

RESOLUTION NO.

RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF SANTA ROSA RECOMMENDING TO THE CITY COUNCIL ADOPTION OF FINDINGS OF FACT, MITIGATION MONITORING AND REPORTING PROGRAM AND STATEMENT OF OVERRIDING CONSIDERATIONS FOR THE SOUTHEAST GREENWAY GENERAL PLAN AMENDMENT AND REZONING PROJECT - FILE NUMBERS ST14-003, GPAM19-002 AND REZ19-007

WHEREAS, in 2009, the Southeast Greenway Campaign was formed, which is a community group established to develop an urban Greenway on approximately 57 acres of land owned by the California Department of Transportation (Caltrans) and planned for a future extension of State Highway 12; and

WHEREAS, on October 18, 2011, the Santa Rosa City Council adopted Resolution No. 27995 which included Council Goal 4, Strategic Objective 4: “Acknowledge Southeast Greenway community planning projects”; and

WHEREAS, on April 16, 2013, the Council adopted Resolution No. 28266 reaffirming Council Goal 4, Strategic Objective 3: “Support Efforts of Southeast Greenway Campaign by Monitoring and Providing Information”; and

WHEREAS, on June 17, 2014, the City of Santa Rosa joined the Southeast Greenway Community Partnership by signing a Mutual Letter of Intent. At that time, the Partnership consisted of the City of Santa Rosa, the Sonoma County Water Agency, Sonoma County Regional Parks, the Southeast Greenway Campaign, and LandPaths. As outlined the Mutual Letter of Intent, the initial vision was that the highway land between Summerfield Road and Spring Lake Regional Park would be transferred to the Sonoma County Water Agency and operated/maintained by Sonoma County Regional Parks. The remaining land would be transferred to the City of Santa Rosa and would be operated and maintained by City of Santa Rosa’s Recreation and Parks Department with support from community members and nonprofits; and

WHEREAS, on August 20, 2014, the California Transportation Commission adopted a resolution to rescind the freeway adoption due to lack of operational need, local support and funding, allowing the land to be transferred or sold; and

WHEREAS, in late 2014, the Sonoma Land Trust joined the Southeast Greenway Community Partnership and is contributing expertise and effort toward facilitating the future transfer of the Caltrans land to public ownership; and

WHEREAS, on July 7, 2015, the Council adopted Resolution No. 28666 approving a Memorandum of Understanding (MOU) between Caltrans, Sonoma Land Trust, and the Southeast Greenway Community Partnership. The MOU documents how the Partnership, Sonoma Land Trust, and Caltrans will collaborate and work together toward development of an

agreement that will transfer the highway land to public ownership; and

WHEREAS, the MOU states that the City of Santa Rosa would develop an Existing Conditions, Opportunities and Constraints Report to document existing conditions on the property and opportunities and constraints resulting from existing adopted plans. This report was completed and presented to the City Council on October 6, 2015; and

WHEREAS, on October 6, 2015, the Council considered the information contained in the Existing Conditions, Opportunities and Constraints Report and adopted Resolution No. 28696, initiating a General Plan Amendment and Rezoning of the site, along with development of an Environmental Impact Report (EIR); and

WHEREAS, on June 14, 2016, the Council approved a Professional Services Agreement with PlaceWorks, Inc. for preparation of the General Plan Amendment, Rezoning, and EIR for the 57-acre site; and

WHEREAS, on August 6, 2016, the first community workshop was held, with participants envisioning desired uses on the site; and

WHEREAS, on October 8, 2016, the second community workshop was held for participants to consider and provide feedback regarding draft guiding principles and three land use and circulation alternatives; and

WHEREAS, on November 1, 2016, a joint meeting of the Planning Commission and City Council was held to review the draft guiding principles, land use and circulation concept alternatives, and results from the public outreach effort. At the meeting, the Council and Commission directed staff to create a single draft land use and circulation concept alternative; and

WHEREAS, on March 28, 2017, a second joint meeting of the Planning Commission and City Council was held to receive feedback on the single preferred land use and circulation alternative and proposed General Plan amendment; and

WHEREAS, on April 24, 2017, a Notice of Preparation (NOP) of an Environmental Impact Report was mailed to properties within 500 feet of the project area, and was distributed for a 30-day public review period, ending on May 23, 2017, to State agencies and other local and regional agencies, departments and individuals that requested notification; and

WHEREAS, on May 15, 2017, a Scoping Meeting was held at the Bennett Valley Senior Center to gather comments and guidance on the scope and content of the EIR from the community, interested public agencies, and organizations; and

WHEREAS, a notice of availability of the 2017 Draft EIR was provided and the 2017 Draft EIR was made available to the public for review and comment for a period of 45 days beginning on August 21, 2017 and ending on October 4, 2017; and

WHEREAS, on September 14, 2017 the Planning Commission held a noticed public hearing regarding the Southeast Greenway General Plan Amendment and Rezoning project (Project) and 2017 Draft EIR at which time all persons wishing to be heard were invited to speak or submit written comment; and

WHEREAS, during the public review period for the 2017 Draft EIR, the City received public comments requesting additional traffic analysis to address future conditions without the Farmers Lane Extension (if the roadway extension is not completed prior to the Southeast Greenway project). Following the October 4, 2017 closing of the public review period, staff and the consultant team began work on preparing the additional traffic analysis; and

WHEREAS, on October 8, 2017, and continuing for days thereafter, a series of wildfires burned over 90,000 acres in Sonoma County and damaged or destroyed approximately 3,000 homes and 100 commercial structures within the City of Santa Rosa. Due to the impact on City staff resources related to the fires, as well as staff's work on the Council's existing priorities, most notably implementation of the City's Housing Action Plan, work on the Southeast Greenway project was put on hold; and

WHEREAS, in November 2018, with much of the policy work related to the wildfires complete and significant progress made towards the Housing Action Plan initiatives, staff redirected time toward completion of the Project, and finalization of the updated traffic analysis; and

WHEREAS, a Revised Draft Environmental Impact Report (Revised Draft EIR) was prepared and sent to the State Clearinghouse for review by State agencies. The Revised Draft EIR was prepared to evaluate a new traffic scenario and any subsequent residual impacts in response to written and verbal comment made during the 45-day public review period for the 2017 Draft EIR. The written and verbal comments requested that additional traffic analysis be conducted to address potential impacts should the Southeast Greenway project be constructed prior to the extension of Farmers Lane. In compliance with Section 15088.5(f) of the CEQA Guidelines, the Draft EIR was revised to include the new traffic scenario and changes to the traffic noise evaluation; and

WHEREAS, a notice of availability of the Revised Draft EIR was provided and the Revised Draft EIR was made available to the public for review and comment for a period of 45 days beginning on January 28, 2019 and ending on March 13, 2019; and

WHEREAS, on February 14, 2019 the Planning Commission held a noticed public hearing regarding the Revised Draft EIR at which time all persons wishing to be heard were invited to speak or submit written comment; and

WHEREAS, on May 23, 2019 at a public meeting of the Planning Commission, the Commission considered the contents of the Final Environmental Impact Report (Final EIR) and its findings, the proposed General Plan and Zoning Amendments and Rezoning for the 57-acre

property located along the right-of-way owned by Caltrans in southeast Santa Rosa, between Farmers Lane/Highway 12 and Spring Lake Regional Park; and

WHEREAS, the Southeast Greenway General Plan Amendment and Rezoning Final EIR identified the following nine significant environmental impacts attributable to the Southeast Greenway General Plan Amendment and Rezoning project (Project) that could not be mitigated to a level of less than significant:

1. Impact AQ-2: Operation of the proposed project could contribute to an existing or projected air quality violation.
2. Impact AQ-3: Future potential development projects associated with the proposed project could cumulatively contribute to the non-attainment designations of the San Francisco Bay Area Air Basin (SFBAAB)
3. Impact AQ-6: Despite implementation of the proposed project policies, criteria air pollutant emissions associated with the proposed project could generate a substantial net increase in emissions that exceeds the Bay Area Air Quality Management District (BAAQMD) regional significance thresholds.
4. Impact TRANS-1a: The Farmers Lane/Highway 12 Eastbound Off-Ramp-Hoen Avenue Frontage Road intersection currently operates unacceptably at Level of Service (LOS) E during the PM peak hour and is projected to continue operating at LOS E upon the addition of project-generated traffic, with increases in delay of approximately 9.6 seconds.
5. Impact TRANS-1b: On Farmers Lane under Future plus Project (With Farmers Lane Extension) conditions, the project is anticipated to cause operation to drop from LOS D to LOS E in the southbound direction during the AM peak hour.
6. Impact TRANS-1c: The Farmers Lane/Fourth Street-Sonoma Highway intersection is projected to operate unacceptably at LOS E during the AM and PM peak hours without the project and with the addition of project traffic would drop to LOS F during the AM peak hour.
7. Impact TRANS-1e: Under the Future plus Project (Without Farmers Lane Extension) scenario, the Farmers Lane/Highway 12 Eastbound Off-Ramp-Hoen Avenue Frontage Road intersection is projected to operate unacceptably at LOS E during the PM peak hour, with the project increasing the intersection's average vehicle delay by 8.0 seconds.
8. Impact TRANS-6b: Adequate pedestrian and bicycle circulation facilities to cross the Highway 12 Westbound On-Ramp cannot be assured, as both of the options in the proposed project for creating this linkage entail modifications to Caltrans facilities that are outside of the City's control.

