



Memorandum

Date: December 18, 2019

To: Joe Ripple, Real Estate Operations, Schellinger Brothers

From: Mary Bean, Vice President, FirstCarbon Solutions

Subject: Determination of Consistency of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

INTRODUCTION

The California Environmental Quality Act (CEQA) includes several exemptions and streamlining provisions that are intended to reduce the amount of duplicative environmental analysis required for projects that are consistent with the level of development anticipated and fully analyzed in a previously certified environmental document.

Government Code Section 65457(a) states that CEQA does not apply to any residential development project (including any subdivision) or any zoning change that is undertaken to implement, and is consistent with, a Specific Plan for which an Environmental Impact Report (EIR) was certified after January 1, 1980. Government Code Section 65457 is implemented by CEQA in Article 12: Special Situations Sections 15182(a) and 15183. Notwithstanding the exceptions found in CEQA Guidelines Section 15162, if the project is consistent with a specific plan for which an EIR has been certified, it ordinarily is statutorily exempt from further CEQA review.

This memorandum summarizes the analysis and conclusions of a series of technical studies that were conducted to analyze the potential impacts of the Burbank Avenue Subdivision Project (project).

The four parcels that comprise the project site were previously analyzed within the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project EIR (2016 Specific Plan EIR), which was certified by the City in 2016.¹ The 2016 Specific Plan EIR was written and specifically intended to be used by the City of Santa Rosa as the environmental document for subsequent projects (Specific Plan EIR, page 1.0-2). The project site is also addressed in the City's General Plan 2035 and the certified EIR for the General Plan (General Plan EIR).

¹ City of Santa Rosa. 2016. Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Projects Environmental Impact Report. August. Website: <https://www.srcity.org/2437/Roseland-Area-Projects-Environmental-Imp>. Accessed November 13, 2019.

The following technical studies were prepared to assist in determining whether the proposed project is consistent with the development anticipated and analyzed within the 2016 Specific Plan EIR and the General Plan EIR:

- Air Quality and Greenhouse Gas Analysis Report
- Biological Resources Assessment
- Delineation of Waters of the U.S. Report
- Geotechnical Investigation
- Phase 1 Environmental Site Assessment
- Historical Resources Study
- Noise Impact Analysis Report
- Traffic Impact Study

Based on the supporting technical analyses contained in this memorandum, the proposed Burbank Avenue Subdivision Project is found to be consistent with the development anticipated and analyzed in the 2016 Specific Plan EIR, and also meets the criteria for a finding of consistency under Government Code 65457, as implemented, in accordance with CEQA Guidelines Sections 15182(a) and 15183.

Site Location

The proposed project site is located east of Burbank Avenue and opposite Roseland Creek Elementary School in the Roseland Neighborhood in the City of Santa Rosa. The proposed site is on 14.6 acres comprised of four merged parcels located at 1400, 1690, 1720, and 1780 Burbank Avenue. The project is located entirely within the City of Santa Rosa's Roseland Area/Sebastopol Road Specific Plan,² which was approved by the City in 2016 pursuant to the 2016 Specific Plan EIR.

Surrounding land uses include residential single-family to the east and rural low-density residential single-family to the north, south, and southwest. Single-family residences directly border the proposed project site to the northwest, west, and south. Roseland Creek Elementary School lies to the northwest corner across Burbank Avenue, and Sheppard Accelerated Elementary School lies adjacent to the southeast boundary of the project site.

Project Description

The Burbank Avenue Subdivision Project (project) proposes to construct 62 lots for single-family units, 12 lots for duplex row houses, and 64 affordable apartments. A total of 138 residential units are planned as part of the development. There is no commercial or industrial component. The proposed site has two entry roads off Burbank Avenue. An apartment complex would be constructed along the southern entry

² City of Santa Rosa. 2016. Roseland Area/Sebastopol Road Specific Plan. Website: <https://srcity.org/DocumentCenter/View/18332/Roseland-AreaSebastopol-Road-Specific-Plan?bidId=>. Accessed October 16, 2019.

road, a duplex complex would be constructed along the northern entry road, and the remainder of the site would be occupied by detached single-family dwellings.

The project site is zoned R-1-6 and the Specific Plan designates the site Medium-Low Density Residential. According to the General Plan 2035, the Medium-Low Density Residential classification permits between 8-13 units per acre and is intended for attached single-family residential development, but single-family detached housing and multi-family development may also be permitted. The General Plan states that development at the mid-point of the density range is desirable, but not required. Utilizing a mid-point of 10 dwelling units per acre (du/acre), the midpoint development for this site would be 146 units.

BURBANK AVENUE SUBDIVISION PROJECT—CONSISTENCY WITH SPECIFIC PLAN EIR

Table 1 provides a comparative summary of the potential impacts of the Burbank Avenue Subdivision Project Impacts with the impacts identified in the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project EIR. The applicability and the project comparison of each mitigation measure are indicated in the table.

Table 1: Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
Air Quality					
Impact 3.3.1: Subsequent land use activities associated with implementation of the proposed project would not conflict with the Bay Area 2010 Clean Air Plan.	Less than Significant	The project would not conflict with or obstruct implementation of the applicable air quality plan.	Less than Significant	None Required	NA
Impact 3.3.2: Subsequent land use activities associated with implementation of the proposed project would not conflict with the Bay Area 2010 Clean Air Plan or result in vehicle miles traveled increases greater than the projected population increases over the project's planning period.	Less than Significant	The project would not violate air quality standards or contribute substantially to an existing or projected air quality violation.	Less than Significant	None Required	NA

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

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<p>Impact 3.3.3: The proposed project could result in short-term construction emissions that could violate or substantially contribute to a violation of federal and state standards. This impact is considered potentially significant.</p>	<p>Less than Significant with Mitigation Measure 3.3.3</p>	<p>The proposed project could result in short-term construction emissions that could violate or substantially contribute to a violation of federal and state standards, but this impact would be reduced to less than significant with implementation of Mitigation Measure 3.3.3 of the 2016 Specific Plan EIR.</p>	<p>Less than Significant with Mitigation Measure 3.3.3</p>	<p>MM 3.3.3: Where projects in the project area are subject to subsequent CEQA review, the City of Santa Rosa must ensure that in addition to the BAAQMD basic construction mitigation measures from Table 8-1 of the BAAQMD CEQA Air Quality Guidelines (or subsequent updates), BAAQMD additional mitigation measures from Table 8-2 of the BAAQMD CEQA Air Quality Guidelines (or subsequent updates) are noted on the construction documents and implemented. These measures include the following:</p> <ol style="list-style-type: none"> 1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. 2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. 3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity. 4. Vegetative ground cover (e.g., fast- 	<p>Yes</p>

