies multiple mitigation measures associated with hazard impacts which would be required for the Proposed Project to mitigate significant impacts to a less than significant level. Development occurring under the Proposed Plan would be required to comply with City, County, State, and federal regulations pertaining to hazard mitigation and emergency access. Since the approval of the 2007 DSASP, no new information has emerged, nor have environmental conditions changed such that, new environmental impacts would be expected to emerge, or previously identified impacts would become more severe.

HYDROLOGY AND WATER QUALITY

Hydrology and Water Quality Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
a. Violate any water quality standards or waste discharge requirements;	4.7-14	No	No		Yes
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin;	4.7-14 to 4.7-15	Yes	No		Additional analysis required in the SEIR

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Hydrology and Water Quality Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff that may result in flooding on- or off-site; create or contribute runoff water or provide substantial additional sources of polluted runoff; or impede or redirect flood flows;	4.7-15 to 4.7-17	No	No		Yes
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or	4.7-17	No	No		N/A
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Not analyzed	No	No		N/A

Criterion 8a

The 2007 EIR determined that adoption and implementation of the Specific Plan would result in a potentially significant impact to water quality standards from construction of development projects under the 2007 DSASP, especially during site grading activities. Intensification of land uses may also introduce new or additional pollutants, including sediments, trash, petroleum products, metals, and chemicals that could potentially discharge into surface waters either directly or during stormwater runoff events.

To address this impact, the 2007 EIR included Mitigation Measure HYDRO-1, which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for each project site. Mitigation measures required under the SWPPP include erosion control/soil stabilization techniques; Best Management Practices (BMPs) to be implemented at the project site; inspection of drainage facilities for accumulated sediment; description of potential sources of erosion and sediment; and development of a monitoring and implementation plan. General Plan Policies PSF-I-2 and PSF-I-8, which require developers to cover the cost of drainage facilities and implements the Standard Urban Storm Water Mitigation Plan, would also help to mitigate impacts.

As with the 2007 DSASP, implementation of the Proposed Plan would result in construction to develop or redevelop sites; however, implementation of Mitigation Measure HYDRO-1 would be required. This, along with General Plan Policies PSF-I-2, which requires developers to cover cost of drainage facilities; PSF-I-3, which requires erosion and sedimentation control measures; PSF-I-6, which requires implementation of Best Management Practices to reduce discharge; PSF-I-8, which requires implementation of the Standard Urban Storm Water Mitigation Plan (SUSMP); and compliance with the City of Santa Rosa's ordinances on grading, erosion, and sediment control ordinances, in addition to policies that limit sedimentation of local and sediment control ordinances, would reduce potential impacts from the Proposed Plan to a less than significant level.

There are no changes within the Proposed Plan that would substantially change construction activities or land use intensification patterns associated with buildout; thus, the potential impacts to water resources would not change from those identified in the 2007 EIR.

Criterion 8b

The 2007 EIR determined that adoption and implementation of the Specific Plan would result in a less than significant impact to groundwater supplies or recharge based on a Water Supply Assessment completed for the Specific Plan. The Assessment found that groundwater supply anticipated to be pumped (2,300 acre-feet per year) as a share of the water supply needed to support projected growth assumed under the 2007 DSASP would be sufficient.

Like the 2007 EIR, most development under the Proposed Plan would occur on previously developed sites and primarily use water from the Sonoma County Water Agency (SCWA) aqueduct system. General Plan Policies PSF-F-1 PSF-F-3 would also reduce potential impacts by using SCWA aqueduct system water as the primary source and to develop groundwater resources for the purpose of providing a Subsequent water source. However, the Proposed Plan is projected to add an additional 3,750 housing units and 8,675 residents as compared to the 2007 DSASP estimates. A new Water Supply Assessment will need to be conducted in order to determine if more groundwater would need to be pumped to meet this demand. As such, implementation of the Proposed Plan has a potentially significant effect on groundwater supplies or recharge greater than assessed in the 2007 EIR and will need to be assessed more fully as part of the SEIR.

Criterion 8c

The 2007 EIR determined that adoption and implementation of the Specific Plan would result in a less than significant impact to drainage pattern impacts to erosion and siltation if development

complied with existing regulations and permitting processes, including CDFG and SCWA permitting on sites adjacent to Santa Rosa Creek and Laguna de Santa Rosa Watershed, existing creek management plans, and the City's General Plan Policies PSF-I-1 and Policy PSF-I-9, which require dedication, improvement and maintenance of stormwater flow and retention areas as a condition of approval.

The 2007 EIR determined adoption and implementation of the Specific Plan would result in a potentially significant impact to runoff or flood flows due to new paving or surfacing, the addition or removal of storm drain inlets, or other changes to the existing storm drain system. The 2007 planning area was not in a FEMA floodplain and though there was little or no increased risk of redirecting flood flows, flows contributed by the Specific Plan may have an adverse impact on the capacity of storm drain conveyance within the municipal system. General Plan Policies NS-D-3 and NS-C-7 could reduce impacts through requirement incorporation of site drainage plan features and inspection of water storage and conveyance facilities to minimize dam failure.

To reduce impacts to runoff or flood flows, the EIR includes Mitigation Measure HYDRO-3, which requires development of a Storm Drain Master Plan for individual projects that includes design drawings and calculations of the capacity of the proposed storm drain system for the project, SUSMP-recommended BMPs, hydraulic analysis, and Rational Method calculations of pre- and post-development peak flows. With implementation of this mitigation measure, the 2007 DSASP found that associated impacts would be less than significant.

As with the 2007 DSASP, implementation of the Proposed Plan would also result in construction and grading as part of development or redevelopment of sites, which could have potentially significant impacts to erosion, siltation, and capacity of stormwater systems. While General Plan Policies such as PSF-I-1, PSF-I-2, PSF-I-3, PSF-I-4, PSF-I-5, PSF-I-6, PSF-I-8 would reduce impacts by managing, maintaining, and improving stormwater drainage and capacity, and implementation of Mitigation Measure HYDRO-2 would be required and would reduce potential impacts from the Proposed Plan on erosion and siltation to a less than significant level.

General Plan Policies PSF-I-1, PSF-I-4, PSF-I-5, PSF-I-8 PSF-I-9, NS-D-3, NS-D-5, and NS-D-6 would help to reduce impacts to capacity of stormwater systems and flood flows and Mitigation Measure HYDRO-3 would be required as part of implementation of the Proposed Plan. These measures would reduce impacts to a less than significant level, and the associated environmental impact would thus not differ from that identified in the 2007 EIR.

Criterion 8d

The 2007 EIR determined that the planning area was not in a FEMA flood plain, tsunami, or seiche zone, and thus would have no impact on risk of release of pollutants due to project inundation. However, the 2007 EIR did find that adoption and implementation of the Specific Plan would result in a potentially significant impact to non-point source pollutant levels, which may enter the storm drains of the area and ultimately enter Santa Rosa Creek if not controlled through proper Stormwater Pollution Prevention. The EIR included Mitigation Measures HYDRO-2, which requires preparation and implementation of a Specific Plan Area Water Pollution Prevention Program as detailed in Mitigation Measure HYDRO-1. With implementation of this mitigation measure, the 2007 DSASP found that associated impacts would be less than significant.

Sonoma Water is slated to undertake study of additional flood control measures to be paired with creek bed naturalization and the removal of levees, and it is anticipated that this initiative could expand the 100-year flood plain into the downtown planning area. FEMA flood maps would be updated to reflect new conditions in parallel with the Sonoma Water initiative as it is completed. However, as this project has not yet commenced, the future extent of the 100-year flood plain that may result cannot be known and updated FEMA flood hazard maps are not available. Therefore, the planning area remains outside of FEMA-designated flood hazard areas.

As with the 2007 DSASP, implementation of the Proposed Plan would also result in impacts to non-point source pollutant levels; however, implementation of Mitigation Measure HYDRO-2 would be required and would reduce potential impacts from the Proposed Plan on risk release of pollutants to a less than significant level. Thus, the associated environmental impact would not differ from that identified in the 2007 EIR.

Criterion 8e

While this issue was not analyzed under the 2007 EIR, the North Coast Regional Water Quality Control Board oversees surface and groundwater in the Santa Rosa area, and as issued under the North Coast RWQCB Water Quality Control Plan, the Santa Rosa area falls under the Water Quality Control Plan (Basin Plan) for the North Coast Basin. The act requires waste dischargers to notify the RWQCBs of their activities through the filing of Reports of Waste Discharge (RWD) and authorizes the SWRCB and RWQCBs to issue and enforce waste discharge requirements (WDRs), NPDES permits, Section 401 water quality certifications, or other approvals. General Plan Policy PSF-I-5 also helps to reduce impacts by requiring cooperation with the SCWA and the NCRWQCB to conduct regular assessments. Thus, Implementation of the Proposed Plan will comply with policies and requirements of the Water Quality Control Plan for the North Coast Basin, and as such, will have a less than significant impact.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the 2007 EIR, implementation of the DSASP Update has the potential to substantially increase the severity of impacts identified in the 2007 EIR to hydrology and flooding, given the increase of projected housing units and population over estimates in the 2007 EIR and potential for increased water demand that could result in more substantial impacts to groundwater recharge. The 2007 EIR identified several mitigation measures pertaining to hydrological features, including Mitigation Measures HYDRO-1, HYDRO-2, and HYDRO-3, which would be required for development occurring under the Proposed Plan. Development would be required to comply with City regulations designed to preserve water quality and accessibility and prevent hazards and land degradation associated with flooding and related events. The Proposed Plan would not result in new significant impacts to hydrology or flooding. Since the approval of the 2007 DSASP, no new information has emerged, nor have environmental conditions changed such that, new environmental impacts would be expected. In summary, further analysis pertaining to the Proposed Plan's impacts to groundwater recharge in the SEIR is thus required.

LAND USE, POPULATION, AND HOUSING

<p>Land Use, Population, and Housing</p> <p>Would the project:</p>	<p>Where Impact Was Analyzed in 2018 INSP Final EIR (FEIR)</p>	<p>Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?</p>	<p>Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?</p>	<p>Any Substantially Important New Information Requiring New Analysis or Verification?</p>	<p>Do Plan FEIR Mitigation Measures Address/Resolve Impacts?</p>
<p>a. Physically divide an established community;</p>	<p>4.8-30</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>N/A</p>
<p>b. 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;</p>	<p>4.8-31</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>N/A</p>
<p>c. Induce substantial unplanned population growth in an area, either directly (or indirectly (for example, through extension of roads or other infrastructure); or</p>	<p>4.10-12 to 4.10-14</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>N/A</p>
<p>d. Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere.</p>	<p>4.10-14 to 4.10-17</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>N/A</p>

Criterion 9a

The 2007 EIR determined that adoption and implementation of the 2007 Specific Plan would have a less than significant impact in regard to physically dividing an established community through infill development on underutilized and vacant sites, promotion of successful pedestrian bicycle, transit and vehicle circulation pattern and introduction of new population to the center of the City.

Similar to the 2007 DSASP, the Proposed Plan also contains land use, circulation, and design concepts that seek to protect and enhance existing communities and connect communities with the downtown core. Areas of change boundaries under the Proposed Plan are intentional in their preservation of existing neighborhoods. Proposed improvements to existing roadways and infrastructure would not introduce new physical divisions. Proposed new streets are the same as those proposed in the 2007 DSASP and would help provide multi-modal connectivity between and within new and existing residential communities. Pedestrian enhancements aim to improve connections across barriers that already divide the planning area, such as US 101, the SMART rail tracks, and Highway 12. These plans are strengthened by existing goals, policies and regulations established by the General Plan, including UD-B-7, which seeks to enhance transportation linkages in downtown; Policy T-J-3, which requires the City to strengthen and expand east-west linkages across Highway 101; Policy T-K-6, which requires integration of multi-use paths; Policy T-L-4, which requires identification of east-west and north-south bicycle lanes; Policy UD-F-3, which encourages design that avoids walling off neighborhoods; Policy UD-G-4, which provides through-connections for pedestrians and bicyclists in new developments; and others. The Proposed Plan's emphasis on mixed-use, compact development and pedestrian- and bicycle-friendly streets within the Station Area Priority Development Area (PDA) and the opportunities to attract new jobs, retail, and housing are compatible with the goals of *Plan Bay Area* and SB 375. Thus, the Proposed Plan would not result in a significant difference in environmental impact, compared to that identified in the 2007 EIR.

Criterion 9b

The 2007 EIR determined that adoption and implementation of the 2007 Specific Plan would have a less-than-significant impact in regard to compatibility with existing land use plans. While the Specific Plan would require some General Plan Amendments as to bring the General Plan and Specific Plan into complete conformance, the Specific Plan was developed to comply and implement the intent of the General Plan.

The Proposed Plan proposes five new land designations, Core Mixed Use, Station Mixed Use, Maker Mixed Use, and Neighborhood Mixed Use and replaces Transit Village Medium, Transit Village Mixed Use, and Urban Agriculture designations. All other land use designations remain the same as those in the General Plan. Like the 2007 DSASP, implementation would necessitate a General Plan Amendment to the Santa Rosa General Plan to ensure consistency.