9. Impact TRANS-6c: Potential development of an at-grade crossing at the Hoen Avenue Frontage Road/Highway 12 Westbound On-Ramp intersection could result in pedestrian safety concerns.

WHEREAS, the California Environmental Quality Act (CEQA) and the State Guidelines thereto, Section 15091, prohibit a public agency from approving or carrying out a project for which an environmental impact report has been completed which identifies one or more significant effects, unless the public agency determines the impacts are acceptable due to overriding concerns as described in Section 15093 and makes one or more of the following written findings for each of those significant effects accompanied by statements of the facts supporting each finding:

- A. Specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the certified Environmental Impact Report; or
- B. Changes or alterations have been required in, or incorporated into the project, which mitigate or avoid the significant environmental effects thereof as identified in the final Environmental Impact Report; or
- C. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the City. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

WHEREAS, CEQA Section 15093 requires the City to balance the benefits of the proposed project against its unavoidable environmental risks in determining whether or not to approve the project; and

WHEREAS, CEQA and the guidelines thereto, Section 15093, require the City, if it allows the occurrence of significant effects identified in the Environmental Impact Report without mitigation, or the findings made above, to state in writing the reasons to support its action based on the Environmental Impact Report and other information in the record; and

WHEREAS, on May 23, 2019 the Planning Commission considered the contents of the Southeast Greenway General Plan Amendment and Rezoning Project Final Environmental Impact Report and its findings, the proposed General Plan Amendments, Zoning Code Amendments and Rezoning, staff reports, oral and written, and testimony and materials presented of all those wishing to be heard on these matters at a public meeting held on this matter.

NOW, THEREFORE, BE IT RESOLVED that the Planning Commission of the City of Santa Rosa recommends that the City Council adopt the Findings of Fact set forth in Exhibit A, attached hereto, which findings are incorporated by this reference, with regard to the potentially significant environmental impacts identified in the Southeast Greenway General Plan Amendment and Rezoning Final EIR.

BE IT FURTHER RESOLVED that the Planning Commission recommends to the City Council adoption of the Southeast Greenway General Plan Amendment and Rezoning Mitigation Monitoring and Reporting Program dated May 6, 2019, as set forth in Exhibit C, which is hereby made part of this Resolution.

BE IT FURTHER RESOLVED that the Planning Commission recommends that the City Council make the following findings for a statement of overriding considerations for the significant environmental effects identified by the Final EIR:

- A. All potentially feasible mitigation measures have been considered to substantially lessen or avoid the project's significant and unavoidable impacts. Where feasible, mitigation measures have been adopted as part of the Project. The imposition of these measures will reduce the identified impacts, but not to a level of less than significant, and it is not feasible to fully mitigate these impacts;
- B. All potentially feasible alternatives to the Project have been considered, and there are no feasible alternatives that would reduce the above significant and unavoidable impacts to a less than significant level.
- C. The Project's impacts discussed above therefore remain significant and unavoidable.
- D. The statements, as set forth in Exhibit B, which is hereby made part of this Resolution, identify the specific reasons why the benefits of the Project outweigh its significant and unavoidable impacts.

BE IT FURTHER RESOLVED that the Planning Commission recommends that the City Council, based on the above findings, determine that the benefits of the subject project outweigh the anticipated significant environmental effects, and such effects would be acceptable.

REGULARLY PASSED AND ADOPTED by the Planning Commission of the City of Santa Rosa on this 23rd day of May, 2019, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

APPROVED: \_\_\_\_\_

CHAIR

ATTEST: \_\_\_\_\_

EXECUTIVE SECRETARY

ATTACHMENTS:

Exhibit A – Findings of Fact

Table A – CEQA Findings of Fact

Exhibit B – Statement of Overring Considerations

Exhibit C – Mitigation Monitoring and Reporting Program dated May 6, 2019

## **EXHIBIT A**

### **FINDINGS OF FACT FOR THE**

### **SOUTHEAST GREENWAY GENERAL PLAN AMENDMENT AND REZONING PROJECT**

#### **I.** **INTRODUCTION**

The City of Santa Rosa ("City"), as lead agency, prepared an Environmental Impact Report ("EIR") for the Southeast Greenway General Plan Amendment and Rezoning Project (the "Project"). In its entirety, the EIR consists of the August 2017 Draft EIR ("Draft EIR" or "DEIR"), the January 2019 Revised Draft EIR ("RDEIR") and the May 2019 Final EIR ("Final EIR" or "FEIR"), (State Clearinghouse No. \_\_\_\_\_).

These findings, as well as the accompanying Statement of Overriding Considerations attached as Exhibit B to City Council Resolution No.\_\_\_\_, have been prepared in accordance with the California Environmental Quality Act ("CEQA") (Cal. Pub. Resources Code § 21000 et seq.) and its implementing guidelines ("CEQA Guidelines") (Cal. Code Regs. Tit. 14, § 15000 et seq.).

#### **II.** **PROJECT DESCRIPTION**

##### **A. Project Location**

The City of Santa Rosa is located approximately 50 miles north of San Francisco in central Sonoma County. Situated on the Santa Rosa Plain, the City is bounded by the foothills of the Sonoma Mountains to the east and Laguna de Santa Rosa to the west. US Highway 101 (Highway 101) and State Route 12 (SR 12) divide the city into quadrants. Highway 101 is the north-south route connecting the San Francisco Bay Area to Mendocino and Humboldt counties to the north. SR 12 runs in an east-west direction, connecting the Sonoma Coast to the Sonoma and Napa Valleys to the east.

The Southeast Greenway area is comprised of approximately 57 acres of land located in southeast Santa Rosa and is currently owned by Caltrans. The Greenway follows a 1.9-mile linear path from Farmers Lane/Highway 12 to Spring Lake Regional Park. The existing uses in the area are described by three subareas below:

##### **West Subarea**

The 18.3-acre West Subarea follows a linear path from Farmers Lane to Wanda Way. The West Subarea is primarily composed of grassland with three creeks, numerous swales, and potential

wetlands. Matanzas Creek is located within this subarea, and there are a number of drainage swales that collect runoff from the property and some adjoining properties. An underground stormwater conduit, called the Spring Creek Diversion is also located along the southern edge of the Greenway, from Franquette Avenue in this subarea to Summerfield Road at the eastern edge of the Central Subarea.

### **Central Subarea**

The 22.6-acre Central Subarea follows a linear path from Wanda Way and Camden Court to Summerfield Road. The Central Subarea is primarily composed of undeveloped land with trees along the perimeter and a remnant walnut orchard on the eastern portion of the site. Sierra Park Creek and Spring Creek, tributaries of Matanzas Creek, flow through this subarea. Informal paths along Sierra Park Creek connect Hoen Avenue to Mayette Avenue. There are a few trees located along Sierra Park Creek and potential swales/wetlands in the area between Yulupa Avenue and Sierra Park Creek. There is dense vegetation including trees and bushes near Summerfield Road where Spring Creek traverses the Central Subarea. The Central Subarea is relatively flat with a slight elevated area comprised of earthen fill between Janet Way and Yulupa Avenue.

### **East Subarea**

The 16.3-acre East Subarea follows a linear path from Summerfield Road to Spring Lake Regional Park. The East Subarea is primarily composed of grassland and rocky outcroppings, oak woodlands, two potential wetlands, and a small remnant walnut orchard. This subarea does not have any creeks, but there are a number of drainage swales that collect runoff from the property and some adjoining properties.