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

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				<p>germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.</p> <p>5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.</p> <p>6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.</p> <p>7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12-inch compacted layer of wood chips, mulch, or gravel.</p> <p>8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.</p> <p>9. Minimizing the idling time of diesel powered construction equipment to two minutes.</p> <p>10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and</p>	

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				subcontractor vehicles) would achieve a project wide fleet-average 20 percent NO _x reduction and 45 percent PM reduction compared to the most recent CARB fleet average. 11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings). 12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NO _x and PM. 13. Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy duty diesel engines.	
Impact 3.3.4: The proposed project would not contribute to localized concentrations of mobile-source carbon monoxide (CO) that would exceed applicable ambient air quality standards.	Less than Significant	The project would not expose sensitive receptors to substantial pollutant concentrations.	Less than Significant	None Required	NA

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<p>Impact 3.3.5: The proposed project could result in increased exposure of existing or planned sensitive land uses to construction-source toxic air contaminant (TAC) emissions. This impact is considered potentially significant.</p>	<p>Less than Significant with Mitigation Measure 3.3.5</p>	<p>The project complies with Mitigation Measure 3.3.5 which would ensure that the project construction activities would not expose sensitive receptors to substantial TAC emissions.</p>	<p>Less than Significant with Mitigation Measure 3.3.5</p>	<p>MM 3.3.5: Projects within the project area that have a construction area greater than 5 acres and which are scheduled to last more than two years shall be required to prepare a site-specific construction pollutant mitigation plan in consultation with Bay Area Air Quality Management District (BAAQMD) staff prior to the issuance of grading permits. A project-specific construction-related dispersion model acceptable to the BAAQMD shall be used to identify potential toxic air contaminant impacts, including diesel particulate matter. If BAAQMD risk thresholds (i.e., probability of contracting cancer is greater than 10 in one million) would be exceeded, mitigation measures shall be identified in the construction pollutant mitigation plan to address potential impacts and shall be based on site-specific information, such as the distance to the nearest sensitive receptors, project site plan details, and construction schedule. The City shall ensure construction contracts include all identified measures. Construction pollutant mitigation plan measures shall include but not be limited to limiting the amount of</p>	<p>Yes</p>

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

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				<p>acreage to be graded in a single day, requiring the use of advanced particulate filters on construction equipment, and requiring the use of alternative fuels, such as biodiesel, to power construction equipment.</p>	
<p>Impact 3.3.6: The proposed project could result in the development of housing units (sensitive land uses) near stationary or mobile-source TACs. This impact is potentially significant.</p>	<p>Less than Significant with Mitigation Measure 3.3.6</p>	<p>The project site is not located near any significant stationary or mobile TAC sources and would therefore not expose sensitive receptors to substantial pollutant concentrations.</p>	<p>Less than Significant with Mitigation Measure 3.3.6</p>	<p>MM 3.3.6: The following measures shall be utilized in site planning and building designs to reduce TAC and PM_{2.5} exposure where new receptors are located within 1,000 feet of emissions sources:</p> <ul style="list-style-type: none"> • Future development in the project area that includes sensitive receptors (such as residences, schools, hospitals, daycare centers, or retirement homes) located within 1,000 feet of U.S. 101 and/or stationary sources shall require site-specific analysis to determine the level of health risk. This analysis shall be conducted following procedures outlined by the BAAQMD. If the site-specific analysis reveals significant exposures from all sources (i.e., health risk in terms of excess cancer risk greater than 100 in one million, acute or chronic hazards with a hazard Index greater than 10, or annual PM_{2.5} exposures greater than 0.8 µg/m³), 	<p>Yes</p>

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				<p>measures shall be employed to reduce the risk to below the threshold (e.g., electrostatic filtering systems or equivalent systems and location of vents away from TAC sources).</p> <ul style="list-style-type: none"> Future nonresidential developments projected to generate more than 100 heavy-duty truck trips daily and/or include the need for a BAAQMD permit to operate a stationary source shall include measures to protect public health to ensure they do not cause a significant health risk in terms of excess cancer risk greater than 10 in one million, acute or chronic hazards with a Hazard Index greater than 1.0, or annual PM_{2.5} exposures greater than 0.3 µg/m³. 	
<p>Impact 3.3.8: The proposed project, in combination with cumulative development in the San Francisco Bay Area Air Basin, could result in a significantly cumulative increase of</p>	<p>Cumulatively Considerable /Significant and Unavoidable</p>	<p>The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative</p>	<p>Less than Significant</p>	<p>Implement Mitigation Measure 3.3.3</p>	<p>Yes</p>

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criteria air pollutants for which the air basin is designated nonattainment.		thresholds for ozone precursors).			
Biological Resources					
<p>Impact 3.4.1: Implementation of the proposed project could result in adverse effects, either directly or indirectly, on species listed as endangered, threatened, rare, proposed, and candidate plant and wildlife species as well as plant species identified by the California Native Plant Society (CNPS) with a List rank of 1A or 1B.</p>	<p>Less than Significant with Mitigation Measure 3.4.1</p>	<p>The project would comply with MM 3.4.1 which would ensure that the project would not result in adverse effects, either directly or indirectly, on species listed as endangered, threatened, rare, proposed, and candidate plant and wildlife species as well as plant species identified by the CNPS with a List rank of List 1A or 1B.</p>	<p>Less than Significant with Mitigation Measure 3.4.1</p>	<p>MM 3.4.1a: Implement General Plan Mitigation Measure 4.F-5: The City of Santa Rosa shall incorporate the avoidance and mitigation measures described in the Santa Rosa Plain Conservation Strategy and the USFWS Programmatic Biological Opinion, as conditions of approval for development in or near areas with suitable habitat for California tiger salamander, Burke’s goldfields, Sonoma sunshine, Sebastopol meadowfoam, and many flowered navarretia. However, in accordance with the USFWS Programmatic Biological Opinion, projects within the Southwest Santa Rosa Preserve System will be evaluated individually and mitigation may not necessarily adhere to the ratios described in the Conservation Strategy.</p> <p>MM 3.4.1b: If there is the potential for destruction of a nest or substantial disturbance to nesting birds or bats due to</p>	<p>Yes</p>

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				<p>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. 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 as 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 determined 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 a qualified biologist during the non-breeding season</p>	