The Proposed Plan differs from the EIR in that land use designations in change areas, or areas with new land use designations, do not have an associated density as determined by residential units per gross acre of developable land. Instead, building densities and heights in change areas are regulated by a variety of other factors, such as building floor area ratio, parcel size, special considerations for transition zones, and other regulations covered in the Zoning Code. These conflict with the General

Plan Land Use Element's Land Use Classifications, the Santa Rosa Zoning Code, Santa Rosa Design Guidelines, and the City of Santa Rosa Mid-Rise Policy zoning amendment and would necessitate a General Plan and Zoning Code Amendment to ensure consistency.

Parcels west of the SMART rail tracks are within a Historic (-H) Combining District established in the Zoning Code. The Historic (-H) Combining District applies to all properties within designated preservation districts. This combining district is intended to recognize, preserve, and enhance Santa Rosa's locally designated historic resources and stipulates that no structures shall exceed a maximum height of 35 feet or 2 stories, unless the Cultural Heritage Board (given review authority under Chapter 20-58 of the Municipal Code) finds that increased height does not detract from the character of the preservation district or any adjacent contributing properties. While the Proposed Plan's FAR designations could result in buildings higher than 2 stories, they would still be subject to review and thus would not be in conflict. The Proposed Plan projects an additional 3,750 housing units over the 2007 EIR estimation, for a total of 7,000 housing units over the 20-year planning period. The City's Growth Management Ordinance (GMO) currently caps the total number of multifamily housing permits that can be issued in a given year to 800 citywide and further allows only 200 units in any single development during the same period. Construction of 350 new units per year would be needed to achieve a total of 7,000 new units in the planning area over a 20-year period. While the GMO is an impediment to development, it does not represent a conflict, as the Proposed Plan merely seeks to promote growth and does not require it. Additionally, Senate Bill (SB) 330 suspends housing moratoriums and growth control measures, including caps on annual housing permits, until the bill sunsets in 2025. Any amendments to the GMO, such as exempting housing permits in the planning area from the 200-unit per project per year cap to better align with development phasing, could be made after adoption.

Adoption of the Proposed Plan would require replacement of existing rules, regulations, standards, and maps for change areas in the Planning Area, amending the GMO to exempt downtown development projects from the 200-unit per project per year cap after 2025, and updating the Zoning Code to reflect these new regulations.

Criterion 9c

The 2007 EIR determined a less than significant impact to inducement of unplanned population growth in an area, as growth would be controlled by the City's Growth Management Ordinance. The 2007 DSASP projected an estimated 3,250 housing units, an additional 296,000 square feet of commercial/retail space, 56,000 square feet of office space and 141,000 square feet of public/institutional space, a decrease of 8,600 square feet of heavy industrial space and a decrease of 699,903 square feet of industrial space. within the life of the Specific Plan.

Proposed Plan buildout is estimated to result in an additional 7,000 residential units; 263,850 square feet of office and service uses; 297,840 square feet of retail uses; and a net loss of 105,230 square feet of industrial uses. The net increase over 2007 estimations is 3,750 residential units; 438,340 square feet of office and service uses; 1,580square feet of retail uses; and a difference in net loss of 105,232 square feet of industrial uses.

In the Proposed Plan, no significant amount of projected housing is considered in areas where housing development was not expected to occur under the 2007 DSASP. Future development is

likely to take place largely on previously developed sites served by existing infrastructure. Several large parcels in the Imwalle Gardens area represent the only opportunity sites not currently served by existing infrastructure, and development on vacant parcels in this area would require connections to existing infrastructure in West Third Street.

While the suspension of the growth cap under SB 330 could potentially impact anticipated levels of growth until 2025, growth levels would still be determined by market demand, financing availability, and availability of land and entitlements for that period. As a designated Priority Development Area, the Proposed Plan is designed to help the City of Santa Rosa address ongoing demand for housing within the city and region in a transit-oriented, environmentally sensitive manner. Concentrated development in the heart of the city also reduces pressures to develop on the edge of the city. Additionally, population growth constitutes an adverse environmental impact only to the extent that it would result in other physical environmental impacts in areas (e.g., traffic, air quality, noise, etc). The proposed General Plan's potential impact on these specific environmental topics is analyzed throughout other sections of this IS. By undergoing the Specific Plan update process, the city has identified parcels throughout the city that would be available and appropriate for greater land use intensification and would be able to support the additional population throughout the next several decades. As such, the city is anticipating this growth and is preparing for it in a sustainable and manageable manner. Therefore, in terms of population growth, this impact is considered less than significant.

General Plan Policies that support planned growth include Policy LU-M, which ensures new development improves bicycle circulation improvements; Policy LUL-X-5, which requires new development be pedestrian-oriented; Policy LUL-BB-1, which requires new development provide pedestrian connections and public open spaces; Policy UD-A-5, which requires new development improve visual quality; Policy T-H-3, which requires new development to provide transit shelters; Policy PSF-F-2, which requires water supply capacity and infrastructure to be in place prior to development; Policy NS-D-5, which requires new development reduces project runoff; and other policies promote complete, intentional neighborhoods consistent with the General Plan vision and guiding principles. The General Plan serves as the City's constitution for the physical development of the city and is implemented by the Zoning Ordinance; thus, the aforementioned existing and proposed goals, policies, and programs, and zoning regulations would provide the long-term planning framework for orderly development under the proposed project through the 2040 horizon year. Thus, implementation of the Proposed Project should have a less than significant impact regarding unplanned population growth.

Criterion 9d

The 2007 EIR determined that implementation of the Specific Plan would have a less than significant impact on displacement of people of housing that would necessitate the construction of replacement housing elsewhere. Although potential to displace housing would occur, the 2007 DSASP policies sought to lessen the potential impacts of displacement of existing residents by protecting existing residential neighborhoods, allowing for greater residential development to ensure a no net decrease in housing within the planning area, and maintaining a balance of housing types available at multiple income levels.

Like the 2007 DSASP, The Proposed Plan also have potential to displace people or housing, either directly (but voluntarily on the part of property owners), or indirectly, through property value increases that could inadvertently affect renters without protections. The Proposed Plan would result in an increase of 7,000 new residential units and 828,485 square feet of non-residential land, which would be developed incrementally over the 20-year buildout period. A majority of these units and population would be added to the Courthouse Square area and other neighborhoods without large established residential uses, including Maxwell Court, Wilson-Donahue, and Roberts Avenue. Proposed Plan development projections were only based on vacant parcels, City-owned properties, and low assessed value ratios on non-residential parcels. As such, no existing residential properties would be directly impacted.

General Plan Policies that reduce impacts to displacement include LUL-C-9, which promotes retention of existing housing units through a “no net loss” policy; Policy H-A-5, which promotes conservation and rehabilitation of existing housing stock and discourage intrusion of non-compatible uses into residential neighborhoods; and Policy UD-B-2, which encourages promotion and assistance in development of housing units without Downtown for a mix of income levels and housing types.

Additionally, Santa Rosa’s Housing Action Plan contains five programs that seek to accelerate development of housing at all levels, including increasing inclusionary affordable housing; achieving “affordability by design” in market-rate projects; assembling and offering public land for housing development; improving development readiness; and increasing affordable housing investment and partnerships. The latter includes a program that focuses on acquisition of affordability contracts (housing rehabilitation, extension of contracts, and purchase of contracts), and reducing rental housing barriers, which will help to preserve existing affordable housing units. As part of the forthcoming DSASP Update, an affordability and anti-displacement strategy will also be produced that outlines policies and strategies to prevent displacement in the planning area.

Several housing bills passed in 2019 also encourage housing development and prevent against displacement. These include SB 330, which prohibits demolition of low income, Section 8 or rent controlled apartments without replacement, mandates relocation assistance, and offers right to return to units at the same rents; and AB 1482, which prevents against price gouging and no-cause evictions. Thus, impacts to displacement of existing housing units that require construction of replacement housing elsewhere would occur would be less than significant. Implementation of the changes contained within the Proposed Plan is not anticipated to result in a significant difference in environmental impact, compared to that identified in the 2007 EIR.

Conclusion

Implementation of the Proposed Plan would result in net growth over that anticipated in the 2007 DSASP and 2035 General Plan. Revisions contained in the Proposed Plan would not substantially increase impacts in terms of physically dividing neighborhoods or physically displacing housing or people, and impacts related to unplanned growth would be reduced through compliance with General Plan Policies. Thus, the Proposed Plan would not substantially increase the severity of impacts identified, nor would it result in new significant impacts related to land use, population, or housing that were not identified in the 2007 EIR.

The 2007 EIR did not identify any mitigation measures related to land use, population, and housing, and none would be required for the Proposed Plan. Since the original approval of the 2007 DSASP, several new housing bills have passed that promote and streamline housing development, protect tenants, and remove growth caps on annual housing permits, further reducing potential impacts to displacement. Compliance with General Plan policies regarding infrastructure connections would ensure potential impacts would be less than significant.

NOISE AND VIBRATION

Noise and Vibration Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;	4.9-29	Yes	No	No	Further analysis is required in the SEIR
b. Generate excessive ground-borne vibration or ground-borne noise levels; or	4-9.34	No	No	No	Yes
c. Would be located within an airport land use plan area, or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, but would not expose people residing or working in the project area to excessive noise levels.	4.9-29	No	No	No	N/A

Criterion 10a

The 2007 EIR determined that businesses and residences in the planning area would be intermittently exposed to construction noise levels 15 to 20 dBA or more above ambient, which would be a significant impact. Further, the 2007 EIR determined that residents of new development under the 2007 DSASP would be exposed to outdoor noise levels in excess of 60 Ldn and indoor levels in excess of 45 Ldn, which would exceed the City and State established land use compatibility thresholds prior to mitigation. To address these impacts, the 2007 EIR required implementation of Mitigation Measure NOI-1, stipulating the use of quiet construction equipment and construction noise control measures; Mitigation Measure NOI-2a, requiring that developers prepare site-specific noise studies to determine the area of impact and to present appropriate mitigation measures as needed where new residential development would be exposed to an Ldn of greater than 60 dB; and Mitigation Measure NOI-2b, stipulating that noise-sensitive outdoor uses adjacent to major roadways and freeways be shielded by sound barriers or structures or that sound rated windows and construction methods be used. The 2007 EIR determined that implementation of these measures would reduce impacts to a less than significant level.

Since certification of the 2007 EIR, the reunification of Courthouse Square has substantially altered the circulation system in the planning area and traffic patterns and volumes have changed. Additionally, the Proposed Plan is projected to result in a net increase of approximately 8,765 new residents, 3,750 new housing units, and 469,000 square feet of new non-residential uses in the planning through 2040 as compared to the 2007 DSASP, which would be expected to generate a substantial increase in the volume of traffic in the planning area. As such, additional analysis related to the potential for substantial temporary or permanent increases in ambient noise levels in the planning area is required in the SEIR.

Criterion 10b

The 2007 EIR determined that there would be less than significant impacts related to ground-borne vibration levels from railroad train operations under the 2007 EIR, given that the nearest residential buildings are likely to be proposed at a distance of at least 40 feet from the tracks, and further determined that vibration-related impacts to residents and businesses from construction activities under the 2007 would be minimized through compliance with existing regulations and less than significant. However, the 2007 EIR found that existing structures could be exposed to construction-related vibration during excavation and foundation work associated with development under the 2007 DSASP such that significant impacts would result. To address these impacts, the 2007 EIR includes Mitigation Measure NOI-3a, which requires the use of drilled piles instead of impact pile driving where possible and the avoidance of vibratory rollers and tampers near sensitive areas, as well as Mitigation Measure NOI-3b, which requires site-specific vibration studies to determine the area of impact and to present appropriate mitigation measures where project construction is anticipated to include vibration-generating activities. The 2007 EIR found that implementation of these mitigation measures would reduce associated impacts to a less than significant level.

Since certification of the 2007 EIR, SMART passenger rail service has begun, bringing approximately 17 round trips through the planning area on weekdays. However, vibration-related impacts from passenger rail operations are analyzed in the 2007 EIR with reference to the Sonoma-Marine Rail Transit Project EIR (SCH# 2002112033) and found to be less than significant because

there would be fewer than 30 events per day, and because ground-borne vibration levels would be below 0.01 inches per second rms vibration velocity (80 VdB re micro inch per second) at distances greater than 20 feet from the tracks and development where development would be permitted. Under the Proposed Plan, there would also be fewer than 30 events per day and development would be at least 40 feet from the tracks as with the 2007 DSASP, therefore associated impacts would also be less than significant, as with the 2007 EIR. Construction activities under the Proposed Plan would be similar in nature to those under the 2007 Plan and as such the potential for existing structures to be exposed to construction-related vibration during excavation and foundation work exists as under the 2007 DSASP. However, Mitigation Measures NOI-3a and NOI-3b would be also required under the Proposed Plan and would reduce impacts to a less than significant level, as with the 2007 EIR.

Criterion 10c

Given that the planning area is not located within the boundaries of an airport land use plan, within two miles of a public airport or public use airport, or within the vicinity of a private airstrip, the 2007 EIR determined that there would be no impacts related to aircraft noise. The nearest airport to the planning area is the Charles M Schulz-Sonoma County Airport, located approximately 8 miles to the northwest, and the nearest private's airstrip is the Sonoma Jet Center, located adjacent to the Charles M Schulz-Sonoma County Airport. Given the intervening distance and flight patterns, there would be no associated impacts from implementation of the Proposed Plan, as with the 2007 EIR.