## **B. Overview**

The proposed Southeast Greenway project (project) would establish General Plan land uses and associated zoning districts within a 57-acre area that spans a 1.9-mile linear path from Farmers Lane/Highway 12 to Spring Lake Regional Park. Implementation and adoption of the project would result in new development potential of up to 47.2 acres of parks and recreational uses/open space, 244 multi-family housing units, and 12,000 square-feet of commercial space. No physical changes to the site are proposed at this time; future park master planning and private development of the housing and mixed-use sites will be required to go through their own planning and supplemental environmental review process.

The proposed General Plan text amendment includes changes to three elements: Land Use and Livability, Transportation, and Public Services and Facilities. The text amendments include the addition of new goals and policies specific to the Southeast Greenway area that were designed to implement the Preferred Land Use and Circulation Alternative (identified as the “Illustrative Map”, attached to this report), which came out of the community engagement process. The Illustrative Map would also be included as a figure in the Land Use and Livability Element.

Because the Southeast Greenway area is Caltrans right-of-way planned for a Highway 12

extension, it does not have a General Plan land use designation or zoning district assigned to it. As such, the project includes designation of General Plan land use and zoning districts that would implement the preferences that came out of the outreach process, which are listed below:

- Approximately 47.2 acres located from Matanzas Creek, east to Spring Lake Regional Park (excluding a 1.2-acre site on the west side of Yulupa Avenue):

**Proposed General Plan Land Use** – Parks and Recreation  
**Proposed Zoning District** – Open Space Recreation (OSR)

- 1.2-acre site on the west side of Yulupa Avenue:

**Proposed General Plan Land Use** – Medium High Density Residential (18-30 units per acre) / Retail and Business Services (mixed)  
**Proposed Zoning District** – Neighborhood Commercial (CN)

- 4.7-acre, triangular site at the terminus of Highway 12, bordered by Farmers Lane, Hoen Frontage Road and the Highway 12 on-ramp:

**Proposed General Plan Land Use** – Medium High Density Residential (18-30 units per acre) / Retail and Business Services (mixed)  
**Proposed Zoning District** – General Commercial (CG)

- 3.7-acre site located between Vallejo Street and the Highway 12 on-ramp, on the east side of Farmers Lane:

**Proposed General Plan Land Use** – Medium Density Residential (8-18 units per acre)  
**Proposed Zoning District** – Multi-Family Residential (R-3-18)

The project includes amending the text of the Zoning Code to specifically address uses allowed in the proposed OSR, CN, CG and R-3-18 zoning districts. A number of uses allowed in the aforementioned districts would not conform to the vision of the Greenway that came out of the community engagement process. As a result, in-lieu of creating new zoning districts specific to the Southeast Greenway area, staff is proposing that minor amendments be made to the text of the proposed zoning districts that would apply to the Southeast Greenway only.

### C. **Project Objectives**

As set forth in the DEIR, the primary goal of the proposed project is to establish General Plan land use designations and zoning districts to the Southeast Greenway Area in order to plan for anticipated future uses while sustaining the community's character. Building upon this primary goal, the following project objectives were established through a collaborative process:

- Establish General Plan land use designations and zoning districts for the Southeast Greenway Area in order to plan for anticipated future uses while sustaining the community's character.

- Provide a linear park with park and recreational uses including open space, educational and cultural opportunities, and active and passive recreation for residents and visitors.
- Provide continuous pedestrian, bicycle, and non-motorized transportation connections from Spring Lake Regional Park to Farmers Lane and links to downtown Santa Rosa, surrounding neighborhoods and schools, and the regional trail system.
- Provide opportunities for high-density residential, retail, commercial, and public/institutional land uses.
- Enhance and protect wetlands, wildlife habitat, groundwater and air quality through sustainable development practices.
- Support a walkable and livable neighborhood, promote economic vitality, and encourage social equity.
- Promote public safety and respect the character of adjacent neighborhoods.

Based on its own review of the EIR and other information and testimony received in connection with the Project, the City finds these objectives to be acceptable and persuasive from a public policy standpoint and accords them weight in considering the feasibility of alternatives set forth in the EIR and in invoking overriding considerations in approving the Project. (*See Sierra Club v. County of Napa*, 121 Cal.App.4th 1490, 1507-1508 (2004); *Sequoyah Hills Homeowners Association v. City of Oakland*, 23 Cal. App. 4th 704, 715 (1993) ("*Sequoyah Hills*").)

**D. Discretionary Approvals**

Project approval requires the City, as lead agency, as well as certain "responsible agencies," to take discrete planning and regulatory actions to approve the overall Project. Described below are the discretionary actions necessary to fully carry out the Project. In addition to certifying the Final EIR and adopting these Findings and the associated Statement of Overriding Considerations and Mitigation Monitoring and Reporting Program (CEQA requirements), the City itself must take the following actions:

The Project application would require the following discretionary approvals and actions, including:

- General Plan Amendment - City Council
- Rezoning – City Council
- Zoning Text Amendment – City Council

Future activity that could occur following certification of the EIR includes, but is not limited to, the following, provided they are consistent with the General Plan and Zoning Ordinance and comply with CEQA:

- Public and private development project approvals (e.g., tentative maps, variances, use permits).
- Development agreements.
- Funding approval of capital projects.
- Issuance of permits and other approvals necessary for implementation of the proposed project.

### *Responsible and Permitting Agencies*

Responsible and permitting agencies are state and local public agencies, other than the lead agency, that have some authority to carry out or approve a project or that are required to approve a portion of the project for which a lead agency is preparing or has prepared an EIR. A list of responsible and/or permitting agencies is included below. However, this list is not exhaustive and could include other agencies. The DEIR has been designed to provide information to these agencies to assist them in the permitting processes for the proposed project. While CEQA is not binding on federal agencies, and no federal agencies have been identified that would be required to take action on the project, any such agency may use the analysis in this document in order to assist with the preparation of their own analyses required by federal law.

- California Department of Transportation (Caltrans)

### **III. ENVIRONMENTAL REVIEW PROCESS**

In accordance with section 15082 of the CEQA Guidelines, the City prepared a Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") on April 24, 2017.) Pursuant to CEQA Guidelines sections 15023, subdivision (c), and 15087, subdivision (f), the State Clearinghouse in the Office of Planning and Research was responsible for distributing environmental documents to State agencies, departments, boards, and commissions for review and comment. The City followed required procedures with regard to distribution of the appropriate notices and environmental documents to the State Clearinghouse. The State Clearinghouse was obligated to make, and did make, that information available to interested agencies for review and comment. The NOP was received by the State Clearinghouse (SCH # 2017042066) and a 30-day public review period ended on May 23, 2017. The City also held a scoping meeting on May 15, 2017 to receive comments on the NOP. The NOP and all comments received on the NOP are presented in Appendix A of the Draft EIR.

The EIR includes an analysis of the following issue areas:

- |                                 |                                  |
|---------------------------------|----------------------------------|
| • Aesthetics                    | • Land Use and Planning          |
| • Air Quality                   | • Noise                          |
| • Biological Resources          | • Population and Housing         |
| • Cultural and Tribal Resources | • Public Services and Recreation |

- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Transportation and Circulation
- Utilities and Service Systems

The EIR also identified topical areas that were determined not to be significant. An explanation of why each area is determined not to be significant is provided in Section 4 of the DEIR. These topical areas are as follows:

- Agriculture Resources
- Forestry Resources
- Mineral Resources

The City published the Draft EIR (SCH 2017042066) for public and agency review on August 21, 2017. A public review period of 45 days was initially provided on the DEIR, which period ended on October 4, 2017. This period satisfied the requirement for a 45-day public review period as set forth in Section 15105 of the CEQA Guidelines. A public scoping meeting was also held on May 15, 2017.

On September 14, 2017, during the 2017 Draft EIR public review period, a public hearing was conducted with the Planning Commission to receive comments from the Commission and the public on the 2017 Draft EIR and proposed General Plan amendments and Rezoning. During the public review period, the City received public comments requesting additional traffic analysis to address future conditions without the Farmers Lane extension (if the roadway is not complete before the Southeast Greenway project is completed). Following the October 4, 2017 closing of the public review period, staff and the consultant team began work on preparing the additional traffic analysis.

On January 28, 2019, the Revised Draft EIR was released for a 45-day public review period, ending on March 13, 2019.

On February 14, 2019, a public hearing was conducted with the Planning Commission to receive comments from the Commission and the public on the Revised Draft EIR.