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				<p>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>	
<p>Impact 3.4.2: Implementation of the proposed project could result in direct and indirect loss of habitat and individuals of animal and plant species of concern and other non-listed special status species.</p>	<p>Less than Significant with Mitigation Measure 3.4.2</p>	<p>The project would comply with Mitigation Measure 3.4.2 which would ensure the project would not result in direct and indirect loss of habitat and individuals of animal and plant species of concern and other non-listed special status species.</p>	<p>Less than Significant with Mitigation Measure 3.4.2</p>	<p>MM 3.4.2a: Implement Mitigation Measure 3.4.1a and 3.4.1b</p>	<p>Yes</p>

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Impact 3.4.3: Implementation of the proposed project could result in disturbance and degradation of riparian habitat or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.	Less than Significant	No potential impact as the study area lacks suitable habitat to support such species.	Less than Significant	None Required	NA
Impact 3.4.4: Implementation of the project would result in the loss or degradation of protected wetlands or vernal pools.	Less than Significant with Mitigation Measure 3.4.4	The project would comply with Mitigation Measure 3.4.4 which would ensure that the project would not result in the loss or degradation of protected wetlands or vernal pools.	Less than Significant with Mitigation Measure 3.4.4	MM 3.4.4a: Implement Mitigation Measure 3.4.1a MM 3.4.4b: A formal wetland delineation shall be conducted for areas that will be permanently or temporarily impacted by the project. If jurisdictional waters cannot be avoided, the City shall apply for a CWA Section 404 permit from the USACE and a Section 401 permit from the RWQCB. These permits shall be obtained prior to issuance of grading permits and implementation of the proposed project.	Yes

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				<p>The City shall ensure that the project will result in no net loss of waters of the U.S. by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact, as determined in the CWA Section 404/401 permits.</p> <p>Compensatory mitigation may consist of (a) obtaining credits from a mitigation bank; (b) making a payment to an in-lieu fee program that will conduct wetland, stream, or other aquatic resource restoration, creation, enhancement, or preservation activities (these programs are generally administered by government agencies or nonprofit organizations that have established an agreement with the regulatory agencies to use in-lieu fee payments collected from permit applicants); and/or (c) providing compensatory mitigation through an aquatic resource restoration, establishment, enhancement, and/or preservation activity. This last type of compensatory mitigation may be provided at or adjacent to the impact site (i.e., on-site mitigation) or at another location, usually within the same watershed as the permitted</p>	

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				impact (i.e., off-site mitigation). The project proponent/permit applicant retains responsibility for the implementation and success of the mitigation project. Evidence of compliance with this mitigation measure shall be provided prior to construction and grading activities for the proposed project.	
Impact 3.4.5: Implementation of the project could interfere with movement of native resident or migratory fish or wildlife species or establish migratory corridor.	Less than Significant	This is a Specific Plan impact only and is not applicable to the project.	Less than Significant	None Required	NA
Impact 3.4.6: Implementation of the project will not result in a conflict with a local policy or ordinance protecting biological resources.	Less than Significant	Implementation of the project would not result in a conflict with a local policy or ordinance protecting biological resources.	Less than Significant	None Required	NA

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Impact 3.4.7: Development in the project area would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved Conservation Plan.	Less than Significant	Implementation of the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved Conservation Plan.	Less than Significant	None Required	NA
Impact 3.4.8: Development in the project area, when considered together with other past, existing, planned future projects, would result in a significant cumulative impact to biological resources in the region.	Less than Cumulatively Considerable	The project would not result in a significant cumulative impact to biological resources in the region.	Less than Cumulatively Considerable	None Required	NA

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Cultural Resources					
Impact 3.5.1: Redevelopment within the project area could affect historic properties through modification of historic character and though construction activities.	Less than Significant	There are no historic properties that would be affected by the project.	Less than Significant	None Required	NA
Impact 3.5.2: If future projects constructed in the project area involve ground disturbance, implementation of the proposed project could result in the disturbance of known and undiscovered archaeological resources or cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code Section 21074.	Less than Significant with Mitigation Measure 3.5.2	The project would comply with Mitigation Measure 3.5.2 which would ensure the project would result in a less than significant impact.	Less than Significant with Mitigation Measure 3.5.2	MM 3.5.2a: Phase 1 Archaeological Resource Study. When specific projects are proposed within the project area that involve ground-disturbing activity, a site-specific Phase I archaeological resource study shall be performed by a qualified archaeologist or equivalent cultural resources professional that will include an updated records search, pedestrian survey of the project area, development of a historic context, sensitivity assessment for buried prehistoric deposits, and preparation of a technical report that meets federal and state requirements. If significant or unique resources are identified and cannot be avoided, treatment plans will be developed in consultation with the City and appropriate Native American representatives to mitigate potential impacts	Yes

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Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
				<p>to less than significant based on the provisions of Public Resources Code Section 21083.2.</p> <p>MM 3.5.2b: Should any archaeological artifacts be discovered during construction of any project allowed under the Specific Plan, all construction activities shall be halted immediately within 50 feet of the discovery, the City shall be notified, and a professional archaeologist that meets the Secretary of the Interior’s Standards and Guidelines for Professional Qualifications in archaeology and/or history shall be retained to determine the significance of the discovery. The professional archaeologist shall prepare a plan to identify, record, report, evaluate, and recover the resources as necessary, which shall be implemented by the developer. Construction within the area of the discovery shall not recommence until impacts on the archaeological resource are mitigated as described in Mitigation Measure 3.5.2a. Additionally, Public Resources Code Section 5097.993 stipulates that a project sponsor must inform project personnel that collection of any Native American artifacts is prohibited by law.</p>	

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<p>Impact 3.5.3: If future projects constructed under the Specific Plan involve ground disturbance, implementation of the proposed project could result in the disturbance of human remains.</p>	<p>Less than Significant with Mitigation Measure 3.5.3</p>	<p>The project would comply with Mitigation Measure 3.5.3 which would ensure the project would result in a less than significant impact.</p>	<p>Less than Significant with Mitigation Measure 3.5.3</p>	<p>MM 3.5.3a: Implement Mitigation Measure 3.5.2a (Phase 1 Archaeological Resource Study). MM 3.5.3b: Should human remains be discovered during construction of any project allowed under the Specific Plan, all construction activities shall be halted immediately within 50 feet of the discovery, the City shall be notified, and the Sonoma County Coroner shall be notified, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California’s Health and Safety Code. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in CEQA Section 15064.5(d) and (e) shall be followed.</p>	<p>Yes</p>
<p>Impact 3.5.4: Implementation of the proposed project, along with any foreseeable development in the project vicinity, could contribute to</p>	<p>Less than Cumulatively Considerable</p>	<p>The project would not contribute to cumulative impacts to cultural resources.</p>	<p>Less than Cumulatively Considerable</p>	<p>None Required</p>	<p>NA</p>