Conclusion

Since certification of the 2007 EIR, the reunification of Courthouse Square has substantially altered the circulation system of the planning area and the Proposed Plan is projected to result in a net increase of approximately 8,675 new residents, 3,750 new housing units, and 513,120 square feet of new non-residential uses in the planning through 2040 as compared to the 2007 DSASP, which would be expected to generate a substantial increase in the volume of traffic. Therefore, implementation of the Proposed Plan could potentially result in new or substantially more adverse impacts than analyzed and mitigated in the 2007 EIR, and additional analysis of impacts related to the potential for substantial temporary or permanent increases in ambient noise levels in the planning area is required in the SEIR. However, as vibration-related impacts from the operation of SMART passenger rail service through the planning area was previously analyzed and found to be less than significant, and as Mitigation Measures NOI-3a and NOI-3b would be required under the Proposed Plan and would reduce construction period vibration impacts to a less than significant level, as with the 2007 EIR, no further analysis of excessive ground-borne vibration or ground-borne noise levels is required in the SEIR. Further, given the distance of the nearest airport from the planning areas and the prevailing flight patterns, as with the 2007 EIR, no impacts related to air traffic noise would result from implementation of the Proposed Plan and no further analysis of associated impacts is required in the SEIR.

PUBLIC SERVICES AND RECREATION

<p>Public Services and Recreation</p> <p>Would the project:</p>	<p>Where Impact Was Analyzed in 2007 DSASP FEIR</p>	<p>Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?</p>	<p>Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?</p>	<p>Any Substantially Important New Information Requiring New Analysis or Verification?</p>	<p>Do Plan FEIR Mitigation Measures Address/Resolve Impacts?</p>
<p>a. Have the potential to 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: fire protection, police protection, schools, parks, or other public facilities;</p>	<p>4.11-11 to 4.11-26</p>	<p>No</p>	<p>No</p>		<p>N/A</p>
<p>b. 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;</p>	<p>4.11-26 to 4.11-34</p>	<p>No</p>	<p>No</p>		<p>Yes</p>

Public Services and Recreation Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
c. Result in substantial adverse physical or other environmental impacts associated with the provision of new or physically altered park facilities, or need for new or physically altered park facilities, construction of which could cause significant environmental impacts; or	4.11-34 to 4.11-36	Yes	Yes		Further Analysis Required in SEIR

Criterion 11a

The 2007 EIR determined that the adoption and implementation of the 2007 DSASP would result in a less than significant impact related to provision of new or physically altered governmental facilities, including police, fire, library, schools, and parks.

POLICE

Buildout projections under the 2007 DSASP estimated an additional increase of 3,250 new residential units and 8,125 people, along with 494,000 square feet of non-residential square footage over the 20-year planning horizon. Given these estimations, the 2007 EIR determined 10 sworn personnel were needed to maintain or exceed the service ratio of 1.17 sworn employees per 1000 residents that existed at the time, but that the opening of a new sub-station in Courthouse Square would accommodate police facility needs for the foreseeable future.

Over the next 20 years, the Proposed Plan is expected to result in 16,800 new residents, 7,000 new housing units, and 828,485 additional square feet in non-residential uses in the planning area by 2040. This represents 3,750 more housing units; 8,675 people; and 513,120 additional square feet in non-residential uses than the 2007 DSASP. This increased service population would increase calls for police protection and law enforcement services. Assuming that the ratio of 0.99 sworn officers per thousand residents/employees is maintained in 2040, an additional 17 sworn officers would be

required, and additional marked patrol cars could be needed. Additional staff could be accommodated within existing police facilities.¹⁰ Therefore, as with the 2007 EIR impacts related to construction of new or expanded police facilities would be less than significant.

FIRE

Based on a population projection of 3,250 new residential units with an estimated population of 8,125 people, along with 494 square feet of about 198,000 square feet of office/public space and about 296,000 square feet of retail space, over the next 20 years, the 2007 EIR determined that the implementation of the Specific Plan would require the addition of another half company of fire fighters to be hired to maintain current performance levels and response times of 4 minutes to 80 percent of emergency calls, 5 minutes to 90 percent of emergency calls and 6 minutes or less to all emergency calls. At the time, SRFD served a population of approximately 158,000 and was staffed by 128 sworn employees, a service ratio of 0.81 staff/1,000 people. Although implementation of the 2007 DSASP required additional personnel, the expansion of personnel and improvement of existing facilities was part of an existing plan to increase demand in the community, and construction of another facility was determined to be unnecessary. Thus, the impact was considered less than significant.

As described above, over the next 20 years, the Proposed Plan is expected to result in 3,750 more housing units; 8,675 people; and 513,120 additional square feet in non-residential uses than the 2007 DSASP. Development under the Proposed Plan would be required to install sprinkler systems consistent with current fire code in order to minimize the risk of loss and damage; however, the anticipated growth in service population would increase calls for fire protection service. The current staff ratio is 0.7 career firefighters per thousand residents/employees. According to the SRFD, the downtown area is already the highest demand for calls for service based on population density. An additional operational response unit is already required downtown prior to assumed density growth potential, which will require 9 additional FTEs. There will also be the need for additional management (1 FTE) and an additional Fire Inspector (1 FTE). A downtown fire station is needed to replace the aging station on Sonoma Ave. as well as enhance response capabilities to the downtown area based on population density and high-rise risk assessment.

Further, the Proposed Plan would likely involve the construction of buildings over 10 stories tall in parts of the planning area. ISO standards call for a ladder truck within 2.5 miles of urban areas containing buildings three or more stories in height. Currently, Fire Station 1 and Fire Station 2 have ladder trucks. While new trucks could be required to adequately serve the increase in service population downtown, it is anticipated that these trucks could be accommodated within existing and previously planned facilities.

The fire department has existing plans to construct a new downtown fire station to replace the aging station on Sonoma Avenue and enhance response capabilities to the downtown area based on population density and high-rise risk assessment.¹¹ This new facility could accommodate the additional staff and equipment needed to serve the anticipated 2040 service population of the

¹⁰ Personal communication with Police Captain Ray Navarro, December 2019.

¹¹ Personal correspondence with Fire Chief Tony Gossner, December 2019.

planning area. Since an additional facility is already planned, as with the 2007 EIR impacts related to construction of new or expanded fire protection facilities would be less than significant.

SCHOOLS

The 2007 EIR determined that enrollment at Santa Rosa City Schools (SRCS) was expected to increase over the next decades, primarily at the middle school and elementary school levels. At the time, the Santa Rosa General Plan had identified several other elementary and middle school sites, most being three miles within the 2007 planning area. At a factor of 0.4 students per housing unit, the 2007 DSASP was projected to generate 1,300 students based on housing projection of 3,250 housing units. The already planned facilities outside of the planning area were determined to be adequate in meeting the population demand and would not result in need for new, unplanned facilities. Therefore, impacts related to new or expanded school facilities were found to be less than significant.

The Proposed Plan is expected to result in 3,750 more housing units and 8,675 more people as compared with the 2007 DSASP projections. According to the 2018 SRSC District Enrollment Projection Study, enrollment is projected to decrease at the elementary school level from 5,191 students in school year 2017/2018 to 5,120 students in school year 2027/2028. SRCS District's enrollment has decreased by 0.64 percent annually since school year 2000/2001.¹² The recently adjusted student generation rate used in the 2018 Study was 0.25 students per housing unit for multifamily attached units. Using this updated rate, it is estimated that 1,751 students would result of population growth as part of the Proposed Plan, an additional 451 students greater than the population considered as part of the 2007 DSASP. As shown in Table 1 below, based on enrollment, capacity, and projected enrollments for SRCS, there is adequate capacity to support student growth under the Proposed Plan.¹³ Therefore, impacts related to new or expanded school facilities from the Proposed Plan would be less than significant, as with the 2007 EIR.

Buildout Comparison, 2007 DSASP and Proposed Plan

<i>Grade Level</i>	<i>Enrollment (17/18)</i>	<i>Projection (2027/2028)</i>	<i>Capacity</i>
Elementary	5,151	5,120	6,376
Middle	3,176	2,865	3,629
High	7,787	7,263	7,855

Source: 2016 Facilities Master Plan, 2018 Enrollment Projection Study

LIBRARIES

The 2007 EIR cited Sonoma County Library's countywide service level standard of 0.55 to 0.63 square feet of library area per capita and, based on a projection of 3,250 new residential units with an estimated population of 8,125 people, the 2007 EIR determined that buildout associated with

¹² Cooperative Strategies. Santa Rosa City Schools Enrollment Projection Study, 2018. Accessed at <https://agendaonline.net/public/Meeting/Attachments/DisplayAttachment.aspx?AttachmentID=272969&IsArchive=>

¹³ Santa Rosa City Schools and Quattrocchi Kwok Architects. Santa Rosa City Schools Facilities Master Plan, 2016. Accessed at https://www.srcschools.org/cms/lib/CA02206835/Centricity/Domain/45/01_srcs_fmp_1.0_complete.pdf

the 2007 DSASP would decrease the service ratio to 0.54 (unit). However, the 2007 EIR noted plans to expand the Central Library Branch and found that this expansion would be sufficient to meet the need resulting from new population. As such, it was determined that implementation of the 2007 DSASP would not result in need for additional library facilities in excess of what was already planned and impacts were found to be less than significant.

Since the 2007 EIR was certified, Sonoma County Library has updated its facilities master plan. The 2016 Sonoma County Library Master Plan does not establish a service ratio, nor does it envision expansion of the Central Library, located in the planning area. However, according to correspondence, this service ratio is being updated for 2019. Planned improvements to the Central Library cited in the Master Plan include an interior and exterior refreshment, ADA compliance improvements, and replacement of building systems. Buildout of the Proposed Plan is projected to add 16,800 new residents and 7,000 new housing units, a net increase of 3,750 housing units and 8,675 people over 2007 DSASP projections. This would increase the use of library facilities; however, the Library does not anticipate that expansion of existing facilities or construction of new ones would be required to serve the projected 2040 population under the Proposed Plan.¹⁴

While redevelopment of the Central Library is not directly proposed or funded under the Proposed Plan, the Proposed Plan identifies the Central Library as a catalyst site and Proposed Plan policies and regulations would seek to promote redevelopment of numerous government facilities over the next 20 years, including the Central Library. The potential environmental impacts that could result from construction and operation of redeveloped government facilities were analyzed and mitigated in the 2007 EIR. Additionally, new and substantially more adverse impacts from the Proposed Plan over and above those evaluated in the 2007 EIR, including impacts related to air quality, GHG emissions, noise, and traffic, will be analyzed at a programmatic level in the SEIR. Therefore overall, given that the Proposed Plan would not require the construction of library or other government facilities, impacts would be less than significant as with the 2007 DSASP.

Criteria 11b, 11c

The 2007 EIR determined that the impact of the adoption and implementation of the DSASP on the quality of park facilities or requirement of construction or expansion of recreational facilities and any associated environmental impacts would be less than significant, as construction of new recreational activities and compliance with policies and regulations would meet the needs of an increased population. Based on the expected growth of 3,250 new residential units and additional 8,125 people, an additional 48 acres of neighborhood and community parkland, school recreational land, and open space were determined to be needed to maintain current park standard of 6 acres per 1,000 residents. The 2007 DSASP included development of 4.5 acres within the planning area, and the remainder of the 48 acres of parks and open space was expected to be developed outside of the planning area using fees generated by the Quimby Act and the Park Development Fees ordinance.

The General Plan describes several different types of parks: neighborhood parks, community parks, special purpose parks, and public plazas and gathering places. Neighborhood parks are generally

¹⁴ Personal Correspondence with Ray Holley, Community Relations Manager of Sonoma County Libraries, December 2019.

two to ten acres and are intended to serve the recreation needs of people living or working within one-half mile radius of the park. Community parks are larger scale (10-25 acres in size) and provide recreation opportunities beyond those supplied by neighborhood parks. The city aims to provide access to community parks within one mile of residential neighborhoods. Special purpose parks are generally designated for single use such as golf courses, heritage museums, botanical gardens, and environmental interpretive experiences. These facilities are used by residents throughout the city. Public plazas and gathering places are not included in park acreage but have an important role in connecting residents and visitors to the wider network of parks, creek trails, and bike and pedestrian pathways.

The city maintains a park standard of six acres of parkland per 1,000 residents. The standard is broken down into separate ratios for city parks, school recreational land, and open space as determined by City Council resolution. Currently, the city's standard includes 3.5 acres of city parks (neighborhood, community, citywide and special purpose parks and facilities) per 1,000 residents, plus 1.4 acres of publicly accessible school recreational land and 1.1 acres of public-serving open space.

In 2019, the planning area had approximately 22 acres of public parks and civic areas, consisting of 17.9 acres of neighborhood parks, 1.5 acres of special purpose parks, 2.0 acres of trail parks, and 0.5 acres of civic areas. Based on a total population of 5,868, the planning area parkland standard was approximately 3.75 acres per 1,000 people, which is lower than the total parkland standard of six acres per 1,000 people.

The Proposed Plan is expected to generate 7,000 new housing units and 16,800 people, a net increase of 8,675 people and 3,750 housing units over 2007 DSASP projections. This additional population could accelerate degradation of existing parks. Subsequent to the 2007 DSASP, the 2009 Santa Rosa Recreation and Parks Business and Strategic Action Plan applies the standard of six acres of parkland per 1,000 residents to all development projects to ensure park service allocation are ratios are met. To meet the total parkland ratio standard of six acres per 1,000 people, the Proposed Plan would need to add an additional 52 acres over the 48 acres of total parkland need anticipated in the 2007 DSASP. To meet the city parkland service ratio standard of 3.5 acres/1,000 people, an additional 36.8 acres of neighborhood and community parks would be needed over the 28.4 acres of city parkland need as part of the 2007 DSASP.