The Final EIR was issued for public review on May 6, 2019. In accordance with CEQA Guidelines Section 15088, the Final EIR provided responses to all comments received by the City of Santa Rosa on the Draft EIR and the Revised Draft EIR.

On May 23, 2019, the Planning Commission held a public meeting to consider the proposed Project and Final EIR and recommended that the City Council certify the EIR and adopt the project, findings of fact, statement of overriding considerations and mitigation and monitoring program.

On \_\_\_\_, the City Council held a public meeting to consider the proposed project and Final EIR, findings of fact, statement of overriding considerations and mitigation and monitoring program.

**IV.**  
**RECORD OF PROCEEDINGS**

In accordance with Public Resources Code section 21167.6, subdivision (e), the record of proceedings for the City's decision on the Project includes the following documents:

- The NOP and all other public notices issued by the City in conjunction with the Project;
- All comments submitted by agencies or members of the public during the comment period on the NOP;
- The Draft EIR for the Project and all appendices;
- All comments submitted by agencies or members of the public during the comment period on the Draft EIR;
- The Revised Draft EIR for the Project and all appendices;
- All comments submitted by agencies or members of the public during the comment period on the Revised Draft EIR;
- The Final EIR for the Project, including comments received on the Draft EIR and Revised Draft EIR, responses to those comments, and appendices;
- Documents cited or referenced in the Draft, Revised Draft and Final EIRs;
- The Mitigation Monitoring and Reporting Program for the Project;
- All findings and resolutions adopted by the City Council in connection with the Project and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the City, consultants to the City, or responsible or trustee agencies with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the Project;
- All documents submitted to the City by other public agencies or members of the public in connection with the Project, up through the close of the City Council public hearing on July 9, 2019;
- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by the City in connection with the Project;
- Any documentary or other evidence submitted to the City at such information sessions, public meetings, and public hearings;

- The City of Santa Rosa General Plan and all environmental documents prepared in connection with the adoption of the General Plan;
- The City of Santa Rosa Zoning Ordinance and all other City Code provisions cited in materials prepared by or submitted to the City;
- Any and all resolutions adopted by the City regarding the Project, and all staff reports, analyses, and summaries related to the adoption of those resolutions;
- Matters of common knowledge to the City, including, but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

The official custodian of the record is Jessica Jones, Supervising Planner, City of Santa Rosa, Planning and Economic Development, Room 3, 100 Santa Rosa Avenue, Santa Rosa, CA 95404.

The City Council has relied on all of the documents listed above in reaching its decisions on the proposed project even if not every document was formally presented to the City Council or City Staff as part of the City files generated in connection with the Project. Without exception, any documents set forth above not found in the Project files fall into one of two categories. Many of them reflect prior planning or legislative decisions of which the City Council was aware in approving the Project. (See *City of Santa Cruz v. Local Agency Formation Commission* (1978) 76 Cal.App.3d 381, 391-391; *Dominey v. Department of Personnel Administration* (1988) 205 Cal.App.3d 729, 738, fn. 6.) Other documents influenced the expert advice provided to City Staff or consultants, who then provided advice to the City Council as final decisionmakers. For that reason, such documents form part of the underlying factual basis for the City Council's decisions relating to approval of the Project. (See Pub. Resources Code, § 21167.6, subd. (e)(10); *Browning-Ferris Industries v. City Council of City of San Jose* (1986) 181 Cal.App.3d 852, 866; *Stanislaus Audubon Society, Inc. v. County of Stanislaus* (1995) 33 Cal.App.4th 144, 153, 155.)

## V.

### **FINDINGS REQUIRED UNDER CEQA**

Public Resources Code section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The same statute provides that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of Projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." Section 21002 goes on to provide that "in the event [that] specific economic, social, or other

conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in Public Resources Code section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. For each significant environmental effect identified in an EIR for a Project, the approving agency must issue a written finding reaching one or more of three permissible conclusions. The first such finding is that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. The second permissible finding is that such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. The third potential conclusion is that specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. (CEQA Guidelines, § 15091.)

As explained elsewhere in these findings, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors. The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 (*City of Del Mar*); *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1506-1509 [court upholds CEQA findings rejecting alternatives in reliance on applicant's project objectives]; see also *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001 (CNPS) ["an alternative 'may be found infeasible on the ground it is inconsistent with the project objectives as long as the finding is supported by substantial evidence in the record'"] (quoting *Kostka & Zischke, Practice Under the Cal. Environmental Quality Act* [Cont.Ed.Bar 2d ed. 2009] (*Kostka*), § 17.39, p. 825); *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165, 1166 (*Bay-Delta*) ["[i]n the CALFED program, feasibility is strongly linked to achievement of each of the primary project objectives"; "a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal".]) Moreover, "'feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 (*City of Del Mar*); see also *CNPS, supra*, 177 Cal.App.4th at p. 1001 ["an alternative that 'is impractical or undesirable from a policy standpoint' may be rejected as infeasible"] [quoting *Kostka, supra*, § 17.29, p. 824]; *San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 17.)

For purposes of these findings (including the Mitigation Monitoring and Reporting Program and the attached Table A to these findings), the term "avoid" refers to the effectiveness of one or more mitigation measures to reduce an otherwise significant effect to a less than significant level. In contrast, the term "substantially lessen" refers to the effectiveness of such measure or measures to substantially reduce the severity of a significant effect, but not to reduce that effect to a less than significant level.

CEQA requires that the lead agency adopt feasible mitigation measures or, in some instances, feasible alternatives to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modification or alternatives are not required, however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency. (CEQA Guidelines, § 15091, subd. (a), (b).)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons that the agency found the project's benefits outweigh its unavoidable adverse environmental effects. (CEQA Guidelines, §§ 15093, 15043, subd. (b); see also Pub. Resources Code, § 21081, subd. (b).) The California Supreme Court has stated, “[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced.” (*Goleta II*, *supra*, 52 Cal.3d at p. 576.)

The City of Santa Rosa's Statement of Overriding Considerations for the Project is included in Exhibit B to City Council Resolution No. \_\_\_\_.

## VI.

### **LEGAL EFFECT OF FINDINGS**

These findings constitute the City's best efforts to set forth the evidentiary and policy bases for its decision to approve the Project in a manner consistent with the requirements of CEQA. To the extent that these findings conclude that various mitigation measures outlined in the FEIR are feasible and have not been modified, superseded or withdrawn, the City hereby binds itself to implement these measures. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the City adopts a resolution approving the Project.

## VII.

### **MITIGATION MONITORING AND REPORTING PROGRAM**

A Mitigation Monitoring and Reporting Program has been prepared for the Project and is being approved by the same Resolution that has adopted these findings. The City will use the Mitigation Monitoring and Reporting Program to track compliance with Project mitigation measures. The Mitigation Monitoring and Reporting Program will remain available for public review during the compliance period. The final Mitigation Monitoring and Reporting Program is attached to and incorporated into the environmental document approval resolution and is approved in conjunction with certification of the EIR and adoption of these Findings of Fact.

**VIII.**  
**SIGNIFICANT EFFECTS AND MITIGATION MEASURES**

The Draft EIR and Revised Draft EIR identified a number of significant and potentially significant environmental effects (or impacts) that the Project will cause or to which it will contribute. Most of these significant effects can be fully avoided through the adoption of feasible mitigation measures. Other effects, however, cannot be avoided by the adoption of feasible mitigation measures or alternatives, and thus will be significant and unavoidable. Some of these unavoidable significant effects can be substantially lessened by the adoption of feasible mitigation measures. Other significant, unavoidable effects cannot be substantially lessened or avoided. For reasons set forth in the Statement of Overriding Considerations attached as Exhibit B to the City Council Resolution No.\_\_\_\_, adopted concurrently herewith, the City Council has determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the Project.

The City Council's findings with respect to the Project's significant effects and mitigation measures are set forth in "Table A" attached to these findings. The findings set forth in Table A are hereby incorporated by reference.