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cumulative impacts to cultural resources.					
Greenhouse Gas (GHG) Emissions					
Impact 3.7.1: The project would not conflict with an applicable plan adopted for the purpose of reducing GHG emissions.	Less than Cumulatively Considerable	The project would not conflict with any applicable plan, policy or regulation of an agency adopted to reduce the emissions of GHG.	Less than Cumulatively Considerable	None Required	NA
Hazards and Hazardous Materials					
Impact 3.8.1: Implementation of the proposed project would result in the use, storage, and transport of hazardous materials. Accidental release of these materials could constitute a hazard to the public or the environment.	Less than Significant	This is a Specific Plan impact only and is not applicable to the project.	Less than Significant	None Required	NA

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Impact 3.8.2: New development in the project area would lead to an associated increase in use of hazardous materials. The proposed project therefore has potential to result in an increased risk of accidental release of hazardous materials.	Less than Significant	This is a Specific Plan impact only and is not applicable to the project.	Less than Significant	None Required	NA
Impact 3.8.3: Several schools are located within and in the vicinity of the project area. Hazardous materials or substances may be handled in the vicinity of these schools.	Less than Significant	The project would not introduce new hazardous materials or substances to the project vicinity.	Less than Significant	None Required	NA

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

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<p>Impact 3.8.4: Review of environmental hazards databases conducted in association with the proposed project identified hazardous materials sites in the project area.</p>	<p>Less than Significant with Mitigation Measure 3.8.4b</p>	<p>The project would comply with Mitigation Measure 3.8.4 which would ensure the project would result in a less than significant impact.</p>	<p>Less than Significant with Mitigation Measure 3.8.4b</p>	<p>MM 3.8.4a: Phase I Environmental Site Assessment. Developers shall be required to complete a Phase I environmental site assessment for each property to be developed or redeveloped. If a Recognized Environmental Condition (REC) is identified in a Phase I environmental site assessment, a Phase II environmental site assessment shall be prepared to determine whether conditions are present that require remediation or other controls to minimize the potential for hazardous materials contamination to adversely affect public health and the environment. If remediation is required, developers shall complete site remediation in accordance with OSHA standards and Santa Rosa Fire Department, Sonoma County Environmental Health Department, and State Water Resources Control Board guidelines. The Department of Toxic Substances Control (DTSC) may become involved wherever toxic levels of contaminants 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</p>	<p>Yes</p>

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
				<p>accordance with the environmental consultant’s recommendations 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> <ul style="list-style-type: none"> • Documentation of the extent of previous environmental investigation and remediation at the site, including closure reports for underground storage tanks (USTs) and contaminant concentrations. • A site-specific health and safety plan to be prepared by all contractors at the project site, where applicable. This includes a plan for all demolition, grading, and excavation on the site, as well as for future subsurface maintenance work. The plan shall include appropriate training, any required personal protective equipment, and monitoring of contaminants to determine exposure. The Health and Safety Plan shall be reviewed and approved by a certified industrial hygienist. • Description of protocols for the investigation and evaluation of previously unidentified 	

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
				<p>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> <ul style="list-style-type: none"> • Requirements for site-specific construction techniques that would minimize exposure to any subsurface contamination, where applicable, which 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. • Sampling and testing plan for excavated soils to determine suitability for reuse or acceptability for disposal at a state-licensed landfill facility. • 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 that contamination is present. The restrictions 	

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
				<p>would be developed based on site-specific conditions and would reflect the requirements of the RWQCB and/or DTSC, depending on which agency is responsible for oversight of the particular site. Restrictions, which are sometimes also referred to as land use covenants, shall be recorded with the parcel(s), shall run with the land. The developer or land owner successor(s)-in-interest shall be responsible for ensuring development complies with the restrictions. Compliance with the restrictions must be demonstrated to the satisfaction of the City before a grading permit is issued.</p> <ul style="list-style-type: none"> • Completion of an approved remediation plan should land use restrictions be insufficient to allow development to proceed safely. Remediation measures may include excavation and replacement of contaminated soil with clean fill, pumping and treatment of groundwater, thermal treatment, etc. <p>MM 3.8.4b: In the event previously unknown contaminated soil, groundwater, or subsurface features are encountered or have the potential</p>	

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
				<p>be present during ground-disturbing activities at any site, work shall cease immediately, and the developer’s contractor shall notify the City of Santa Rosa Fire Department for further instruction. The City shall ensure any grading or improvement plan or building permit includes a statement specifying that if hazardous materials contamination is discovered or suspected during construction activities, all work shall stop immediately until the City of Santa Rosa Fire Department has determined an appropriate course of action. Such actions may include, but would not be limited to, site investigation, human health and environmental risk assessment, implementation of a health and safety plan, and remediation and/or site management controls. The City of Santa Rosa Fire Department shall be responsible for notifying the appropriate regulatory agencies and providing evidence to the City Planning and Economic Development Department that potential risks have been mitigated to the extent required by regulatory agencies. Work shall not recommence on an impacted site until the applicable regulatory agency has</p>	

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
				determined further work would not pose an unacceptable human health or environmental risk. Deed restrictions may be required as provided under Mitigation Measure MM 3.8.4a.	
Impact 3.8.5: The proposed project could have an impact on area roadways used to respond to hazardous materials incidents and/or for emergency evacuations.	Less than Significant	This is a Specific Plan impact only and is not applicable to the project.	Less than Significant	None Required	NA
Impact 3.8.6: Implementation of the proposed project, in combination with other existing and reasonably foreseeable future projects, may result in cumulative hazards and hazardous materials impacts.	Less than Cumulatively Considerable	The project would not result in cumulative hazards and hazardous materials impacts.	Less than Cumulatively Considerable	None Required	NA

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
Noise					
Impact 3.11.1: The proposed project would not expose residents to traffic noise or stationary sources of noise in excess of established standards.	Less than Significant	Project would not result in noise levels in excess of established standards.	Less than Significant	None Required	NA
Impact 3.11.2: Project operation would generate increased local traffic volumes that could cause a substantial permanent increase in ambient noise levels in the project vicinity.	Less than Significant	Project would not generate a substantial permanent increase in ambient noise levels.	Less than Significant	None Required	NA
Impact 3.11.3: Planned development under the proposed project would be required to comply with City noise standards set forth in the City Code.	Less than Significant	Project would comply with applicable City noise ordinance requirements.	Less than Significant	None Required	NA