The Proposed Plan includes new urban parks/civic spaces in areas that will see new and intensified residential development. These parks correspond to locations identified in the 2035 General Plan for park development. The Proposed Plan would provide at least 4.5 acres of new parkland in the planning area, including new parks at Imwalle Gardens and Maxwell Court, and an expansion of Depot Park in Railroad Square. The Proposed Plan would create a new park type consistent with a neighborhood parks definition that allows and promotes entertainment and activities in flexible, publicly accessible spaces and urban parks. Consistent with the 2007 DSASP, the Proposed Plan would use mitigation measures related to new construction to reduce environmental impacts to less than significant levels.

Similar to findings in the 2007 DSASP, the remainder of the necessary parkland would likely need be developed outside of the planning area since the area is mostly developed. Subsequent to the 2007 DSASP, the City has amended the Park Development Fee ordinance to reduce fees levied on

development over three stories in the planning area for a period of five years. While Quimby Act fees and Park Development Fees may have been sufficient to generate funds for construction of new parks and rehabilitation of existing parks at the time of the 2007 DSASP, this potential reduction in fees may result in consequent acceleration of substantial deterioration beyond impacts analyzed in the 2007 EIR. Thus, analysis is required in the SEIR.

Conclusion

Based on an examination of the analysis, findings, and conclusions of the 2007 EIR, implementation of the Proposed Plan would not substantially increase the severity of any impacts identified related to construction of new fire, police, library, or school facilities. While the Proposed Plan would result in an increase in population which could necessitate additional city services staffing, CEQA standards of significance focus on evaluation of impacts on the physical effects of constructing or altering public facilities, not necessarily staffing levels. Environmental conditions have changed such that a new fire facility is needed to replace the aging Sonoma Avenue facility, but this is planned to occur regardless of Proposed Plan implementation, and the facility would be adequate to meet additional needs generated by the Proposed Plan. Construction of additional planned parks would be required to comply with relevant mitigation measures for site grading, erosion, and stormwater control.

The population increase associated with implementation of the Proposed Plan results in a total parkland standard below the city standard of 6 acres per 1,000 people and has the potential to accelerate degradation of existing parks over impacts analyzed in the 2007. Subsequent to the 2007 DSASP, the City has reduced park fees for downtown development, and while this fee change is only applicable for five years, it represents a change in circumstance which could impact the City's capacity to develop new parks and maintain existing parks. Thus, additional analysis is required in the SEIR.

TRAFFIC AND TRANSPORTATION

Traffic and Transportation Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
a. Conflict with applicable plan, ordinance or policy establishing measures of the circulation system, including transit, roadway, pedestrian and bicycle facilities;	4.12-62-4.12-66	Yes	Yes	Yes	Further analysis required in SEIR
b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b), which requires the use of vehicle miles travelled (VMT) for determining the significance of traffic impacts;	Not addressed	Yes	Yes	Yes	Further analysis required in SEIR
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);	Not addressed	No	No	No	N/A
d. Result in adequate emergency access	Not addressed	No	No	No	No

Criterion 12a

The 2007 EIR evaluated impacts to the circulation system in terms of intersection and corridor level of service (LOS), a measure used for analyzing the performance of intersections and roadway segments based on vehicle speed, density, or congestion. The 2007 EIR determined that implementation of the 2007 DSASP could potentially result significant impacts at seven intersections and four corridors in the planning area, but that roadway improvements proposed in the 2007 DSASP would reduce these impacts to a less than significant level. The 2007 EIR also determined that traffic associated with the 2007 DSASP would contribute to LOS F operating conditions on segments of US 101 within the City of Santa Rosa, as well as LOS E conditions on Highway 12 and that the corresponding volume-to-capacity ratios would increase by greater than 0.01 on both freeways, representing a significant impact. However, as there were no known freeway capacity improvement projects that could result in acceptable operations in the future, and correspondingly no means for collection of fair-share payments from development under the 2007 DSASP to fund these improvements, the 2007 EIR determined that impacts to freeway segment LOS would remain significant and unavoidable.

Since certification of the 2007 EIR, the linkage of Mendocino Avenue and Santa Rosa Avenue between Third and Fourth Streets was closed in order to reunify Courthouse Square. This represents a substantial change to the traffic network in the planning area. Further, the Proposed Plan would result in a net increase of approximately 8,675 new residents, 3,750 new housing units, and 513,120 square feet of new non-residential uses in the planning through 2040 as compared to the 2007 DSASP, which would be expected to generate a substantial increase in the volume of traffic in the planning area that could result in new or substantially more adverse impacts than analyzed and mitigated in the 2007 EIR. Therefore, additional analysis with respect to the operation of the circulation system and conflicts with adopted ordinances and policies addressing the circulation system will be required.

Criterion 12b

In 2013, the California State Legislature passed Senate Bill (SB) 743, committing the State to changing the way that transportation impacts are analyzed under CEQA. Traditionally, one of the key metrics by which transportation impacts have been evaluated is vehicle level of service (LOS), a measure used for analyzing the performance of roadway segments and intersections based on vehicle speed, density, or congestion. However, better vehicle LOS is not necessarily consistent with other environmental objectives, such as improved air quality, reduced GHG emissions, or reduced traffic noise. As such, SB 743 required the State to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts such that auto delay would no longer be considered a significant environmental impact. Pursuant to SB 743, new CEQA Guidelines were adopted by the State in December 2018 that established VMT as the metric to be used for evaluating traffic impacts under CEQA, effective July 1, 2020. The Governor's Office of Planning and Research has issued technical recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures.

In 2019, the State of California amended its CEQA Guidelines to require the analysis of VMT for determining the significance of traffic impacts. This represents a change in circumstances that

could potentially result in new impacts not previously identified in the 2007 EIR. Therefore, additional analysis related to VMT and traffic impacts is required in the SEIR.

Criteria 12c and 12d

The 2007 EIR determined that implementation of the 2007 DSASP would result in less than significant impacts related to roadway hazards, including hazards due to design features, incompatible uses, and inadequate emergency access. The 2007 EIR noted that future development would be subject to existing City policy and regulations, including the City of Santa Rosa Design and Construction Standards, which contain roadway design criteria and specifications. Additionally, the 2007 EIR noted that continued use of the existing OPTICOM system, which allows emergency vehicles to preempt traffic signals, would facilitate emergency response times. As such, the 2007 EIR found that compliance with existing City policy and regulations would ensure that impacts related to roadway hazards would be less than significant. As with the 2007 DSASP, future development under the Proposed Plan would also be subject to existing City policy and regulations and operation of the OPTICOM system would continue. As such, impacts related to roadway hazards would be reduced to the maximum extent practicable and would be less than significant, as with the 2007 DSASP.

Conclusion

Since certification of the 2007 EIR, the reunification of Courthouse Square has substantially altered the circulation system of the planning area and the State has adopted new CEQA Guidelines requiring the analysis of VMT for determining the significance of traffic impacts. Further, the Proposed Plan is projected to result in a net increase of approximately 8,675 new residents, 3,750 new housing units, and 513,120 square feet of new non-residential uses in the planning through 2040 as compared to the 2007 DSASP, which would be expected to generate a substantial increase in the volume of traffic in the planning area. Therefore, implementation of the Proposed Plan could potentially result in new or substantially more adverse impacts than analyzed and mitigated in the 2007 EIR, and additional analysis of impacts related to the operation of the circulation system, conflicts with adopted ordinances and policies addressing the circulation system, and VMT is required in the SEIR. However, as future development under the Proposed Plan would be subject to existing City policy and regulations and operation of the OPTICOM system would continue as under the 2007 DSASP, impacts related to roadway hazards would be less than significant as with the 2007 DSASP and no further analysis would be required in the SEIR, including analysis related to roadway hazards, including hazards due to design features, incompatible uses, and inadequate emergency access.

ENERGY, GREENHOUSE GASES, AND CLIMATE CHANGE

Energy, Greenhouse Gases, and Climate Change Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation;	6-4	Yes	Yes		Additional analysis required in SEIR
b. Generate Conflict with or obstruct a state or local plan for renewable energy or energy efficiency;	Not addressed.	Yes	Yes		Additional analysis required in SEIR
c. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or	Not addressed.	Yes	Yes		Additional analysis required in SEIR
d. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Not addressed	Yes	Yes		Additional analysis required in SEIR

Criterion 13a, 13b

The 2007 EIR did not determine the level of significance of impacts as result of adoption and implementation on energy usage; however, it was noted that subsequent development and land use changes under the Specific Plan would constitute a long-term commitment to these more energy-intensive land uses. Renewable, nonrenewable, and limited resources that would likely be consumed as part of the development of the proposed Specific Plan would include, but are not limited to, oil, gasoline, lumber, sand and gravel, asphalt, water, steel, and similar materials, representing an irretrievable commitment of building materials and energy to the construction and maintenance of buildings and infrastructure.

Given that the Proposed Plan would result in land use intensification and an increase in service population of 8,675 over 2007 DSASP projected populations, total levels of energy usage from construction and maintenance of buildings and infrastructure resulting from the Proposed Plan

would be greater than under the 2007 DSASP. As such, additional analysis is required in the SEIR to quantify energy usage than can be expected from implementation of the Proposed Plan.

Appendix F of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR) include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of nonrenewable energy in order to assure energy implications are considered in project decisions. Additionally, Executive Order S-21-09 and the Renewable Portfolio Standard (RPS), SB X1-2, and SB 350 set new standards for renewable energy. These new standards and requirements, among others, represents a change in circumstances, and analysis for consistency with these plans is required in the SEIR.

Criteria 13c, 13d

Implementation of the Proposed Plan would generate direct and indirect GHG emissions. Sources of direct emissions would include mobile vehicle trips, natural gas combustion, and landscaping activities. Indirect emissions would be generated by electricity consumption, waste and wastewater generation, and water use. While greenhouse gas emissions were not evaluated in the 2007 EIR, the Proposed Plan would result in land use intensification, an additional 3,750 housing units, and an additional population of 8,675 over the population projected in the 2007 DSASP. These impacts could be expected to generate a substantial increase in the volume of greenhouse gas emissions that could result in new or substantially more adverse impacts; thus, further analysis is required in the SEIR.

Subsequent to the certification of the 2007 EIR, the State of California amended its CEQA Guidelines to require the analysis of greenhouse gas (GHG) emissions. This represents a change in circumstances that could potentially result in new impacts not previously identified in the 2007 EIR. Therefore, additional analysis related to the generation of GHG emissions and conflicts with plans, policies, and regulations adopted for the purpose of reducing GHG emissions is required in the SEIR.

Conclusion

Since certification of the 2007 EIR, the State has adopted new CEQA Guidelines requiring the analysis of energy usage and GHG emissions for determining the significance of traffic impacts. Further, the Proposed Plan is projected to result in a net increase of approximately 8,675 new residents, 3,750 new housing units, and 513,120 square feet of new non-residential uses in the planning through 2040 as compared to the 2007 DSASP, which would be expected to generate a substantial increase in energy usage and greenhouse gas emissions. Therefore, implementation of the Proposed Plan could potentially result in new or substantially more adverse impacts than analyzed in the 2007 EIR, and additional analysis of impacts related to energy usage and GHG emissions, conflicts with relevant adopted state and local ordinances and policies addressing these topics is required in the SEIR.

UTILITIES AND SERVICE SYSTEMS

<p>Utilities and Service Systems</p> <p>Would the project:</p>	<p>Where Impact Was Analyzed in 2007 DSASP FEIR</p>	<p>Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?</p>	<p>Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?</p>	<p>Any Substantially Important New Information Requiring New Analysis or Verification?</p>	<p>Do Plan FEIR Mitigation Measures Address/Resolve Impacts?</p>
<p>a. 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?;</p>	<p>4.13-10 to 4.13-12; 4.13-23</p> <p>Electric power, natural gas, and telecommunications not addressed</p>	<p>Yes</p>	<p>No</p>		<p>Additional analysis required in SEIR</p>
<p>b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;</p>	<p>4.13-12</p>	<p>Yes</p>	<p>No</p>		<p>Additional analysis required in SEIR</p>
<p>c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the</p>	<p>4.13-21</p>	<p>No</p>	<p>No</p>		<p>N/A</p>

Utilities and Service Systems Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
provider's existing commitments;					
d. Generate solid waste that exceed the permitted capacity serving the Planning Area; or	4.13-35	No	No		N/A
e. Comply with federal, State, and local statues and regulations related to solid waste.	4.13-37	No	No		N/A

Criterion 14a

The 2007 EIR determined that adoption and implementation of the DSASP would have a less than significant impact regarding construction of new or expanded water, wastewater treatment, and stormwater drainage facilities. Impacts to new construction electric power, natural gas, or telecommunications facilities were not analyzed as part of the EIR, the DSASP notes that off-site telecommunications improvements would be performed by AT&T. Cable improvements would fall to developers, who would responsible for trenching to the closest cable facility. For gas and electric services, individual developments will be responsible for upgrades which solely benefit that development, while upgrades to common facilities with multiple customers would be implemented by PG&E.