Table A does not attempt to describe the full analysis of each environmental impact contained in the Final EIR. Instead, the Table provides a summary description of each impact, describes the applicable mitigation measures identified in the Draft, Revised Draft or Final EIR and adopted by the City Council, and states the City Council's findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Draft, Revised Draft and Final EIRs, and these findings hereby incorporate by reference the discussion and analysis in those documents supporting the Final EIR's determinations regarding the Project's impacts and mitigation measures designed to address those impacts. In addition, the Planning Commission and City Council Staff Reports for certification or recommendation on certification of the EIR and approval or recommendation on approval of the Project's entitlements, and City Council Resolution No.\_\_\_\_ and Planning Commission Resolution No. \_\_\_\_ include discussions supporting the Final EIR's determinations; therefore, those documents are hereby incorporated by reference into these findings. In making these findings, the City Council ratifies, adopts, and incorporates into these findings the analysis and explanation in the Draft, Revised Draft and Final EIRs, the Planning Commission and City Council Staff Reports for certification of the EIR and approval of the Project's entitlements, and Resolution No. \_\_\_\_ and Planning Commission Resolution No. \_\_\_\_ and ratifies, adopts, and incorporates in these findings the determinations and conclusions of the Draft, Revised Draft and Final EIRs, the Planning Commission and City Council Staff Reports for certification of the Project EIR and approval of the Project entitlements, and Resolution No. \_\_\_\_ and Planning Commission Resolution No. \_\_\_\_ relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

In considering specific recommendations from commenters, the City has been cognizant of its legal obligation under CEQA to substantially lessen or avoid significant environmental effects to the extent feasible. The City recognizes, moreover, that comments frequently offer thoughtful suggestions regarding how a commenter believes that a particular mitigation measure can be

modified, or perhaps changed significantly, in order to more effectively, in the commenter's eyes, reduce the severity of environmental effects. The City is also cognizant, however, that the mitigation measures recommended in the Draft and Revised Draft EIRs represent the professional judgment and experience of the City's expert staff and environmental consultants. The City therefore believes that these recommendations should not be lightly altered. Thus, in considering commenters' suggested changes or additions to the mitigation measures as set forth in the Draft and Revised Draft EIRs, the City, in determining whether to accept such suggestions, either in whole or in part, has considered the following factors, among others: (i) whether the suggestion relates to a significant and unavoidable environmental effect of the Project, or instead relates to an effect that can already be mitigated to less than significant levels by proposed mitigation measures in the Draft or Revised Draft EIR; (ii) whether the proposed language represents a clear improvement, from an environmental standpoint, over the draft language that a commenter seeks to replace; (iii) whether the proposed language is sufficiently clear as to be easily understood by those who will implement the mitigation as finally adopted; (iv) whether the language might be too inflexible to allow for pragmatic implementation; (v) whether the suggestions are feasible from an economic, technical, legal, or other standpoint; and (vi) whether the proposed language is consistent with the Project's objectives.

As is often evident from the specific responses given to specific suggestions, City staff and consultants spent large amounts of time carefully considering and weighing proposed mitigation language. In some instances, the City developed alternative language addressing the same issue that was of concern to a commenter. In no instance, however, did the City fail to take seriously a suggestion made by a commenter or fail to appreciate the sincere effort that went into the formulation of suggestions.

## **IX.** **PROJECT ALTERNATIVES**

### **A. Basis for Alternatives-Feasibility Analysis**

#### **1. Significant, Unavoidable Impacts of the Project**

All of the potential environmental impacts associated with adoption and implementation of the proposed project were found to be either *less than significant* without mitigation or *less than significant with mitigation*, with the exception of three impacts associated with air quality and six impacts associated with transportation and circulation, which were found to be *significant and unavoidable with mitigation measures*.

Under CEQA, where a significant impact can be substantially lessened (i.e., mitigated to an "acceptable level") solely by the adoption of mitigation measures, the agency, in drafting its findings, has no obligation to consider the feasibility of alternatives with respect to that impact, even if an alternative would mitigate the impact to a greater degree than the proposed project. (Cal. Pub. Resources Code, § 21002; *Laurel Hills Homeowners Association v. City Council*, 83 Cal.App.3d 515, 521 (1978) ("*Laurel Hills*"); *see also Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692, 730-731 (1990); *Laurel Heights Improvement Association v. Regents of the University of California*, 47 Cal.3d 376, 400-403 (1988).)

## 2. Scope of Necessary Findings and Considerations for Project Alternatives

As noted above, these findings address whether the various alternatives substantially lessen or avoid any of the significant unavoidable impacts associated with the Project and (though not legally necessary) also consider the feasibility of each alternative. Under CEQA, "(f)feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (CEQA Guidelines § 15364.) As explained earlier, the concept of feasibility permits agency decision makers to consider the extent to which an alternative is able to meet some or all of a project's objectives. In addition, the definition of feasibility encompasses "desirability" to the extent that an agency's determination of infeasibility represents a reasonable balancing of competing economic, environmental, social, and technological factors supported by substantial evidence.

In identifying potentially feasible alternatives to the Project, the following Project objectives were considered:

- Establish General Plan land use designations and zoning districts for the Southeast Greenway Area in order to plan for anticipated future uses while sustaining the community's character.
- Provide a linear park with park and recreational uses including open space, educational and cultural opportunities, and active and passive recreation for residents and visitors.
- Provide continuous pedestrian, bicycle, and non-motorized transportation connections from Spring Lake Regional Park to Farmers Lane and links to downtown Santa Rosa, surrounding neighborhoods and schools, and the regional trail system.
- Provide opportunities for high-density residential, retail, commercial, and public/institutional land uses.
- Enhance and protect wetlands, wildlife habitat, groundwater and air quality through sustainable development practices.
- Support a walkable and livable neighborhood, promote economic vitality, and encourage social equity.
- Promote public safety and respect the character of adjacent neighborhoods.

Under CEQA Guidelines section 15126.6, as noted earlier, the alternatives to be discussed in detail in an EIR should be able to "feasibly attain most of the basic objectives of the project[.]" For this reason, the objectives described above provided the framework for evaluating possible alternatives.

The Draft EIR Alternatives to the Proposed Project evaluated four Project alternatives in accordance with the parameters set forth by CEQA Guidelines Section 15126.6. In addition, three other alternatives were initially considered but ultimately rejected from further consideration: Minimal Footprint Alternative, Active to Tranquil Alternative, and Nodes of Facility Alternative. All alternatives were initially evaluated on their ability to meet Project objectives, feasibility, and

whether they would avoid or substantially reduce the proposed Project’s significant environmental impacts. Based on this initial evaluation, the No Project, No Commercial/Residential Development, No Commercial Development and Reduced Residential Development alternatives were identified as warranting detailed analysis, while the Minimal Footprint Alternative, Active to Tranquil Alternative, and Nodes of Facility Alternative alternatives were objected because they did not meet the most basic project objectives.

Based on the requirements of CEQA Guidelines §15126.6, the Project objectives, and the rejection of an alternative location for the above reasons, the following alternatives to the Project were identified:

- No Project Alternative,
- No Commercial/Residential Development Alternative,
- No Commercial Development Alternative,
- Reduced Residential Development Alternative.

The City Council finds that the range of alternatives studied in the EIR reflects a reasonable attempt to identify and evaluate various types of alternatives that would potentially be capable of reducing the Project's environmental effects, while accomplishing most but not all of the Project's objectives. The City Council finds that the alternatives analysis is sufficient to inform the City Council and the public regarding the tradeoffs between the degree to which alternatives to the Project could reduce environmental impacts and the corresponding degree to which the alternatives would hinder the Applicants' ability to achieve their Project objectives.

**B. Analysis of Project Alternatives**

The Draft EIR identified and compared environmental effects of the four alternatives listed below with environmental impacts resulting from the Project.

1. **No Project Alternative**

(a) **Description**

Pursuant to CEQA Guidelines Section 15126.6(e)(1), the No Project Alternative is required as part of the “reasonable range of alternatives” to allow decision makers to compare the impacts of approving the proposed project with the impacts of taking no action or not approving the proposed project. Under this alternative, the proposed project would not be constructed, and the project site would remain in its current condition.

The Southeast Greenway Area is comprised of approximately 57 acres of land located in southeast Santa Rosa and is currently owned by the California Department of Transportation (Caltrans). Under the No Project Alternative, Caltrans would retain ownership of the project site and the area would remain closed to the public. Accordingly, the project site does not currently have a General Plan land use designation and the zoning districts are preliminary or “remnant” zoning

districts that do not authorize specific land uses.

(b) **Analysis of the No Project Alternative's Ability to Reduce Significant Unavoidable Project Impacts**

Because no conditions would change as a result of selecting the No Project Alternative, the overall impacts under all the environmental topic areas would be *less* than those of the proposed project.

(c) **Analysis of the No Project Alternative's Ability to Meet the Project Objectives**

Under the No Project Alternative, the proposed project would not be constructed and therefore, this alternative does not meet any of the project objectives.

In summary, the No Project Alternative would avoid the proposed Project's significant unavoidable impacts, but would not advance any of the Project objectives.