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
Impact 3.11.4: Construction activities could cause a substantial temporary increase in ambient noise levels at nearby noise sensitive land uses, which may result in increased levels of annoyance, activity interference, and sleep disruption.	Less than Significant	Project would comply with the City’s standard conditions of approval limiting hours of construction, and therefore would result in a less than significant impact.	Less than Significant	None Required	NA
Impact 3.11.5: The proposed project, when considered in combination with other past, existing, planned future projects, would result in increased noise levels.	Less than Cumulatively Considerable	The project, when considered in combination with other past, existing, planned future projects, would not result in a significant increase in ambient noise levels.	Less than Cumulatively Considerable	None Required	NA

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
Traffic and Transportation					
Impact 3.14.1: Project traffic would not degrade corridor operations to unacceptable levels of service under Existing Plus Project conditions.	Less than Significant	Project traffic would not degrade corridor operations to unacceptable levels of service under Existing Plus Project conditions	Less than Significant	None Required	NA
Impact 3.14.2: Project traffic would have the potential to degrade mainline freeway operations to unacceptable levels of service under Existing Plus Project conditions.	Less than Significant	Project traffic would not degrade mainline freeway operations to unacceptable levels of service under Existing Plus Project conditions.	Less than Significant	None Required	NA
Impact 3.14.3: Project traffic would have the potential to degrade freeway ramp operations to an unacceptable level of service at the	Less than Significant	The project's impact would be considered less-than-significant as the intersection would operate acceptably overall.	Less than Significant	None Required	NA

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
southbound U.S. 101 freeway off-ramp at Hearn Avenue under Existing Plus Project conditions.					
Impact 3.14.4: The proposed project includes various roadway improvements that would be designed and constructed according to City-approved design standards to ensure safety.	Less than Significant	This is a Specific Plan impact only and is not applicable to the project.	Less than Significant	None Required	NA
Impact 3.14.5: Implementation of the proposed project would not interfere with emergency access within the project area.	Less than Significant	The project would not interfere with emergency access within the project area.	Less than Significant	None Required	NA

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
Impact 3.14.6: Implementation of the proposed project would not conflict with any alternative transportation policies or plans.	Less than Significant	The project would not conflict with any alternative transportation policies or plans.	Less than Significant	None Required	NA
Impact 3.14.7: Implementation of the proposed project would result in improvements to pedestrian and bicycle circulation in the project area that would enhance connectivity and safety.	Less than Significant	The project's condition of approval would ensure installation of full frontage improvements consistent with the Santa Rosa Roseland Area/Sebastopol Road Specific Plan, though striping of the pavement to include a bike lane should be deferred until a more continuous facility can be provided.	Less than Significant	None Required	NA
Impact 3.14.8: Implementation of the proposed project would have a beneficial impact on bus transit by concentrating uses in	Less than Significant	The project has requested that the City of Santa Rosa consider initiating a CityBus route along Burbank Avenue to serve this developing area.	Less than Significant	None Required	NA

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
<p>a transit-oriented development pattern and by increasing connectivity to transit facilities.</p>					
<p>Impact 3.14.9: Construction activities associated with project implementation may temporarily affect vehicular, pedestrian, bicycle, and transit circulation.</p>	<p>Less than Significant with Mitigation Measure 3.14.9</p>	<p>The project would comply with Mitigation Measure 3.14.9 which would ensure that construction activities would not affect vehicular, pedestrian, bicycle, and transit circulation</p>	<p>Less than Significant with Mitigation Measure 3.14.9</p>	<p>MM 3.14.9: Prior to construction activities, applicants seeking to construct projects in the project area shall submit a construction traffic control plan to the City of Santa Rosa for review and approval. The plan shall identify the timing and routing of all major construction-related traffic to avoid potential congestion and delays on the local street network. Any temporary road or sidewalk closures shall be identified along with detour plans for rerouting pedestrian and bicycle traffic for rerouting pedestrian and bicycle traffic. The plan shall also identify locations where transit service would be temporarily rerouted or transit stops moved, and these changes must be approved by the Santa Rosa CityBus and Sonoma County Transit before the plan is finalized. If necessary, movement of major construction equipment and materials shall be limited to off-peak hours to avoid conflicts with local traffic circulation.</p>	<p>Yes</p>

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
Impact 3.14.10: Project traffic, when considered together with other past, present, and future development, would have the potential to degrade corridor operations to unacceptable levels of service (Future Plus Project or cumulative condition).	Less than Cumulatively Considerable	The project would not result in a significant contribution to cumulative impacts.	Less than Cumulatively Considerable	None Required.	Yes
Impact 3.14.11: Project traffic, when considered together with other past, present, and future development, would have the potential to degrade mainline freeway operations to unacceptable levels of service (Future Plus Project or “cumulative” conditions).	Cumulatively Considerable /Significant and Unavoidable	The project would not result in a significant contribution to cumulative impacts.	Less than significant.	None Available	NA

Table 1 (cont.): Comparison of the Burbank Avenue Subdivision Project with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Project Environmental Impact Report

Evaluation Criteria	Specific Plan EIR Level of Significance	Project Comparison	Project Level of Significance	Mitigation Measure	Less than Significant with Specific Plan EIR Mitigation Measure Incorporated? (NA=Not Applicable)
<p>Impact 3.14.12: Project traffic, when considered together with other past, present, and future development, would have the potential to degrade freeway ramp operations to an unacceptable level of service at the westbound SR 12 freeway off-ramp at Dutton Avenue (Future Plus Project or cumulative conditions).</p>	<p>Less than Significant with Mitigation Measure 3.14.12</p>	<p>This Mitigation Measure is the responsibility of the City of Santa Rosa and the City's Capital Improvement Program. However, this project has provided a Traffic Impact Assessment, which contributes to the City's monitoring efforts to help identify an appropriate timeline to widen the Dutton Avenue westbound off-ramp to extend the right turn pocket to a minimum length of 550 feet to alleviate the adverse queuing onto the mainline freeway.</p>	<p>Less than Significant with Mitigation Measure 3.14.12</p>	<p>MM 3.14.12: The City shall widen the Dutton Avenue westbound off-ramp to extend the right turn pocket to a minimum length of 550 feet to alleviate the adverse queuing onto the mainline freeway. The City shall monitor queuing conditions on the ramp through field observations and review of development traffic impact studies and add the widening project to the Capital Improvement Program once it is determined that queues are likely to exceed storage within a five-year time frame. The City shall collaborate with Caltrans in obtaining approvals to complete the widening project.</p>	<p>NA</p>

SUMMARY OF ANALYSIS AND CONCLUSIONS OF THE TECHNICAL REPORTS

The following is a summary of the analysis and conclusions of each of the technical studies that were prepared for the Burbank Avenue Subdivision Project.