Proposed Plan is projected to result in a net increase of approximately 8,675 new residents, 3,750 new housing units, and 513,120 square feet of new non-residential uses over projections as compared to the 2007 DSASP. This increase in anticipated growth could potentially result in new

impacts not previously identified in the 2007 EIR. Therefore, additional analysis related to additional gas, electric, and telecommunications facilities is required in the SEIR.

This anticipated increase in service population under the Proposed Plan could have additional impacts to water storage and conveyance, as well as stormwater conveyance. Therefore, additional analysis related to the impacts on water and wastewater conveyance capacities is required in the SEIR.

Criterion 14b

The 2007 EIR determined that the adoption and implementation of the DSASP would have a less than significant impact to relocation or expansion of wastewater services and water supply. The 2007 EIR was supplemented by a Water Supply Assessment, which calculated water demand determined by using residential equivalency factors (REFs) consistent with the land use classifications of General Plan and zoning code, and with those set forth in SB 610. It was determined that a projected increase of 3,250 housing units over the 20-year period of the Specific Plan would result in a maximum of 975 acre-feet per year (AFY) and that the city currently had adequate supply to meet existing demands and planned future demands plus the maximum anticipated demand associated with the Specific Plan.

The Proposed Plan is projected to add 7,000 residential units, a net increase of 3,750 housing units over the 2007 buildout assumptions. Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects (as defined in Water Code 10912 [a]) subject to the CEQA. This includes projects that result in an addition of 500 housing units. Given that the Proposed Project increases housing units over the 500-unit threshold, the Proposed Plan requires further analysis as part of a new Water Supply Assessment and additional analysis in the SEIR.

Criterion 14c

The 2007 EIR determined that the adoption and implementation of the DSASP would have a less than significant impact regarding wastewater capacity. Based on 2007 DSASP buildout projections of 3,250 housing units and 493,800 square feet of non-residential development, implementation was expected to result in a maximum of 1.4 mdg ADWG at buildout over the planning horizon, in excess of the 25.9 mdg ADWF planned for based on the existing General Plan. This estimate was considered conservative, using an estimated 3.25 people per household.

Sewage generated from residential, commercial, and industrial uses in Santa Rosa is collected and transported to the Laguna Wastewater Treatment Plant (WTP), located southwest of the city on Llano Road. The Laguna WTP, managed by the City of Santa Rosa, provides wastewater treatment and disposal services for the city as well as for Rohnert Park, Cotati, Sebastopol, and the South Park Sanitation District. At the time, the Laguna Wastewater Treatment Plant operated with an ADWF of 16.4 mgd, with the city of Santa Rosa contributing roughly 12.4 mgd. and regulatory compliance of the Laguna Wastewater Treatment Plant. General Plan growth projections anticipated an increase in Santa Rosa's ADWF to 18.8 mdg by the year 2020. However, it was expected that improvements would expand capacity to up to 25.9 mgd to meet future 2020 demand.

Since the time of the 2007 EIR, the Laguna WTP average daily dry weather flow is 15.5 mgd and is permitted for 21.34 mgd average daily dry weather flow, an excess capacity of 5.84 mgd. It is estimated that projects under Santa Rosa's Subregional Water Reuse System Incremental Recycled Water Program, which was originally undertaken in 2001, will be implemented as growth occurs, eventually increasing the plant's capacity to 25.79 mgd, 18.25 mgd of which would be allocated to Santa Rosa.

Buildout under the proposed plan is estimated to include 7,000 housing units; an increase in population of 16,800; and an additional 2,987 jobs. According to the City's (2014a) Sanitary Sewer System Master Plan Update, wastewater would be generated at an approximate rate of 50 gallons per capita per day (gpcd) for residential uses and 30 gpcd for nonresidential uses. Using these assumptions in Table 3 below, the Proposed Plan's planned development compared to existing conditions would generate an additional 929,610 gpd (0.93 mgd) of wastewater. This represents about 16 percent of the LWTP's excess capacity.

However, development of the planning area has already been considered in terms of generating wastewater in the City's General Plan 2035 and the 2014 Sanitary Sewer System Master Plan Update. The Proposed Plan's actual change in wastewater generation is based on the changed land uses in the Planning Area, a net increase of 513,120 square feet of non-residential uses, and 3,750 housing units. Based on this assumption, the Proposed Plan is projected to generate approximately 475,690 gpd (0.48 mgd) more wastewater than assumed in the General Plan EIR, as shown in Table 4 below. This represents 8.2 percent of the Laguna WTP's excess capacity.

Criterion 14d

The 2007 EIR determined that the adoption and implementation of the DSASP would result in a less than significant impact related to solid waste capacity and disposal. At the time, the North Bay Corporation was the local solid waste service provider under contract for hauling of solid waste, yardware, and recyclable materials to landfills under the jurisdictional boundary of the Sonoma County Waste Management Agency (SCWMA), the Regional agency that provided solid waste disposal. While the Central Disposal Facility was the primary landfill in Sonoma County, SCWMA worked out contract agreements with four landfill sites in adjacent counties to meet foreseeable growth in the County through August 2010, at which point they would negotiate new contracts based on future capacity needs.

Table 3. Increase in Wastewater Generated (vs. General Plan 2035)

	Units/Sq Ft	Population Generated	Wastewater Generation Rate (GPCD)	Projected Wastewater Volume (gpd)
Residential Development	7,000	16,800	50	840,000
Nonresidential Development	828,485 ¹	2,987	30	89,610
TOTAL				929,610

¹ Uses jobs density assumptions of 300 s.f./job for office; 300 s.f./job for services; 400 s.f./job for retail; and 600 s.f./job for industrial.

Source: City of Santa Rosa, 2014

Table 4. Increase in Wastewater Generated (vs. General Plan 2035)

	Units/Sq Ft	Population Generated	Wastewater Generation Rate (GPCD)	Projected Wastewater Volume (gpd)
Residential Development	3,750	8,675	50	433,750
Nonresidential Development	513,120	1,398 ²	30	41,940
TOTAL				475,690

¹ Uses jobs density assumptions of 300 s.f./job for office; 300 s.f./job for services; 400 s.f./job for retail; and 600 s.f./job for industrial.

²2007 DSASP job projections = 1,399.

Source: City of Santa Rosa, 2014

The 2007 EIR anticipated implementation of the Specific Plan would contribute an additional 3,800 tons of solid waste, based on a projected increase of roughly 8,125 new residents¹⁵ and 2006 waste tonnage trends of 0.468 tons of solid waste per capita each year, but the increase in solid waste would be reduced through current and expanded waste recycling efforts and would not exceed the disposal capacity limits of SCWMA.

Since the time of the 2007 EIR, the Central Disposal Facility has a maximum permitted daily throughput for the solid waste facility of 2,500 tons per day, an estimated remaining capacity of 9,076,76 cubic yards, and an estimated closure of 2034. A contingency landfill, the Keller Canyon Landfill, is located in Pittsburgh, California.

According to the City's Zero Waste Master Plan, Santa Rosa had a disposal rate of 4.8 pounds of landfilled material per person per day in 2018, a rate of 0.876 tons per year. Under the Proposed Plan, projected buildout is estimated to add 7,000 housing units and 16,800 people, a net increase of 3,750 housing units and 8,675 people over the 2007 DSASP. Using revised tonnage estimates, the population would result in approximately 14,729 tons of solid waste per year over 2007 DSASP levels. The increase in solid waste anticipated to be generated by the Proposed Plan represents approximately 1.6 percent of the facility's yearly permitted throughput. Therefore, the proposed project would not exceed the landfill's permitted capacity or require its expansion.

In 2017, the City conducted a competitive procurement process to select a new hauler for garbage, recycling, and organics collection, and awarded Recology Sonoma Marin (Recology) an exclusive franchise agreement for provision of these services within the City. Part of the agreement specifies diversion requirements that are required to be met based on franchised waste. These goals are also enumerated in the City's 2019 Zero Waste Master Plan.

State legislation also reduces impacts of waste. Assembly Bills (AB) 341 and AB 1826 foster further growth in recycling and organics composting and new laws SB 1383 and AB 1884 have increasingly stringent goals around the diversion of food waste and reduction of single-use plastics.

The City's 2019 Zero Waste Master Plan also sets a new goal to reduce landfill disposal to less than one (1) pound per person per day of franchised waste and achieve at least 75% diversion of franchised waste from landfill disposal by 2030. Programs and policies in this plan to further divert waste include a single-use plastics ban; mandatory participation in recycling and composting programs; a Construction and Demolition (C&D) Ordinance Update, targeted technical assistance and education, and a Zero Waste culture change, which includes zero waste event requirements, among other programs.

Compliance with these existing regulations would further reduce solid waste generated by the proposed project. Therefore, the Proposed Plan would have a less than significant impact related to solid waste capacity and disposal.

¹⁵ Projections assumed an average household size of 2.5 anticipated for Santa Rosa in 2020.

Criterion 14e

The 2007 EIR determined that the adoption and implementation of the DSASP would result in a less than significant impact related to compliance with solid waste statutes and regulations, as it would comply with applicable local, regional and State solid waste regulations and policies. These include Santa Rosa General Plan Policies PSF-H-3 and PSF-H-4d that establish and actively encourage residential and non-residential recycling Programs, Santa Rosa's Construction and Demolition Debris Franchise Agreement, The California Solid Waste Reuse and Recycling Access ordinance, AB 939 diversion requirements and Chapter 22 of the County Code (Section 22-7A).

As with the 2007 DSASP, development under the Proposed Plan would be required to comply with applicable local, regional and State solid waste regulations and policies. Several new state laws have passed since the time of analysis of the 2007 EIR, including AB 341- Mandatory Commercial Recycling, AB 1826- Mandatory Commercial Organics Recycling, and AB 1884- Bans on Single-Use Plastic Straws. The City is also working to prepare for anticipated impacts of SB 1383- Short-Lived Climate Pollutants and has also developed a new Zero Waste Master Plan, which establishes goals and policies for diversion requirements and franchised disposal. The City has also enacted new City Ordinances, such as Chapter 9-12, which allows the City to implement and fund curbside pickup of organic waste. Other local policies and ordinances include adoption of Green Building Standards, and development of the 2012 Climate Action Plan.

Similar to the 2007 DSASP, the Proposed Plan would adhere to any existing or new applicable local, regional, and state solid waste regulations and policies and thus would not result in a significant impact.

Conclusion

The Proposed Plan would result in 3,750 more housing units, 8,675 more residents, and 513,120 square feet of non-residential land than anticipated in the 2007 EIR, and as such, the utilities service population and impacts resulting from the Proposed Plan would be greater than under the 2007 DSASP. This includes impacts to water demand and capacity, water and wastewater conveyance, and franchised utilities such as telecommunications, natural gas, and electricity. The Proposed Plan's impacts on wastewater capacity and solid waste is not anticipated to be greater than impacts analyzed under the 2007 EIR. However, changes associated with the Proposed Plan are of sufficient scale and scope that new or substantially more adverse impacts related to utilities could result. Therefore, additional analysis is required in the SEIR.

MANDATORY FINDINGS OF SIGNIFICANCE

Mandatory Findings of Significance Would the project:	Where Impact Was Analyzed in 2007 DSASP FEIR	Do Proposed Changes Involve New or Substantially More Severe Significant Impacts?	Do Any New Circumstances Involve New or Substantially More Severe Significant Impacts?	Any Substantially Important New Information Requiring New Analysis or Verification?	Do Plan FEIR Mitigation Measures Address/Resolve Impacts?
a. Have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory;	Not addressed	Yes	Yes		Additional analysis required in SEIR
b. Have impacts which are individually limited, but cumulatively considerable; or	No addressed	Yes	Yes		Additional analysis required in SEIR
c. Have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly.	Not addressed	Yes	Yes		Additional analysis required in SEIR

Criterion 15a.

CEQA Guidelines Section 15065(a)(1) states that a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to (1) substantially reduce the habitat of a fish or wildlife species; (2) cause a fish or wildlife population to drop below self-sustaining levels; or (3) substantially reduce the number or restrict the range of an endangered, rare, or threatened species. CEQA Guidelines Section 4.3 (Biological Resources) of the EIR fully addresses any impacts that might relate to the reduction of the fish or wildlife habitat, the reduction of fish or wildlife populations, and the reduction or restriction of the range of special-status species as a result of project implementation. Additionally, CEQA Guidelines Section 15065(a)(1) states that a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to eliminate important examples of a major period of California history or prehistory.

As described above, the Proposed Plan would not result in new or substantially more adverse impacts related to biological resources, including fish and wildlife populations and threatened or endangered plant or animal species if 2007 DSASP mitigation measures are required. Similarly, as described above, the Proposed Plan would not result in new or substantially more adverse impacts related to paleontological resources. Therefore no further analysis of these topics is required in the SEIR. However, as described above, changes in circumstances since 2007 mean that new or substantially more adverse impacts related to archaeological and historic resources could result from implementation of the Proposed Plan and additional analysis is required in the SEIR in order to determine if the Proposed Plan will have a significant effect on the environment.

Criterion 15b.