(d) **Feasibility of the No Project Alternative**

Because the No Project alternative would not meet the Project objectives, and because the No Project alternative would not provide the same benefits as the proposed Project, it is not a feasible alternative.

2. **No Commercial/Residential Alternative**

(a) **Description**

Under the No Commercial/Residential Alternative, the entire 57-acre project site would be developed with public park and recreational uses including open space, which represents a 9.8 acre increase in park and recreational uses from that of the proposed project. The proposed Park and Recreation land use designation could include the following land uses: greenway, public plaza, natural open space, creek restoration, school facilities, community gathering place, and urban agriculture. The proposed Circulation Concept would also be implemented under the No Commercial/Residential Alternative, and would introduce multi-modal access points, crossings, and connections throughout the Southeast Greenway Area. In addition, under this alternative, the General Plan 2035 would be amended to include land use and conforming zoning districts to allow future development of public park and recreational uses including open space on the project site. This alternative would not introduce new residents or employees to the project site.

(b) **Analysis of the No Commercial/Residential Alternative's Ability to Reduce Significant Unavoidable Project Impacts**

Because no residential or commercial development would occur as a result of selecting the No Commercial/Residential Alternative, impacts under most of the environmental topic areas would

be *less* than those of the proposed project with the exception of cultural and Tribal Cultural Resources, land use and planning, and transportation and circulation.

Under this alternative, the area of ground disturbance would be similar under both the No Commercial/Residential Alternative and the proposed project; therefore, impacts to unknown cultural and Tribal Cultural Resources would be similar. For land use and planning, development under both scenarios would be required to comply with the existing regulations and plans for the City of Santa Rosa; thus, impacts would be similar. With respect to transportation and circulation, both scenarios would generate trips that would impact the already impacted Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), which currently operates unacceptably at LOS E during the PM peak hour. For these reasons, impacts under these three topic areas were found to have *similar* impacts to those of the proposed project.

(c) **Analysis of the No Commercial/Residential Alternative's Ability to Meet the Project Objectives**

The No Commercial/Residential Alternative would generally comply with the project objectives by providing a 57-acre linear park with park and recreational uses, including open space, and multi-modal transportation opportunities. The No Commercial/Residential Alternative would also provide opportunities for the enhancement and protection of biological resources on the project site. However, this alternative would not provide opportunities for high-density residential, retail, and commercial uses. Therefore, this alternative would not meet all of the project objectives.

(d) **Feasibility of No Commercial/Residential Alternative**

The No Commercial/Residential Alternative would not provide any opportunities for high-density residential, retail, commercial, or public/institutional land uses. The City of Santa Rosa is dealing with a housing crisis due to the lack of available affordable residential units. Addressing this crisis has been documented through the City Council's yearly goals and priorities, as well as through the City's 2016 Housing Action Plan. Further, as identified in the Santa Rosa 2035 General Plan, the City seeks to maximize economic opportunities, including ensuring a diverse employment base and providing a variety of goods and services to meet the needs of City residents and businesses. Santa Rosa also seeks to increase employment opportunities while generating the revenues necessary to provide municipal services and facilities (e.g., parks, libraries, police, and fire protection).

For the City to facilitate residential development to accommodate its State-mandated share of regional housing needs, residential development within the City must continue to be allowed, and at higher densities. Commercial development is also needed to provide services and jobs for current and future residents. The proposed Project provides for a mix of residential and commercial development, in a manner that supports transit and encourages alternative transportation modes, minimizing impacts to the greatest extent feasible, while utilizing the remaining area for needed open space and recreational use for the community.

Due to the lack of both residential and non-residential development opportunities with the No Commercial/Residential Alternative, which would preclude the development of new, much needed,

housing opportunities in the southwest area of Santa Rosa, and would exclude the development of retail, commercial and service opportunities for nearby residents, this Alternative would not support a walkable and livable neighborhood, nor would it promote economic vitality, or encourage social equity. Because the No Commercial/Residential Alternative would not provide the same residential development, economic and employment benefits as the proposed Project, it is not a feasible alternative.

### 3. **No Commercial Development Alternative**

#### (a) **Description**

Under the No Commercial Development Alternative, the project site would be developed with 47.2 acres of public parks and recreational land uses, including open space, and 244 multi-family housing units as shown on Figure 3-9 in Chapter 3, Project Description, of the Draft EIR. Because the commercial uses would occur as part of mixed-use development project, the amount of area designated for just residential is the same as that under the proposed project (i.e., 3.7 acres along Vallejo Street, 4.7 acres at the terminus of SR 12, and 1.2 acres west of Yulupa Avenue). Similar to the proposed project the Circulation Concept would also be implemented under the No Commercial Development Alternative. In addition, under this alternative, the General Plan 2035 would be amended to include land use and conforming zoning districts to allow future development of public parks and recreational land uses, including open space, and residential development on the project site. As shown in Table 5-1, the No Commercial Development Alternative would introduce 632 new residents to the Southeast Greenway Area. This alternative would not introduce new employees to the project site.

#### (b) **Analysis of the No Commercial Development Alternative's Ability to Reduce Significant Unavoidable Project Impacts**

Because no commercial development would occur as a result of selecting the No Commercial Alternative, impacts with respect to air quality, GHG emissions, noise, and utilities and service providers would be *less* than those of the proposed project.

Under the No Commercial Alternative, the potential for residential development would still occur on the site; therefore, geological and hazards and hazardous materials related to structures and residential development would be *similar* to those of the proposed project.

The same amount of housing and the same amount of new residents would occur under both the No Commercial Alternative and the proposed project; thus, impacts related to population and housing, and public services and recreation would be *similar* to those of the proposed project.

For land use and planning, future potential development under both scenarios would be required to comply with the existing regulations and plans for the City of Santa Rosa; thus, impacts would be *similar* to those of the proposed project.

With respect to transportation and circulation, both scenarios would generate trips that would impact the already impacted Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road

intersection (#8), which currently operates unacceptably at LOS E during the PM peak hour. Therefore, impacts were found to be *similar* to those of the proposed project.

(c) **Analysis of the No Commercial Alternative's Ability to Meet the Project Objectives**

The No Commercial Development Alternative would generally comply with the project objectives by providing a 47.2-acre linear park with park and recreational uses, multi-family housing, and multi-modal opportunities. The No Commercial Development Alternative would also provide opportunities for the enhancement and protection of biological resources on the project site. However, this alternative would not provide opportunities for retail and commercial uses. Therefore, this alternative would not meet all of the project objectives.

(d) **Feasibility of the No Commercial Alternative**

The No Commercial Alternative would not provide any opportunities for retail, commercial, or public/institutional land uses. As identified in the Santa Rosa 2035 General Plan, the City seeks to maximize economic opportunities, including ensuring a diverse employment base and providing a variety of goods and services to meet the needs of City residents and businesses. Santa Rosa also seeks to increase employment opportunities while generating the revenues necessary to provide municipal services and facilities (e.g., parks, libraries, police, and fire protection).

Commercial development in Santa Rosa is necessary to provide services and jobs for current and future residents within walking distance of residential areas and transit. The proposed Project provides for a mix of residential and commercial development, in a manner that supports transit and encourages alternative transportation modes, minimizing impacts to the greatest extent feasible, while utilizing the remaining area for needed open space and recreational use for the community.

Due to the lack of non-residential development opportunities, which would preclude the development of retail, commercial and service land uses for nearby residents, this Alternative would not support a walkable and livable neighborhood, nor would it promote economic vitality, or encourage social equity. Because the No Commercial Alternative would not provide the same economic and employment benefits as the proposed Project, it is not a feasible alternative.

4. **Reduced Residential Density Alternative**

(a) **Description**

Under the Reduced Residential Density Alternative, the multi-family housing proposed in the Southeast Greenway Area would be reduced by 50 percent, but would be remain in the same areas designated for such uses as that of the proposed project (see Figure 3-9 in Chapter 3, Project Description, of the Draft EIR). These areas include the 3.7-acre parcel along Vallejo Street, 4.7-acre parcel at the terminus of SR 12, and 1.2-acres at the west of Yulupa Avenue. Therefore, this alternative would result in new development potential for 47.2 acres of public parks and recreational land uses including open space, 122 multi-family housing units, and 12,000 square feet of commercial development. Similar to the proposed project, the Circulation Concept would also be

implemented under the Reduced Residential Density Alternative. The General Plan 2035 would also be amended under this alternative to include land use and conforming zoning districts to allow future development of public parks and recreational land uses including open space, multi-family housing, and commercial development on the project site. As shown in Table 5-1, the Reduced Residential Density Alternative would introduce 316 residents and 40 employees to the Southeast Greenway Area.