Air Quality and Greenhouse Gas Emissions Analysis Report

The analysis and conclusions of the Air Quality and Greenhouse Gas (GHG) Emissions Analysis Report prepared for the proposed project by FirstCarbon Solutions (FCS) show that with implementation of the Mitigation Measures 3.3.3 and 3.3.5 from the 2016 Specific Plan EIR, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan and would therefore result in a less than significant environmental impact. The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard. The proposed project would not expose sensitive receptors to substantial pollutant concentrations. The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The proposed project would generate direct and indirect GHG emissions; however, the project would not result in significant environmental impacts that are “peculiar to” the affected parcels or project and that were not addressed as significant impacts in the 2016 Specific Plan EIR. Nor is there any substantial new information that shows any impact will be more significant than described in the previous EIR. Furthermore, the proposed project would not conflict with any applicable plan, policy, or regulation of an agency adopted to reduce the emissions of GHG into the environment. With implementation of the Mitigation Measures 3.3.3 and 3.3.5 of the 2016 Specific Plan EIR, the project air quality and GHG emission impacts would be considered less than significant. These findings are consistent with the findings of the 2016 Specific Plan EIR.

Biological Resources Assessment and Wetland Delineation Report

The Biological Resources Assessment, dated December 17, 2019, and the Delineation of Waters of the U.S. Report, dated June 2019, were both prepared by WRA, Inc. Below is a summary of the analysis and conclusions of these reports.

Special-status Plant Species

Four special-status plant species were determined to have a moderate potential to occur in the project study area. All listed plant species covered by the Santa Rosa Plain Conservation strategy, including Burke’s goldfields, Sonoma sunshine, and Sebastopol meadowfoam, have a moderate potential to occur within the project study area due to the presence of seasonal wetlands. However, seasonal wetlands within the project study area are highly disturbed by previous and continued discing or mowing activities, and these areas are dominated by non-native annual grasses, which likely outcompete many native annual forb species.

Two consecutive years of protocol-level rare plant surveys were conducted within the project study area, during which no special-status plants were observed to occur within the project study area. Therefore, special-status plant species are presumed absent. Per the Programmatic Biological Opinion (PBO), since two consecutive years of protocol-level surveys have been conducted according to the United States Fish and Wildlife Service (USFWS) protocols and no listed plants were detected, then *the seasonal wetlands on-site would be considered unoccupied suitable habitat.*

Special-status Bird Species

Eight special-status bird species were determined to have a moderate potential to occur within the project study area. Additionally, many non-special-status native nesting birds which are protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code may be present within the project study area.

Specifically, special-status bird species including Allen's hummingbird, Nuttall's woodpecker, oak titmouse, and white-tailed kite, and non-special-status birds protected by the MBTA and California Fish and Game Code have potential to occur in the project study area. Impacts to special-status and non-special-status birds could potentially occur by modifying nesting habitat, or by causing disturbance of a sufficient level to cause abandonment of an active nest. Potential impacts to these species and their habitats could occur during the removal of vegetation and structures, grading, or ground-disturbing activities. These activities could result in the direct removal or destruction of the active nests of protected bird species. These activities may also create audible, vibratory, and/or visual disturbances that cause birds to abandon active nests.

Activities that result in the direct removal of active nests or disturbance to breeding birds sufficient to result in the abandonment of active nests would be potentially significant under CEQA. However, in compliance with the goals and policies of the Specific Plan, implementation of the following recommended conditions of approval would ensure potential impacts are reduced to less than significant.

Recommended Conditions of Approval

- BRA-1** WRA, Inc. recommends the following conditions of approval be implemented to avoid impacts to Allen's hummingbird, Nuttall's woodpecker, oak titmouse, white-tailed kite and nesting birds protected by the MBTA and the California Fish and Game Code.
- If ground disturbance or vegetation removal is initiated in the non-breeding season (September 1 through January 31), no pre-construction surveys for nesting birds are required and no adverse impact to birds would result.
 - If ground disturbance or removal of vegetation occurs in the breeding bird season (February 1 through August 31), pre-construction surveys should be performed by a qualified biologist no more than 14 days prior to commencement of such activities to determine the presence and location of nesting bird species. If active nests are present, establishment of temporary no-work buffers around active nests will prevent

adverse impacts to nesting birds. Appropriate buffer distance should be determined by a qualified biologist and is dependent on species, surrounding vegetation, and topography. Once active nests become inactive, such as when young fledge the nest or the nest is subject to predation, work may continue in the buffer area and no adverse impact to birds will result.

Special-status Bat Species

The project study area contains uninhabited buildings and trees that may provide roost structures to bat species documented in the vicinity and outlined in Appendix B of the Biological Resources Assessment (fringed myotis, long-eared myotis, long-legged myotis, and pallid bat). At the time of the site visit, the buildings were secured at typical points of entry. However, bats are known to use buildings' relatively small entry and egress points that the initial site visit did not assess. Any planned demolition of these trees and buildings could potentially impact bat species that may use them as a roost. Potential impacts to these species and their roost habitats could occur during the removal of structures and/or vegetation. These activities could result in the direct removal or destruction of the maternity roost. These activities may also create audible, vibratory and/or visual disturbances that cause maternity roosting bats to abandon their roost site.

Activities that result in the direct removal of active roosts or disturbance to maternity roosting bats sufficient to result in the abandonment of the roost would be potentially significant under CEQA. However, in compliance with the goals and policies of the Specific Plan, implementation of the following recommended conditions of approval would ensure potential impacts are reduced to less than significant.

Recommended Conditions of Approval

BRA-2 WRA, Inc. recommends the following condition of approval be implemented to avoid impacts to special-status bat species:

- Pre-construction roost assessment survey: A qualified Biologist should conduct a roost assessment survey of uninhabited structures/residences located within the Study Area. The survey will assess use of the structure for roosting as well as potential presence of bats. If the biologist finds no evidence of, or potential to support bat roosting, no further measures are recommended. If evidence of bat roosting is present, additional measures described below should be implemented:
 - Work activities outside the maternity roosting season: If evidence of bat roosting is discovered during the pre-construction roost assessment and demolition is planned August 1 through February 28 (outside the bat maternity roosting season), a qualified biologist should implement passive exclusion measures to prevent bats from re-entering the structures. After sufficient time to allow bats to escape and a follow-up survey to determine if bats have vacated the roost, demolition may continue and impacts to special-status bat species will be avoided.

- Work activities during the maternity roosting season: If a pre-construction roost assessment discovers evidence of bat roosting in the uninhabited residences during the maternity roosting season (March 1 through July 31), and determines maternity roosting bats are present, demolition of maternity roost structures will be avoided during the maternity roosting season or until a qualified biologist determines the roost has been vacated.