CEQA Guidelines Section 15065 states that a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects that are individually limited but cumulatively considerable. As defined in CEQA Guidelines Section 15065(a)(3), cumulatively considerable means “that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” Impacts related to air quality, GHG emissions, noise, and traffic are cumulative in nature. As described above, the Proposed Plan could potentially result in new or substantially more adverse impacts related to air quality, GHG emissions, temporary and permanent increases in ambient noise levels, and the operation of the circulation system. Analysis of these impacts is required in the SEIR in order to determine if the Proposed Plan will have a significant effect on the environment.

Criterion 15c.

As required by CEQA Guidelines Section 15065(a)(4), a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes

to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, recreation, transportation/traffic, utilities, and climate change, which are addressed in prior sections of this IS.

As described above, implementation of the Proposed Plan would not result in new or substantially more adverse impacts related to geology and soils, hazards or hazardous materials, population and housing, and public services and recreation as compared to the 2007 DSASP and additional analysis is not required in the SEIR. However, implementation of the Proposed Plan, including increased construction and land intensification and increase in population could result in potentially more severe impacts to human health in the areas of air quality; hydrology and water quality; noise transportation and traffic; GHG emissions, energy, and climate change; and utilities. Analysis of the potential impacts of each of these areas is thus required in the SEIR in order to determine if the Proposed Plan will have a significant effect on the environment.

References

Santa Rosa Downtown Station Area Specific Plan Final Environmental Impact Report (SCH# #2006072104). City of Santa Rosa. 2007.

List of Preparers

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Appendix: 2007 DSASP Mitigation Measures

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
AESTHETICS			
Impact AES-1: Development of multi-story buildings along the Highway 101 and Highway 12 corridors could result in new sources of glare for vehicles traveling along these highways. This would be a <i>significant</i> impact.	S	<u>Mitigation Measure AES-1:</u> For construction of structures along the designated Scenic Highways 12 and 101, the City shall require the use of building materials designed to reduce lighting glare. Examples of these types of materials include, but are not limited to, windows treated with glare reductive coating or film covering, matte-finish tiles, marble, or sheet metal and non-reflective flashing material.	LTS
AIR QUALITY			
Impact AQ-1: Construction activity during development within the Specific Plan Area would generate air pollutant emissions that could expose sensitive receptors to substantial pollutant concentrations. This is a <i>significant</i> impact.	S	<u>Mitigation Measure AQ-1:</u> Implement control measures for construction and demolition-related air emissions to ensure that each project sponsor and contractor reduces particulate, ROG and NO _x emissions by complying with the BAAQMD policies and guidelines. Each project sponsor and contractor shall implement the following control measures: <ul style="list-style-type: none"> ◆ Provide transit information kiosks. ◆ Cover all trucks hauling construction and demolition debris from the site. ◆ Water on a continuous as-needed basis all earth surfaces during clearing, grading, earthmoving and other site preparation activities. ◆ Use watering to control dust generation during demolition of structures or break-up of pavement. 	LTS

LTS = Less Than Significant; S = Significant; SU = Significant Unavoidable Impact

TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
AQ-1 <i>continued</i>		<ul style="list-style-type: none"> ◆ Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved parking areas and staging areas. ◆ Sweep daily (with water sweepers) all paved areas and staging areas. ◆ Provide daily clean up of mud and dirt carried onto paved streets from the site. ◆ Renovation, demolition activities, removal or disturbances of any material that contain asbestos, lead paint or other hazardous pollutants will be conducted in accordance with BAAQMD rules and regulations. ◆ Properly maintain all construction equipment. ◆ Reduce equipment idling time. <p>For construction near sensitive receptors:</p> <ul style="list-style-type: none"> ◆ Install wheel washers for all exiting trucks, or wash off the tires or tracks of trucks and equipment leaving the site. ◆ Suspend dust-producing activities during periods when instantaneous gusts exceed 25 mph when dust control measures are unable to avoid visible plumes. ◆ Limit the area subject to excavation, grading and other construction or demolition activity at any one time. <p>For sites greater than 4 acres:</p> <ul style="list-style-type: none"> ◆ Apply soil stabilizers to previously graded portions of the site inactive for more than ten days, or cover or seed these areas. 	

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
AQ-1 <i>continued</i>		<ul style="list-style-type: none"> ◆ Water or cover stockpiles of debris, soil, sand, or other materials that can be blown by the wind. ◆ Limit traffic speeds on unpaved roads to 15 mph. ◆ Replant vegetation in disturbed areas as quickly as possible. 	
Impact AQ-2: The Downtown Station Area Specific Plan would contribute to increased vehicular and residential area emissions that would exceed BAAQMD thresholds. This is a <i>significant</i> impact.	S	<p><u>Mitigation Measure AQ-2:</u> Developers shall implement emissions control measures, where applicable, to development activities within the Specific Plan Area in order to reduce overall emissions from traffic and area sources. The emissions control measures could include the following:</p> <ul style="list-style-type: none"> ◆ Where practical, future development proposals shall include physical improvements, such as sidewalk improvements, landscaping and the installation of bus shelters and bicycle parking, that would act as incentives for pedestrian, bicycle and transit modes of travel. ◆ New or modified roadways should include bicycle lanes where reasonable and feasible. ◆ Provide transit information kiosks. ◆ Where practical, employment-intensive development proposals (i.e. office and retail) shall include measures to encourage use of public transit, ridesharing, van pooling, use of bicycles and walking, as well as to minimize single passenger motor vehicle use. ◆ Offices or retail uses that have 50 or more employees and provide parking should implement a parking cash-out program (where non-driving employees receive transportation allowance equivalent to the value of subsidized parking). 	SU

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
AQ-2 <i>continued</i>		<ul style="list-style-type: none"> ◆ Develop parking enforcement and fee strategies that encourage alternative modes of transportation. ◆ Parking lots or facilities should provide preferential parking for electric or alternatively fueled vehicles. ◆ Require energy efficient building designs that exceed State Title 24 building code requirements. ◆ Discourage use of gasoline-powered landscape equipment. ◆ Implement and enforce truck idling restrictions of three minutes. ◆ Only allow low-emitting fireplaces for residential uses, such as those that only burn natural gas. 	LTS
Impact AQ-3: The development of new residences within the Specific Plan Area could expose sensitive receptors to unhealthy levels of TACs emitted by traffic on Highway 101. This would be a <i>significant</i> impact.	S	<u>Mitigation Measure AQ-3:</u> Buffers for emission sources and sensitive land uses shall be required for residential uses proposed within 170 feet of the freeway and shall undergo detailed analysis to identify site specific health risks associated with DPM emitted from Highway 101. These buffers shall provide appropriate buffers between potential air pollution and odor impacts from land uses that may emit pollution and/or odors when locating (a) air pollution sources, and (b) residential and other pollution-sensitive land users in the vicinity of air pollution sources which may include freeways, gasoline fueling stations and dry cleaning operations that use solvents.	LTS
Impact AQ-4: Siting of new residences or sensitive receptors along Highway 101 within 170 feet of travel lanes could result in a <i>significant</i> impact.	S	<u>Mitigation Measure AQ-4:</u> Implementation of buffers for emission sources and sensitive land uses shall be required for the Specific Plan.	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
BIOLOGICAL RESOURCES			
<p>Impact BIO-1: The Specific Plan proposes to relocate the planned creek crossing at Imwalle Gardens, and it is likely that creek restoration projects would be conducted in conjunction with creekside developments. The implementation of the Specific Plan could impact, either directly or through habitat modifications, some endangered, rare, or threatened species within the Santa Rosa Creek. This would be a <i>significant</i> impact.</p>	S	<p><u>Mitigation Measure BIO-1:</u> Development shall be designed to minimize disturbance to waterways and riparian vegetation in order to avoid potential impacts to federally listed salmonids. For work in or in close proximity to Santa Rosa Creek, in-stream work shall not start before June 15 and shall be completed by October 15, unless otherwise approved by appropriate agencies. The City shall consult with NOAA Fisheries and CDFG and implement protection measures specified in consultation with those agencies.</p>	LTS
<p>Impact BIO-2: Tree removal, demolition of old buildings and bridge structures, as well as construction disturbances could have a substantial adverse effect on any species identified as a candidate, sensitive, or special-status species. This would be a <i>significant</i> impact.</p>	S	<p><u>Mitigation Measure BIO-2:</u> If there is the potential for destruction of a nest or substantial disturbance to nesting birds or bats due to construction activities, a plan to monitor nesting birds or bats during construction shall be prepared and submitted to the USFWS and CDFG for review and approval. The City shall comply with all USFWS or CDFG guidance for protection of nesting birds.</p> <p>If vegetation, buildings or bridges that potentially provide nesting sites must be removed, a qualified wildlife biologist shall conduct pre-construction surveys. If an active bird nest is found, the bird shall be identified to species and the approximate distance from the closest work site to the nest estimated. No additional measures need be implemented if active nests are more than the following distances from the nearest work site: (a) 300 feet for raptors; or (b) 75 feet for other non-special-status bird species. Disturbance of active nests shall be avoided to the extent possible until it is deter</p>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
BIO-2 <i>continued</i>		<p>mined that nesting is complete and the young have fledged. Bats shall be absent or flushed from roost locations prior to demolition of buildings. If flushing of bats from buildings is necessary, it shall be done by the biologist during the non-breeding season from October 1 to March 31. When flushing bats, structures shall be moved carefully to avoid harming individuals, and torpid bats given time to completely arouse and fly away. During the maternity season from April 1 to September 30, prior to building demolition or construction, a qualified biologist shall determine if a bat nursery is present at any sites identified as potentially housing bats. If an active nursery is present, disturbance of bats shall be avoided until the biologist determines that breeding is complete and young are reared.</p>	
Impact BIO-3: Removal of riparian habitat and restoration efforts along Santa Rosa Creek could have a substantial adverse effect on any riparian habitat or other sensitive natural communities. This would be a <i>significant</i> impact.	S		Mitigation Measure BIO-3: See Mitigation Measure BIO-1.
Impact BIO-4: The implantation of the Specific Plan could interfere substantially with the movement of migratory fish such as Central California Coast Steelhead and California Coast Chinook salmon. Nesting birds, including special-status species such as Allen's hummingbird, could also be affected by the removal of trees and other vegetation. The nurseries of the Yuma myotis bat and the Townsend's western big-eared bat could also be disturbed by demolition or construction during nesting season.	S		Mitigation Measure BIO-4a: See Mitigation Measure BIO-1. Mitigation Measure BIO-4b: See Mitigation Measure BIO-2.

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
CULTURAL RESOURCES			
Impact CULT-1: New development and construction activities, including the widening of existing thoroughfares, that involve ground disturbance could destroy or significantly alter buried archaeological deposits. This would be a <i>significant</i> impact.	S	Mitigation Measure CULT-1a: <u>Prior to the issuance of any entitlements, the City shall refer all projects to the Northwest Information Center (NWIC), which maintains and manages the California Historical Resources Information System for the California Office of Historic Preservation, to determine the likelihood of the proposed project adversely affecting any cultural resources. Archaeological monitoring shall be conducted during earth-disturbing activities in the areas of potential impact. If an archaeological site has been identified in the close vicinity of a construction project, project specific mitigation shall be developed. the adverse impact shall be mitigated by conducting Phase I archaeological testing in order to determine the boundaries of the site, and to ensure site avoidance before the commencement of construction activities. If construction personnel locate buried cultural materials, work shall be halted or shifted to another area and a qualified archaeologist shall be contacted to determine proper treatment of the find.</u>	LTS
		Mitigation Measure CULT-1b: <u>In areas with known resources or are sensitive for archaeological resources, as determined through review by the NWIC, a qualified archaeologist with knowledge of prehistoric and historic-era archaeology shall prepare and carry out an Archaeological Testing, Monitoring, and Data Recovery</u>	

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
CULT-1 <i>continued</i>		<p><u>Plan (ATMDRP) for the site prior to the issue of entitlements.</u> <u>This ATMDRP will emphasize the existing conditions of the proposed project area; examine the sensitivity for intact archaeological deposits in light of specific project designs; and provide treatment options in order to protect archaeological resources that meet the eligibility criteria of the CRHR. The scale and scope of the ATMDRP shall be appropriate to that of the project and its potential effects to cultural resources. The City, or their authorized qualified consultant, shall review the ATMDRP for adequacy.</u> <u>The ATMDRP may include some level of worker orientation program shall to be conducted prior to and during earth-disturbing activities in sensitive area. The program shall This type of program would summarize relevant laws and regulations that protect archaeological resources, and review applicable avoidance and minimization measures to protect archaeological resources. Other protective measures such as <u>exclusionary plastic mesh fencing shall be installed and maintained</u> to prohibit the general public from disturbing sub-surface soils and impacting possible archaeological deposits <u>may also be included as monitoring tools in the ATMDRP.</u></u></p>	