(b) **Analysis of the Reduced Residential Density Alternative's Ability to Reduce Significant Unavoidable Project Impacts**

Because 50 percent less residential development would occur as a result of selecting the Reduced Residential Density Alternative, impacts with respect to air quality, GHG emissions, noise, population and housing, public services and recreation, and utilities and service providers would be *less* than those of the proposed project.

Because the area of ground disturbance would be similar under both the Reduced Residential Density Alternative and the proposed project, impacts to aesthetics, biological resources, and unknown cultural and Tribal Cultural Resources would be *similar* to those of the proposed project.

Under the Reduced Residential Density Alternative, the potential for residential development would still occur on the site; therefore, geological and hazards and hazardous materials related to structures and residential development would be *similar* under both scenarios.

For land use and planning, future potential development under both scenarios would be required to comply with the existing regulations and plans for the City of Santa Rosa; thus, impacts would be *similar* to those of the proposed project.

With respect to transportation and circulation, both scenarios would generate trips that would impact the already impacted Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), which currently operates unacceptably at LOS E during the PM peak hour. Therefore, impacts were found to be *similar* to those of the proposed project.

(c) **Analysis of the Reduced Residential Density Alternative's Ability to Meet the Project Objectives**

The Reduced Residential Density Alternative would comply with the project objectives by providing a 47.2-acre linear park with open space, multi-family housing, commercial development, and multi-modal opportunities. The Reduced Residential Density Alternative would also provide opportunities for the enhancement and protection of biological resources on the project site. Therefore, this alternative would meet all of the project objectives, but not to the same degree with respect to providing housing to meet the City's housing needs.

(d) **Feasibility of the Reduced Residential Density Alternative**

The Reduced Residential Density Alternative would provide limited opportunities for high-density residential land uses in the project area. Specifically, this alternative is anticipated to provide

approximately 122 new residential units, in contrast with the 244 new high-density residential units anticipated with the proposed Project. The City of Santa Rosa is dealing with a housing crisis due to the lack of available affordable residential units. Addressing this crisis has been documented through the City Council's yearly goals and priorities, as well as through the City's 2016 Housing Action Plan.

For the City to facilitate residential development to accommodate its State-mandated share of regional housing needs, residential development within the City must continue to be allowed, and at higher densities. The proposed Project provides for a mix of residential and commercial development, in a manner that supports transit and encourages alternative transportation modes. The proposed higher-density residential areas maximize the potential housing development in this area, while minimizing impacts to the greatest extent feasible and utilizing the remaining area for needed commercial, open space and recreational use for the community.

While the Reduced Residential Density Alternative would provide opportunities for higher-density residential land uses, it would do so in a limited manner, and not up to the development potential of the proposed Project. With the identified need for affordable housing in Santa Rosa, maximizing the potential for housing development is imperative for the City to meet its housing goals and its State-mandated housing requirements. Because the Reduced Residential Density Alternative would not allow for the same level of high-density residential development opportunities and benefits as the proposed Project, it is not a feasible alternative.

5. **The Environmentally Superior Alternative**

The qualitative environmental effects of each alternative in relation to the proposed Project are summarized in the table below.

**COMPARISON OF IMPACTS FROM PROJECT ALTERNATIVES AND THE PROPOSED PROJECT**

<b>Topic</b>	<b>Proposed Project<sup>a</sup></b>	<b>No Project Alternative</b>	<b>No Commercial/Residential Alternative</b>	<b>No Commercial Development Alternative</b>	<b>Reduced Residential Density Alternative</b>
Aesthetics	LTS	<	<	=	=
Air Quality	SU <sup>b</sup>	<	<	<	<
Biological Resources	LTS/M	<	<	=	=
Cultural and Tribal Cultural Resources	LTS/M	<	=	=	=
Geology and Soils	LTS	<	<	=	=
Greenhouse Gas Emissions	LTS	<	<	<	<
Hazards and Hazardous Materials	LTS	<	<	=	=
Hydrology and Water Quality	LTS	<	<	=	=
Land Use and Planning	LTS	<	=	=	=
Noise	LTS	<	<	<	<
Population and Housing	LTS	<	<	=	<
Public Services and Recreation	LTS	<	<	=	<
Transportation and Circulation	SU <sup>c</sup>	<	=	=	=
Utilities and Service Systems	LTS	<	<	<	<

Notes:

- a: The impacts listed in this column represent the highest significance determination for each respective threshold.
  - b. Indicates an impact at the program-level and does not directly preclude a finding of less than significant at the project-level.
  - c. Represents impacts to which there is no funding to implement measures that could potentially mitigate the impacts; therefore, it is infeasible for the City to implement the measures that would reduce the impact.
- |       |                                       |   |   |
|-------|---------------------------------------|---|---|
| LTS   | Less Than Significant                 | < | Less impact in comparison to the proposed project     |
| LTS/M | Less Than Significant with Mitigation | = | Similar impacts in comparison to the proposed project |
| SU    | Significant and Unavoidable           | > | Greater impact in comparison to the proposed project  |

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least environmental impact. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets project objectives.

As shown in the Table above, the No Project Alternative would, in comparison to the project, result in fewer impacts when compared to those of the proposed project for all of the environmental impacts. It is important to note that with respect to biological resources (restore habitat), land use and planning (division of a community) and public services and recreation (adding new parkland), the No

Project Alternative would not address these issues and improve conditions as would the proposed project. Regardless, because these do not necessarily result in a physical impact on the environment, the No Project Alternative is considered the environmentally superior alternative. However, in accordance with State CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As shown in the above Table, the No Commercial/Residential Alternative would have less impacts related to air quality, aesthetics, biological resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services and recreation, and utilities and service system when compared to the proposed project. Accordingly, when compared to the proposed project, the No Commercial Development Alternative and the Reduced Residential Density Alternative, **the No Commercial/Residential Alternative would be considered the environmentally superior alternative.** However, because this alternative does not include residential or commercial development, it would meet some, but not all of the project objectives.

#### 6. Alternatives Rejected From Further Consideration

Section 15126.6(c) of the State CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency, but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency’s determination. Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in and EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

On October 6, 2015, the City initiated a year-long planning process to identify alternative land uses for the project site. The City met with key stakeholders, held several community workshops, and established a Technical Advisory Committee to identify the community’s vision for the Southeast Greenway Area. Based on the feedback received, the City prepared Draft Guiding Principles and three alternatives for Land Use and Circulation Concepts for the project site. The Draft Guiding Principles focused on establishing a framework for land use planning, design, and development for the Southeast Greenway Area, while the alternatives included various options for connections for non-motorized travel linking Spring Lake Regional Park to Farmers Lane and beyond.

The first alternative, the **Minimal Footprint Alternative**, emphasized parks and recreation and included up to 49.5 acres of park and recreational uses (including open space, habitat restoration/enhancement areas, urban agriculture uses, active and passive recreational uses, school facilities for joint-use recreation and/or outdoor classrooms, and community gathering space), 75 multi-family units, and 20,000 square feet of commercial space.

The second alternative, the **Active to Tranquil Alternative**, emphasized a range of active development uses and a range of tranquil park and recreational uses in the eastern portion near Spring Lake Regional Park. The Active to Tranquil Alternative included up to 42 acres of park and

recreational uses (including open space, habitat restoration/enhancement areas, urban agriculture uses, active and passive recreational uses, school facilities for joint-use recreation and/or outdoor classrooms, and community gathering space), 150 multi-family units, and 22,000 square feet of commercial space (including lodging).

The third alternative, the **Nodes of Activity Alternative**, focused on nodes of housing and retail uses at the major streets and recreational and agricultural activity at the intersections of pathways. The Nodes of Activity Alternative included up to 46 acres of park and recreational uses (including open space, habitat restoration/enhancement areas, urban agriculture uses, active and passive recreational uses, school facilities for joint-use recreation and/or outdoor classrooms, and community gathering space), 120 multi-family units and 24,000 square feet of commercial space.

On November 1, 2016, the City Council and Planning Commission reviewed the Draft Guiding Principles and the three alternatives for Land Use and Circulation Concepts for the project site. The City Council and Planning Commission directed staff to include more housing and merge components of each alternative to create a single Draft Land Use and Circulation Concept alternative which is the preferred alternative that is analyzed in the Draft EIR. Accordingly, the Minimal Footprint Alternative, the Active to Tranquil Alternative, and the Nodes of Activity Alternative were rejected because they did not meet the most basic project objectives.