California Tiger Salamander—Critical Habitat

While the California tiger salamander is considered unlikely to be present within the project study area, the project study area is within designated critical habitat for the California tiger salamander. Therefore, all non-developed areas within the project study area including non-native grassland, seasonal wetland depression, and seasonal wetland ditch are considered potential non-breeding habitat for the California tiger salamander, and impacts to these habitats require mitigation. Based upon the PBO, the appropriate ratio for habitat mitigation within the project study area is 1 acre of mitigation for every 1 acre of impact; the relevant parameter for determining this ratio is the location of nearest documented breeding habitat areas located between 2,200 feet (0.42-mile) and 1.3 miles from the project study area or reported adult occurrences. Mitigation is generally recommended to occur within the same area where impacts are taking place or mitigation bank credits may be purchased from an approved mitigation bank. In this case, the project study area lies within the Southwest Santa Rosa Preserve System conservation area, southeast from Wright, northeast from Llano, and directly north from Stony Point conservation areas. As stated in the Conservation Strategy, considering the developed nature of the Southwest Santa Rosa Preserve System, other conservation areas are recommended for mitigation. Therefore, the areas recommended to mitigate for habitat lost within the Study Area would be the Wright, Llano, or Stony Point Conservation Areas. Although the Conservation Strategy and PBO provide guidelines for habitat mitigation within the Santa Rosa Plain, final habitat mitigation ratios and location of mitigation lands will be determined during Section 7 Endangered Species Act consultation with the USFWS and CDFW.

Protected Trees

The proposed project may result in the removal of approximately 20 trees that are large enough and of qualifying species (e.g. valley oak, coast redwood) to be considered heritage trees per the Tree Ordinance. A tree removal permit is required for any alteration, removal or relocation of heritage, protected, or street trees. The City of Santa Rosa City Code and Burbank Avenue Annexation Project EIR require replacement plantings for mature valley oaks and other protected trees as a condition of approval in order to mitigate for the loss of functions provided by trees to be removed including shade, erosion control, groundwater replenishment, visual screening, and wildlife habitat. Prior to the issuance of a grading permit, an Arborist Survey will be required to determine the precise quantity of protected trees on-site that will be impacted by the project. Tree replacement shall be approved by the Department of Community Development. However, in compliance with the goals and policies of the

Specific Plan, implementation of the following recommended conditions of approval would ensure potential impacts are reduced to less than significant.

Recommended Conditions of Approval

BRA-3 WRA, Inc. recommends the following condition of approval be implemented to avoid impacts to protected trees:

- Each applicant for future development projects shall prepare valley oak mitigation and monitoring plan, which will demonstrate that mature valley oaks are being preserved to the extent feasible and that measures are included in construction and design of the project to ensure long-term preservation of oaks. The City must approve removal of any protected trees.
- Each applicant shall comply with the requirements of the City's Tree Ordinance concerning the replacement of any valley oaks, and other protected trees, that must be removed as a result of project activities, or, with the agreement of the City, payment of the appropriate fee in lieu of planting the replacement trees. If planting of replacement trees is implemented to comply with the Ordinance, the trees shall either be planted on the Project site, or with the agreement of the City, on public property.
- For each 6 inches or fraction thereof of the diameter of a tree which was approved for removal, two trees of the same genus and species as the removed tree (or another species, if approved by the City), each of a minimum 15-gallon container size, shall be planted on the project site, provided however, that an increased number of smaller size trees of the same genus and species may be planted if approved by the City, or a fewer number of such trees of a larger size if approved by the City.
- If the development site is inadequate in size to accommodate the replacement trees, the trees shall be planted on public property with the approval of the Director of the City's Recreation and Parks Department. Upon the request of the developer and the approval of the Director, the City may accept an in-lieu payment of \$100.00 per 15-gallon replacement tree on condition that all such payments shall be used for tree-related educational projects and/or planting programs of the City.
- A qualified biologist shall develop a revegetation plan for any valley oaks that must be removed, and monitor the growth and survival of the newly planted trees. Revegetation plans shall require monitoring newly transplanted trees for at least five years, and the replacement of all transplanted trees that die during the monitoring period.

The following requirements apply in addition to those in the City of Santa Rosa Tree Ordinance and Burbank Avenue Annexation Project EIR

- Existing developed parcels within 50 feet of a scenic road. A Tree Removal Permit is required prior to the removal of any tree, including an exempt tree. Prior to the approval of a Tree Removal Permit, the applicant shall demonstrate that the removal of the tree will not have a negative

impact on the scenic quality of the corridor, or that the tree is a hazard and/or unhealthy as determined by the Director. If the Director cannot determine whether the tree is a hazard or the health of the tree, the applicant shall hire an arborist to make the determination.

- Tree removal for new development within 100 feet of a scenic road. Special care shall be taken to preserve the maximum number of trees possible, including exempt trees. Prior to the approval of a project the applicant shall demonstrate that each tree proposed for removal shall not have a negative impact on the scenic quality of the corridor, or that the tree is a hazard or unhealthy, as determined by a certified arborist

Wetland Delineation

The findings of the Delineation of Waters of the U.S. Report prepared by WRA, Inc. are concluded as follows. The project study area was determined to contain 0.25-acre of wetlands that may be subject to United States Army Corp of Engineers (USACE) jurisdiction under Section 404 of the Clean Water Act. A Section 404 permit would require mitigation for impacts to jurisdictional wetlands and non-wetland waters, and would ensure impacts to wetlands would be mitigated to less than significant.

The project has been analyzed for consistency with Section 3.9, "Vegetation, Wildlife, and Habitat" of the Mitigation Monitoring and Reporting Program (MMRP) of the 2016 Specific Plan EIR. The project will comply with the applicable Mitigation Measures (i.e. Mitigation Measures 3.9-1, 3.9-3, 3.9-6, 3.9-7, 3.9-8, and 3.9-9) described within the MMRP. Mitigation Measures described in the MMRP not applicable to the project include Mitigation Measures 3.9-2 and 3.9-4; Mitigation Measure 3.9-2 addresses impacts to valley oak riparian woodland, not present in the Study Area, and Mitigation Measure 3.9-4 addresses potential exotic plant and animal impacts to avoided wetlands. However, the project will impact and mitigate for the entirety of existing wetlands, therefore no impact from inadvertent exotic species introductions to wetlands will occur. The implementation of the aforementioned Section 404 permitting compliance requirement will ensure all project impacts to jurisdictional wetlands are less-than-significant. This is consistent with the findings of the 2016 Specific Plan EIR.