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
CULT-1 <i>continued</i>		<p>Mitigation Measure CULT-1c: The City shall require <u>initiate</u> consultation with Native American tribes whenever necessary prior to submitting <u>the issuance of entitlement applications for land divisions and/or new construction</u> to ensure the respectful treatment of Native American sacred places. <u>Consultation shall explicitly be initiated with the Federated Indians of Graton Rancheria and Dry Creek Rancheria Band of Pomo Indians in order to establish the likelihood and potential of any adverse impacts to Native American cultural or sacred places, including human burials; and to establish the appropriate treatment of such resources. Consultation is defined as meaningful and timely discussion and careful consideration of the views of each party, in a manner that is cognizant of all parties' cultural values, and, where feasible, seeking agreement. Potential Specific mitigation measures of potential impacts shall be considered at the project specific level, and may include but are not limited to site avoidance, site capping, integration of the site into a recreation space, or data recovery excavations.</u></p>	LTS
Impact CULT-2: Any new <u>development or construction activities, including the widening of existing thoroughfares</u> , in the vicinity of a historical structure that is listed or eligible for listing on local, State or national registers could impact or alter the historic <u>historical resource</u> and/or the character or setting of the area. This would be a <i>significant</i> impact.	S	<p>Mitigation Measure CULT-2a: Prior to the issuance of any entitlements, the City shall submit all projects to the Northwest Information Center (NWIC), which maintains and manages the California Historical Resources Information System for the California Office of Historic Preservation, to determine the likelihood of the proposed project adversely affecting any known or unknown cultural resources.</p>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
CULT-2 <i>continued</i>		<p>Mitigation Measure CULT-2ab: <u>Adverse impacts of new design elements on the character of a historic building or area shall be evaluated on a case-by-case basis in accordance with the various local, State and federal laws and regulations protecting these resources. Prior to construction, large format camera Historic American Landscape Survey (HALS) Level II black and white 8 by 10 inch archival quality prints produced by a professional photographer shall be accompanied by a report by a professional architectural historian. A minimum of twenty views shall be documented and two sets of prints shall be sent to the California State Library in Sacramento.</u> <u>Potential adverse impacts to the significance of a historical resource shall be evaluated on a project specific level in accordance with applicable local, State, and federal laws and regulations protecting these resources, including the environmental review process. Strategies such as restoration, rehabilitation, and adaptive reuse shall be encouraged. Photographic documentation is generally not adequate to mitigate a significant adverse impact to a historical resource and therefore large format camera Historic American Landscape Survey (HALS) Level II photographs accompanied by a report by a professional architectural historian shall not be considered a common and acceptable mitigation for demolition of a historical resource.</u></p>	
		<p>Mitigation Measure CULT-2bc: <u>Specific thoroughfare widening projects within the Specific Plan Area shall be designed so that projects do not detract from the character of the historic building or property. The SRCHB should review such projects for adequate mitigation measures before they are implemented.</u></p>	

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
CULT-2 <i>continued</i>		<p><u>Mitigation Measure CULT-2ed</u>: A worker orientation program shall be conducted prior to and during construction activities in sensitive areas as defined at the <u>project specific level</u>. The program shall summarize relevant laws and regulations that protect resources, and review applicable avoidance and minimization measures to protect <u>measures for minimizing impacts to historical resources</u>. Exclusionary plastic mesh fencing shall be installed and maintained to prohibit equipment from impacting significant structures</p>	
<p>Impact CULT-3: Excessive vibration-causing equipment in construction areas located less than 25 feet from significant historic masonry buildings and pile-driving within 200 feet of historic structures could have an adverse impact on the integrity of historic resources within the Specific Plan Area. This would be a <i>significant</i> impact.</p>	S	<p><u>Mitigation Measure CULT-3a</u>: The use of heavy bulldozers and other excessive vibration-causing equipment in construction zones shall be excluded within 25 feet of significant historic buildings or structures <u>or potentially significant historical resources</u>. A system of spot-check monitoring shall also be performed in these locations to ensure that the historic resources do not sustain damage by an architectural historian at the critical times as defined at the project specific level.</p> <p><u>Mitigation Measure CULT-3b</u>: The use of pile-driving equipment during construction activity shall be excluded within 200 feet of all eligible or potentially eligible historic resources; augers shall be used within 200 feet. A system of spot-check monitoring shall also be performed in these locations to ensure that the historic resources do not sustain damage by an architectural historian at the critical times as defined at the project specific level.</p>	LTS

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
GEOLOGY AND SOILS			
<p>Impact GEO-1: Development allowed under the Specific Plan would be subject to seismic ground shaking. This is considered a <i>significant</i> impact.</p>	S	<p><u>Mitigation Measure GEO-1a:</u> All structures in the Specific Plan Area shall be designed in accordance with currently adopted building codes and ordinances of the City of Santa Rosa, including the 2001 California Building Code. A Final Design Review shall be performed by a licensed civil/structural engineer for adherence to the seismic design criteria within the Specific Plan Area.</p> <p><u>Mitigation Measure GEO-1b:</u> A subsurface geotechnical investigation shall be performed to evaluate soils in the subsurface at each proposed development or redevelopment site. The investigation shall include the following elements.</p> <ol style="list-style-type: none"> 1. The investigation shall be performed under the direction of a state licensed Geotechnical Engineer and/or a Certified Engineering Geologist. 2. The subsurface investigation shall include drilling, logging and sampling of boreholes to a minimum depth of 25 feet below the ground surface to evaluate soils for their susceptibility to seismically induced ground failure. 3. If a seismically unstable subsurface material is encountered, the engineer shall identify specific measures to mitigate the impact of seismic ground shaking. Mitigation measures may include soil stabilization techniques such as pressure grouting, specific foundation design measures such as pile foundations, or other methods identified by the engineer. 	LTS

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
GEO-1 <i>continued</i>		<ol style="list-style-type: none"> 4. A written report shall be prepared summarizing the methods used, results of the investigation and specific design measures recommended. 5. Results of the investigation shall be reviewed by the City, or by a qualified independent consultant retained by the City. 6. The City shall require developers to incorporate the mitigation measures into new development. 	
Impact GEO-2: Liquefaction leading to structural damage or collapse of structures could occur within the Specific Plan Area. This is considered a <i>significant</i> impact.	S	<p><u>Mitigation Measure GEO-2:</u> Development of sites within the Specific Plan Area shall require investigation of the potential for soil liquefaction during seismic ground shaking that could result in damage to structures, pavements and utilities. A subsurface geotechnical investigation shall be performed to evaluate soils in the subsurface at each proposed development or redevelopment site. The investigation shall include those elements outlined under Mitigation Measure GEO-1b.</p> <p>The City shall require developers to incorporate the mitigation measures into new development.</p>	LTS
Impact GEO-3: Seismically-induced slope failure and instability adjacent to Santa Rosa Creek may be present in the Specific Plan Area for sites located adjacent to Santa Rosa Creek. This is considered a <i>significant</i> impact.	S	<p><u>Mitigation Measure GEO-3:</u> Any new structures planned within 50 feet from the top of the bank of Santa Rosa Creek shall complete a streambank stability analysis to examine the effect of a new structure on bank stability. Structures to be evaluated shall include paved parking areas, retaining walls, buildings and other site improvements. A licensed Civil Engineer or Certified Engineering Geologist shall complete the slope stability analysis.</p>	LTS

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
GEO-4 <i>continued</i>		<p>Analysis shall include the effect of increased or concentrated runoff on bank erosion, likelihood of foundation pressure causing bank failure and the impact of grading next to the creek bank in terms of future settlement and erosion.</p> <p>Recommendations from the analysis to be incorporated into development plans shall include use of energy dissipaters or other techniques to reduce outflow velocities of storm drains discharging into Santa Rosa Creek, building setback from the creek and stable grading setback from the creek.</p>	
<p>Impact GEO-4: Expansive soils may be present in the Specific Plan Area. Expansive soils may cause damage to pavements, concrete slabs and foundations. This is considered a <i>significant</i> impact.</p>	S	<p>Mitigation Measure GEO-4: A subsurface geotechnical investigation shall be performed to evaluate soils in the subsurface at each proposed development or redevelopment site. The investigation shall include those elements outlined under Mitigation Measure GEO-1b.</p> <p>The City shall require developers to incorporate the mitigation measures into new development.</p>	LTS
HAZARDS AND HAZARDOUS MATERIALS			
<p>Impact HAZ-1: The increased risk from an accidental spill, fire, or other accident associated with the increase in development is considered a <i>significant</i> impact.</p>	S	<p>Mitigation Measure HAZ-1a: Each sub-development in the Specific Plan Area shall be required to prepare and implement a post development Stormwater Pollution Prevention Plan (SWPPP) to prevent runoff from dumpsters, maintenance areas and other areas where potentially hazardous or hazardous materials are stored or used from discharging into site waterways and into Santa Rosa Creek. This plan shall be approved by the City in conjunction with design approval for the project. The SWPPP plan shall include, but not be limited to the following:</p>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
HAZ-1 <i>continued</i>		<ol style="list-style-type: none"> 1. Location of dumpsters and the location of hazardous and potentially hazardous materials storage, including paints, cleaning agents, petrochemicals, and any other potentially hazardous materials storage facilities. The plan shall include details showing coverings and berms to prevent intrusion of rainwater and prevent escape of runoff. Location of signs prohibiting littering and illegal dumping, as well as signs deterring garbage collection services and emergency contacts in the event of a spill. 2. Maintenance and cleanup schedule. This shall include procedures and schedules for sweeping, protecting storm drain inlets from contaminated runoff, cleaning up spills, and eliminating the majority of litter and debris washing into storm drains that may enter local waterways. Regular sweeping is a simple and effective BMP aimed at reducing the amount of litter in storm drain inlets (to prevent clogging) and public waterways (for water quality). The project applicant shall enter into an agreement with the City of Santa Rosa to ensure this maintenance is completed. 	
		<p><u>Mitigation Measure HAZ-1b:</u> Registration and compliance with the Hazardous Materials Business Plan (HMBP), Hazardous Waste Generator Program and Accidental Release Program, wherever applicable, is required for businesses with the following quantities of hazardous materials: at least 55 gallons (liquids), 500 pounds (solids) or 200 cubic feet (gases).</p>	

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
Impact HAZ-2: Development of sites on hazardous materials lists is considered a <i>significant</i> impact.	S	<u>Mitigation Measure HAZ-2a: Developers shall be required to complete a Phase 1 environmental site assessment for each property to be redeveloped. Should the Phase 1 ESA determine a need for additional sampling and testing to determine the extent of any contamination then a Phase 2 shall be completed with sampling and testing of soil and groundwater if applicable. <u>The Santa Rosa Fire Department shall review the Phase I ESA to determine if a Phase II ESA is required. All Phase II ESA investigations shall include the collection and testing of groundwater samples. All discharges to land or water shall be reported to the Santa Rosa Fire Department and the Regional Water Quality Control Board. <u>Development plans for properties where discharges of contaminants have occurred or in close proximity to sites where discharges have occurred shall be reviewed by the Santa Rosa Fire Department and the Regional Water Quality Control Board. Should contamination be found at potentially harmful levels the developer shall complete site remediation in accordance with Mitigation Measure HAZ-2b. <u>Sites containing significant contamination will also be required to prepare a Soil and Groundwater Management Plan as discussed under Mitigation Measure HAZ-2b.</u></u></u></u>	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
HAZ-2 <i>continued</i>		<p>Mitigation Measure HAZ-2b: Developers shall complete site remediation in accordance with OSHA Standards, Santa Rosa Fire Department, Sonoma County Environmental Health Department and <u>State Regional Water Resources Quality Control Board Guidelines</u>. <u>Discharges must be characterized, defined and remediated in accordance with local and State laws, regulations and guidelines</u>. The Department of Toxic Substances Control (DTSC) may become involved wherever toxic levels of contamination are found that pose an immediate hazard. Remediation shall reduce human exposure risk and environmental hazards both during and after construction. The remediation plan shall be prepared in accordance with recommendations of the environmental consultant and established procedures for safe remediation. Specific mitigation measures designed to protect human health and the environment will be provided in the plan. Requirements shall include, but not be limited to the following:</p> <ol style="list-style-type: none"> 1. Documentation of the extent of previous environmental investigation and remediation at the site, including closure reports for Underground Storage Tanks (UST's) and contaminant concentrations. 2. A site specific Health and Safety Plan (HASP) to be prepared by all contractors at the project site, where applicable. This includes a HASP for all demolition, grading and excavation 	

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
HAZ-2 <i>continued</i>	<p>on the site, as well as for future subsurface maintenance work. The HASP shall include appropriate training, any required personal protective equipment, and monitoring of contaminants to determine exposure. The HASP will be reviewed and approved by a Certified Industrial Hygienist.</p>	<p>3. Description of protocols for the investigation and evaluation of previously unidentified hazardous materials that could be encountered during project development, including engineering controls that may be required to reduce exposure to construction workers and future users of the site.</p>	<p>4. Requirements for site-specific construction techniques that would minimize exposure to any subsurface contamination, where applicable. This shall include treatment and disposal measures for any contaminated groundwater removed from excavations, trenches, and dewatering systems in accordance with local and Regional Water Quality Control Board guidelines.</p>
		<p>5. Sampling and testing plan for excavated soils to determine suitability for reuse or acceptability for disposal at a State licensed landfill facility.</p>	
		<p>6. Restrictions limiting future excavation or development of the subsurface by residents and visitors to the proposed development, and prohibition of groundwater development should it be determined from test results.</p>	

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
HAZ-2 <i>continued</i>		<p>7. Completion of an approved remediation plan should land use restrictions be insufficient to allow development to proceed safely. Remediation measures may include excavation and re-placement of contaminated soil with clean fill, pumping and treatment of groundwater, thermal treatment, etc.</p> <p>8. <u>A Site Soil and Groundwater Management Plan shall be required for all sites with significant soil and/or groundwater contamination. Soil impacts must be removed or effectively treated prior to development and property development must not interfere with groundwater investigations and cleanup projects.</u></p>	
Impact HAZ-3: Environmental impact of potential interference with an emergency access or evacuation plan is considered a <i>significant</i> impact.	S	<p><u>Mitigation Measure HAZ-3a:</u> The Fire Department shall review construction plans for roadway modifications, and establish temporary alternative emergency routes necessary for the duration of the construction project. During design review the City shall ensure that roads and driveways are established that meet ordinance and uniform building code requirements for emergency access. The Fire Department shall also review building plans for compliance with the Fire Code and establish future inspection schedule for continuing compliance.</p> <p><u>Mitigation Measure HAZ-3b:</u> The City shall revise the current City of Sonoma and County Emergency Services Plan to reflect new development. It is recommended that any adopted emergency response or evacuation plan include training provisions such as those adopted through the Community Emergency Response Team (CERT) program.</p>	LTS

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
HYDROLOGY AND WATER QUALITY			
Impact HYDRO-1: Demolition and construction for future development and redevelopment proposed in the Specific Plan could potentially violate water quality standards or waste discharge requirements. This would be a <i>significant</i> impact.	S	<p>Mitigation Measure HYDRO-1: Pursuant to the City of Santa Rosa Stormwater Management Plan (SWMP); grading, erosion control and stormwater ordinances; and National Pollutant Discharge Elimination System (NPDES) requirements, each developer shall develop and implement a Storm Water Pollution Prevention Plan(s) (SWPPP) for each individual development or redevelopment project site to protect water quality during and after construction. The Project SWPPP shall include the following mitigation measures for the construction period:</p> <ul style="list-style-type: none"> ◆ Erosion control/soil stabilization techniques such as straw mulching, erosion control blankets, erosion control matting, and hydro-seeding, shall be utilized, in accordance with the regulations and recommendations outlined in the Santa Rosa Area Standard Urban Storm Water Mitigation Plan (SUSMP) adopted by the City of Santa Rosa, Sonoma County, and the Sonoma County Water Agency. Silt fences used in combination with fiber rolls shall be installed down slope of all graded slopes. Fiber rolls shall be installed in the flow path of graded areas receiving concentrated flows and around storm drain inlets. 	LTS

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
HYDRO-1 <i>continued</i>		<ul style="list-style-type: none"> ◆ “Best management practices” (BMPs) shall be implemented for preventing the discharge of other construction-related NPDES pollutants beside sediment (i.e. paint, concrete, etc) to downstream waters. ◆ After construction is completed, all drainage facilities shall be inspected for accumulated sediment, and these drainage structures shall be cleared of debris and sediment. <p>Long-term mitigation measures to be included in the Project SWPPP shall include, but are not limited to, the following:</p> <ul style="list-style-type: none"> ◆ Description of potential sources of erosion and sediment at the proposed project site. Industrial activities and significant materials and chemicals that could be used at the project site should be described. This will include a thorough assessment of existing and potential pollutant sources. ◆ Identification of BMPs to be implemented at the project site based on identified industrial activities and potential pollutant sources. Emphasis shall be placed on source control BMPs, with treatment controls used as needed. ◆ Development of a monitoring and implementation plan. Maintenance requirements and frequency shall be carefully described including vector control, clearing of clogged or obstructed inlet or outlet structures, vegetation/landscape maintenance, replacement of media filters, regular sweeping of 	

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
HYDRO-1 <i>continued</i>		<p>parking lots and other paved areas, etc. Wastes removed from BMPs may be hazardous, therefore, maintenance costs should be budgeted to include disposal at a proper site. Parking lot areas shall be cleared of debris that may enter the storm drain system on a daily basis.</p> <ul style="list-style-type: none"> ◆ The monitoring and maintenance program shall be conducted at the frequency agreed upon by the RWQCB and/or City of Santa Rosa. Monitoring and maintenance shall be recorded and submitted annually to the SWRCB. The SWPPP shall be adjusted, as necessary, to address any inadequacies of the BMPs. ◆ The applicant shall prepare informational literature and guidance on industrial and commercial BMPs to minimize pollutant contributions from the proposed development. This information shall be distributed to all employees at the project site. At a minimum the information shall cover: a) proper disposal of commercial cleaning chemicals; b) proper use of landscaping chemicals; c) clean-up and appropriate disposal of hazardous materials and chemicals; and d) prohibition of any washing and dumping of materials and chemicals into storm drains. 	
Impact HYDRO-2: Increased levels of non-point source pollutants may enter the storm drains of the area and ultimately enter Santa Rosa Creek if not controlled through proper Stormwater Pollution Prevention. This would be a <i>significant</i> impact.	S		LTS
		<p>Mitigation Measure HYDRO-2: Developers will be required to prepare and implement a Specific Plan Area Storm Water Pollution Prevention Program (SWPPP), pursuant to NPDES requirements, as detailed in Mitigation Measure HYDRO-1.</p>	

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
<p>Impact HYDRO-3: Development in the Specific Plan Area may create an increase in flood potential in downstream waters by increasing runoff levels. This would be a <i>significant</i> impact.</p>	S	<p>Mitigation Measure HYDRO-3: In accordance with the Santa Rosa Area Standard Urban Storm Water Mitigation Plan (SUSMP) and Sonoma County Water Agency flood control criteria, developers shall develop a Storm Drain Master Plan for individual projects that includes design drawings and calculations of the capacity of the proposed storm drain system for the project. SUSMP-recommended BMPs such as on-site storm water detention, storm drain line upgrades, or infiltration areas shall be incorporated into the project design, as well as storm water treatment controls such as catch basins, storm water separators, and or/other SUSMP-recommended treatment BMPs. The Storm Drain Plan shall also include a hydraulic analysis prepared consistent with Sonoma County Water Agency flood control design criteria to establish whether the existing municipal system has capacity to accommodate any increased flows resulting from the proposed project. The analysis shall include Rational Method calculations of pre- and post-development 10-year peak flows and shall take into account drainpipe slope and elevations, drainpipe size(s), and system head losses. The Storm Drain Plan shall be submitted to the City of Santa Rosa and the Sonoma County Water Agency for review prior to approval.</p> <p>The Storm Drain Plan should be consistent with the City's SUSMP, SCWA flood control criteria, and General Plan Policies.</p>	LTS

LAND USE

The Specific Plan would not result in significant impacts related to land use; therefore, no mitigation measures are required.

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
NOISE			
Impact NOI-1: Although construction noise would be localized to the individual construction sites, businesses and residences throughout the Specific Plan Area would be intermittently exposed to high levels of noise throughout the construction period. Construction would elevate noise levels at adjacent businesses and residences by 15 to 20 dBA or more. This would be a <i>significant</i> impact.	S	<p><u>Mitigation Measure NOI-1:</u> Developers shall ensure that construction equipment be well maintained and used judiciously to be as quiet as practical. The following measures, when applicable, will be required from developers to reduce noise from construction activities:</p> <ul style="list-style-type: none"> ◆ Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment. ◆ Utilize “quiet” models of air compressors and other stationary noise sources where technology exists. ◆ Locate stationary noise-generating equipment as far as feasible from sensitive receptors when sensitive receptors adjoin or are near a construction project area. ◆ Prohibit unnecessary idling of internal combustion engines. ◆ Pre-drill foundation pile holes to minimize the number of impacts required to seat the pile. ◆ Construct solid plywood fences around construction sites adjacent to operational business, residences or noise-sensitive land uses. ◆ A temporary noise control blanket barrier shall be erected, if necessary, along building facades facing construction sites. This mitigation would only be necessary if conflicts occurred which were irresolvable by proper scheduling. Noise control blanket barriers can be rented and quickly erected. 	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
NOI-1 <i>continued</i>	<ul style="list-style-type: none"> ◆ Route construction-related traffic along major roadways and as far as feasible from sensitive receptors. ◆ Ensure that construction activities (including the loading and unloading of materials and truck movements) are limited to the hours of 7:00 a.m. to 7:00 p.m. ◆ Businesses, residences or noise-sensitive land uses adjacent to construction sites shall be notified of the construction schedule in writing. Designate a “construction liaison” that will be responsible for responding to any local complaints about construction noise. The liaison would determine the cause of the noise complaints and institute reasonable measures to correct the problem. Conspicuously post a telephone number for the liaison at the construction site. 		
<p>Impact NOI-2: The future residential units in the Specific Plan would be exposed to outdoor noise levels in excess of 60 Ldn and indoor levels in excess of 45 Ldn. Future commercial uses along Highway 101, Highway 12 and major arterial roadways would be exposed to outdoor noise levels in excess of 70 Ldn. These noise levels would exceed the City and State established land use compatibility thresholds. This would be a <i>significant</i> impact.</p>	S	<p>Mitigation Measure NOI-2a: In areas where new residential development would be exposed to an L_{dn} of greater than 60 dB, site-specific noise studies shall be conducted to determine the area of impact and to present appropriate mitigation measures to reduce noise levels to within established allowable levels, which may include the following:</p> <ul style="list-style-type: none"> ◆ Utilize site planning to minimize noise in shared residential outdoor activity areas by locating the areas behind the buildings, in courtyards, or orienting the terraces to alleyways rather than streets, whenever possible. 	LTS

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
NOI-2 <i>continued</i>		<ul style="list-style-type: none"> ◆ Mechanical ventilation satisfactory to the City of Santa Rosa should be provided in all units so that windows can remain closed at the choice of the occupants to maintain interior noise levels below 45 dBA L_{dn}. ◆ Sound rated windows and construction methods necessary to provide the requisite noise control for residential units proposed along Highway 101, Highway 12 and NWRP tracks where noise levels could exceed 70 dBA L_{dn}. ◆ Adopt a policy to limit typical instantaneous maximum noise levels caused by railroad trains to 55 dBA L_{max} inside new housing units proposed along the NWRP tracks. ◆ New development shall incorporate the identified mitigation measures contained in the noise study, as approved by the City. 	
		<p><u>Mitigation Measure NOISE-2b:</u> Avoid locating noise sensitive outdoor commercial areas (i.e., outdoor dining, childcare facilities, etc.) adjacent to Highway 101, Highway 12 or major arterial roadways unless they are shielded by sound barriers or structures. Mechanical ventilation should be provided in all noise sensitive commercial uses (i.e., offices, childcare, art galleries, libraries, etc) adjoining Highway 101, Highway 12 or major arterial roadways. Sound rated windows and construction methods may also be necessary.</p>	

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
<p>Impact NOI-3: Structures in the vicinity of development allowed in the Specific Plan Area could be exposed to construction-related vibration during the excavation and foundation work associated with projects implementing the Specific Plan. This would be a <i>significant</i> impact.</p>	S	<p><u>Mitigation Measure NOI-3a:</u> Developers shall reduce vibration from construction activities by implementing the following during construction:</p> <ul style="list-style-type: none"> ◆ Avoid impact pile driving where possible and use drilled piles when possible since drilled piles causes lower vibration levels where geological conditions permit their use. ◆ Avoid using vibratory rollers and tampers near sensitive areas. 	LTS
		<p><u>Mitigation Measure NOI-3b:</u> In areas where project construction is anticipated to include vibration-generating activities, such as pile driving, in close proximity to existing structures, site-specific vibration studies shall be conducted to determine the area of impact and to present appropriate mitigation measures that may include the following:</p> <ul style="list-style-type: none"> ◆ Identification of sites which would include vibration compaction activities, such as pile driving, and have the potential to generate groundborne vibration, while considering the sensitivity of nearby structures to groundborne vibration. Vibration limits shall be applied to all vibration-sensitive structures located within 200 feet of the project. This task shall be conducted by a qualified structural engineer. 	

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TABLE 2-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES (CONTINUED)

Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
NOI-3 <i>continued</i>		<ul style="list-style-type: none"> ◆ Development of a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, set up a vibration monitoring schedule, define structure-specific vibration limits and address the need to conduct photo, elevation and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approached the limits. ◆ At a minimum, vibration monitoring shall be conducted during initial demolition activities and during pile driving activities. Monitoring results may indicate the need for more or less intensive measurements. ◆ When vibration levels approach limits, suspend construction and implement contingencies to either lower vibration levels or secure the affected structures. ◆ Conduct post-survey on structures where either monitoring has indicated high levels or complaints of damage has been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities. 	Appropriate mitigation shall be approved and required by the City prior to commencement of construction.

POPULATION AND HOUSING

The Specific Plan would not result in significant impacts related to population and housing; therefore, no mitigation measures are required.

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Significant Impact	Significance Before Mitigation	Mitigation Measures	Significance With Mitigation
PUBLIC SERVICES AND RECREATION			
<i>The Specific Plan would not result in significant impacts related to public services and recreation; therefore, no mitigation measures are required.</i>			
TRANSPORTATION AND CIRCULATION			
Impact TRANS-1: Buildout of the Specific Plan in the future would exacerbate unacceptable LOS F traffic conditions in both directions on Highway 101, and unacceptable LOS E conditions on westbound State Highway 12. This would be a <i>significant</i> impact.	S	Mitigation Measure TRANS-1: There are no known freeway capacity projects that would result in acceptable operation in the future, and correspondingly no means for fair-share payments for impacts to Highway 101 to be collected.	SU
UTILITIES AND INFRASTRUCTURE			
<i>The Specific Plan would not result in significant impacts related to utilities and infrastructure; therefore, no mitigation measures are required.</i>			

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