Compliance with the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Projects EIR and MMRP

The aforementioned recommended avoidance, minimization, and mitigation measures have been analyzed for consistency with, and developed in accordance with the EIR and MMRP of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Projects (Michael Baker 2016a, 2016b). The above measures are consistent with the Biological Resources Mitigation Measures (i.e. Mitigation Measures [MM] 3.4.1[ab], and 3.4.2 [a-b]) described within the MMRP. The implementation of the aforementioned avoidance, minimization, and mitigation measures will ensure all Project impacts to biological resources are less-than-significant.

Geotechnical Investigation and Phase 1 Environmental Site Assessment Reports

The Geotechnical Investigation for Proposed Residential Development at 1400, 1690, 1720, and 1780 Burbank Avenue was prepared by PJC & Associates, Inc. and dated January 21, 2019. The Phase 1 Environmental Report Site Assessment was prepared by Harris and Lee Environmental Sciences, LLC., and dated July 24, 2018. The analysis and conclusions of both reports are summarized as follows.

The Geotechnical Investigations report concluded that the project is feasible from a geotechnical engineering standpoint provided the recommendations and criteria presented in the report are incorporated in the design and carried out through construction. The primary geotechnical considerations in design and construction of the project are: (a) weak and compressible native soils, and (b) the presence of highly expansive clay soils.

The Phase 1 Environmental Site Assessment report *revealed no evidence of recognized environmental conditions in connection with the property.*

Therefore, the project would not introduce any new geotechnical or Phase I environmental site impacts, and impacts would be considered less than significant. These findings are consistent with the findings of the 2016 Specific Plan EIR.

Historical Resources

The Historical Resources Study for the Burbank Avenue Subdivision Project was prepared by Tom Origer & Associates and dated December 21, 2018. The study was conducted to meet the requirements of the Planning Division of the City of Santa Rosa and the requirements of CEQA. One isolated obsidian flake was observed within the project study area. The isolated specimen does not constitute an archaeological site and no resource-specific recommendations were made. Documentation pertaining to this study is on file at the offices of Tom Origer & Associates (File No. 2018-104).

The Mitigation Measures 3.5.2a, 3.5.2b, 3.5.3a, and 3.5.3b, of the 2016 Specific Plan EIR are still applicable to the project and would ensure that historical resource impacts would be reduced to less than significant. These findings are consistent with the findings of the 2016 Specific Plan EIR.

Noise and Vibration

The Noise Impact Analysis Report was prepared by FCS on November 8, 2019. The report concluded that the project would not conflict with the City's noise land use plan, policy, or regulations. Furthermore, the analysis showed that with compliance with the City's standard conditions of approval for permissible hours of construction, environmental impacts related to construction and operation noise would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established. The analysis also concluded that the project would not generate excessive groundborne vibration or noise during construction or operation. Furthermore, the project would not be located within the noise contour vicinity of a public or private airport. Therefore,

project-related noise impacts would be considered less than significant, consistent with the findings of the 2016 Specific Plan EIR.

Traffic Impact Study

The Traffic Impact Study for the Burbank Avenue Subdivision Project was completed for the City of Santa Rosa by W-Trans on December 11, 2019.

The proposed project is expected to generate an average of 1,158 new daily vehicle trips, including 83 trips during the weekday AM peak-hour and 108 trips during the weekday PM peak-hour.

The study intersections of Burbank Avenue with Sebastopol Road, Hughes Avenue, and Hearn Avenue are currently operating acceptably at Level of Service (LOS) A overall during both peak-hours, though it is noted that the southbound approach at Hearn Avenue/Burbank Avenue is operating at LOS F during both the AM and PM peak-hours.

The study intersections are expected to continue operating acceptably overall during both peak-hours upon the addition of project-related traffic to Existing volumes. Although the southbound approach at Hearn Avenue/Burbank Avenue is expected to operate at LOS F during both peak-hours, the project's impact would be considered less-than-significant as the intersection would operate acceptably overall.

Under Baseline volumes, which include the addition of traffic associated with Roseland Accelerated Middle School, Roseland Village, and Sebastopol Road Town Homes, the study intersections would be expected to continue operating acceptably overall, while the southbound approach at Hearn Avenue/Burbank Avenue would continue to operate with substantial delays. The intersection would drop to LOS E during the a.m. peak hour with the addition of project traffic, which would be considered a significant impact. It is noted, however, that without the addition of the Roseland Accelerated Middle School traffic, the operation of the intersection with the project and the remaining Baseline projects would remain at LOS C, indicating that the school is the primary trip generator contributing to the need for a traffic signal.

The proposed pedestrian facilities along the project frontage are consistent with the planned improvements to Burbank Avenue outlined in the Santa Rosa Roseland Area/Sebastopol Road Specific Plan. Upon completion of the planned improvements to the rest of Burbank Avenue, pedestrian and bicycle facilities would be adequate.

Site access and circulation is expected to operate acceptably.

A left-turn lane would not be warranted on Burbank Avenue at either new street connection created by the project.

The Peak-hour Volume Warrant indicating potential need for a traffic signal is met under Baseline and Baseline Plus Project volumes during both the AM and PM peak-hours at Hearn Avenue/Burbank Avenue. The need for a traffic signal is identified in the Specific Plan.

All-way stop-controls are not warranted at the intersection of Hughes Avenue/Burbank Avenue under any scenario evaluated.

The proposed parking supply satisfies City requirements. Bicycle parking is not necessary because private garages would provide adequate bicycle storage.

However, in compliance with the goals and policies of the Specific Plan, implementation of the following recommended conditions of approval would ensure potential impacts would be reduced to less than significant.

Recommended Conditions of Approval

- TRAF-1** Hearn Avenue/Burbank Avenue is planned to be converted to a signalized intersection in the future. The applicant should pay \$96,000 as a proportional share for the signalization project, as negotiated with City staff.
- TRAF-2** The project should include installation of full frontage improvements consistent with the Santa Rosa Roseland Area/Sebastopol Road Specific Plan, though striping of the pavement to include a bike lane should be deferred until a more continuous facility can be provided.
- TRAF-3** The applicant should request that the City of Santa Rosa consider initiating a CityBus route along Burbank Avenue to serve this developing area.

CONCLUSION

The Burbank Avenue Subdivision Project is the type of project that is intended to benefit from CEQA's exemptions and streamlining processes. Because the density of the project is consistent with the Specific Plan, and the Burbank Avenue Subdivision Project has adopted all applicable Specific Plan requirements and provisions, the preceding analysis, with incorporation of the recommended conditions of approval, project impacts on the subject areas listed above would be considered less than significant.