DRAFT

**CEQA FINDINGS OF FACT, TABLE “A”**  
**SOUTHEAST GREENWAY GENERAL PLAN AMENDMENT AND REZONING PROJECT**  
**CITY OF SANTA ROSA, CALIFORNIA**

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<b>Section 4.1 - Aesthetics</b>			
<p><b>Impact AES-1:</b> Implementation of the proposed project would not have a substantial adverse effect on a scenic vista.</p>	<p>No mitigation is necessary.</p>	<p>Less Than Significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u>  the proposed project includes Land Use and Livability goals and policies that once implemented would further the protection of scenic resources in the Southeast Greenway Area. Land Use and Livability Policy LUL-OO-2, would require the City to work to create a Southeast Greenway gateway on the western edge of the Southeast Greenway Area that offers a prominently visible entrance to park and recreational uses including open space and increases visitor awareness of the amenity. This would provide more publicly accessible views of the surrounding natural hillsides and ridgelines. Land Use and Livability Policy LUL-PP-3, would require the design of all structures, utilities and access roads in the Southeast Greenway to maximize public safety, attractiveness, and compatibility with other uses in the Greenway and surrounding neighborhood. In addition, future development under the proposed project would be</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			required to comply with the General Plan 2035 Urban Design policies (listed above), which seek to preserve existing views within Santa Rosa. The proposed project would also be required to comply with SRCC Section 20-52.030, which requires projects to undergo the City's design review process. (DEIR, p. 4.1-9.)
<p><b>Impact AES-2:</b> Implementation of the proposed project would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.</p>	No mitigation is necessary.	Less Than Significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The General Plan 2035 designates several Santa Rosa roadways as scenic roads throughout the City; however, none or located within or visible from the project site. In addition, the segment of SR 12 within the City of Santa Rosa is not designated as a scenic highway per Caltrans standards. (DEIR, p. 4.1-10.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact AES-3:</b> Implementation of the proposed project would not degrade the existing visual character or quality of the site and its surroundings.</p>	<p>No mitigation is necessary.</p>	<p>Less Than Significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> While implementation of the proposed project would result in a change to the existing visual character of the site itself, potential future development would be limited to a small area of the site. The remainder of the project site would provide a variety of publicly accessible park and recreational amenities, similar to the existing open areas. In addition, implementation of the proposed project would result in the restoration of designated areas where Matanzas Creek, Sierra Park Creek, and Spring Creek traverse the project site consistent with the Citywide Creek Master Plan. (DEIR, p. 4.1-10.)</p>
<p><b>Impact AES-4:</b> Implementation of the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.</p>	<p>No mitigation is necessary.</p>	<p>Less Than Significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> With potential future development of the proposed project, sources of light could be introduced with new buildings and along the park and open areas. Exterior lighting provided on and around the future development would be required to comply with City standards for outdoor lighting that are intended to reduce light pollution and glare per SRCC Chapter 18-</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>16, Chapter 18-42, and Section 20-30.080, which establish maximum height standards for outdoor lighting on private property and require new development to shield and direct lighting fixtures downward and away from adjoining properties to reduce spill-over lighting and light pollution. In addition, the proposed project would also be required to undergo the design review process per SRCC Section 20-52.030. (DEIR, p. 4.1-11.)</p>

DRAFT

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact AES-5:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to aesthetics.</p>	<p>No mitigation is necessary.</p>	<p>Less Than Significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> the SRCC requires projects to undergo the City’s design review process to ensure that project features such as building design, landscaping, site planning, and signage, are consistent with the City’s adopted plans, regulations, and design aesthetics. Moreover, similar to the proposed project, other projects within the Planning Area would be required to be in conformance with General Plan Policies (listed above), which require development to be compatible with the character of their surroundings. The uniform application of these regulations, goals, and policies would ensure that all development within the Planning Area is compatible with its surroundings upon approval. (DEIR, p. 4.1-12.)</p>
<p><b>Section 4.2 - Air Quality</b></p>			
<p><b>Impact AQ-1:</b> Implementation of the proposed project would not conflict with or obstruct implementation of the applicable air quality plan.</p>	<p>No mitigation is necessary.</p>	<p>Less Than Significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Future development allowed by the proposed project would be required to adhere to statewide measures that</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>have been adopted to achieve the GHG reduction targets of Assembly Bill 32. In addition, the proposed project is consistent with regional strategies for infill development identified in <i>Plan Bay Area</i>. Furthermore, the proposed project would not exceed the forecasted year 2035 project-level efficiency metric of 2.4 metric tons of carbon dioxide equivalent per service population (residents plus employees) per year and would be on a trajectory to meet the GHG reduction goal of Executive Order S-03-05. Therefore, the proposed project is consistent with the goal of the 2017 Clean Air Plan to reduce GHG emissions and protect the climate. (DEIR, p. 4.2-23.)</p>
<p><b>Impact AQ-2:</b> Implementation of the proposed project would generate short- and long- term criteria air pollutant emissions that could violate air quality standards or contribute substantially to an existing or projected air quality violation.</p>	<p><u>Short term construction emissions:</u> No mitigation is necessary.</p> <p><u>Long term operational emissions:</u> <b>Mitigation Measure AQ-2:</b> Prior to issuance of construction permits, development project applicants that are subject to CEQA and exceed the screening sizes in the Bay Area Air Quality Management District’s (BAAQMD) CEQA Guidelines shall prepare and submit to the City of Santa Rosa a technical assessment evaluating potential air quality impacts related to the project’s operation phase. The evaluation shall be prepared in conformance with</p>	<p><u>Short term:</u> Less Than Significant</p> <p><u>Long term:</u> Significant and Unavoidable</p>	<p><u>Finding (Short Term Emissions):</u> Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation (Short Term Emissions):</u> Construction emissions associated with individual development projects under the proposed project would increase criteria air pollutants and TACs. Subsequent environmental review of future development projects would be required to assess potential impacts under BAAQMDs project-level thresholds. Construction emissions from buildout of future projects in the Southeast Greenway Area would primarily be 1) exhaust emissions from off-road diesel-powered construction equipment; 2) dust generated by</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>the BAAQMD methodology in assessing air quality impacts. If operation-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in BAAQMD's CEQA Guidelines, the City of Santa Rosa shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operation activities.</p>		<p>demolition, grading, earthmoving, and other construction activities; 3) exhaust emissions from on-road vehicles; and 4) off-gas emissions of ROG's from application of asphalt, paints, and coatings.</p> <p>Existing federal, State, and local regulations, and policies and strategies of the proposed project described throughout this section protect local and regional air quality. Continued compliance with these regulations would reduce construction-related impacts. In addition, General Plan Policy OSC-J-1 would require the City to review all new construction projects and require fugitive dust (PM<sub>10</sub> and PM<sub>2.5</sub>) abatement actions as contained in the current BAAQMD basic control measures for reducing construction emissions of PM<sub>10</sub>. (DEIR, p. 4.2-30.)</p> <p><u>Finding (Long Term Emissions):</u> Implementation of Mitigation Measure AQ-2, which has been required or incorporated into the project, will reduce this impact, but not to a less-than-significant level. The City Council hereby directs that these mitigation measures be adopted. The City Council finds that the environmental effect has been mitigated to the maximum extent feasible, that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p><u>Explanation (Long Term Emissions):</u> Mitigation Measure AQ-2 would require</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>implementation of BAAQMD-approved mitigation measures if subsequent environmental review determines that applicants for future development in Santa Rosa could generate operational emissions in excess of the BAAQMD significance thresholds. An analysis of emissions generated from the operation of potential future projects allowed under the proposed project would be compared to BAAQMD's project-level significance thresholds during individual environmental review. The total criteria air pollutant emissions from operation of potential future development projects associated with the proposed project could be substantial and could contribute to increases in concentrations of air pollutants, which could contribute to ongoing violations of air quality standards. It should be noted that the identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects that comply with BAAQMD screening criteria or meet applicable thresholds of significance. The policies proposed as part of the proposed project would reduce criteria air pollutants, to the extent feasible, as part of this programmatic review of air quality impacts. Additional measures to reduce criteria air pollutant emissions would be considered during individual project-level review based on site-specific and project-specific characteristics to reduce significant impacts as applicable. Because those projects and measures cannot be known at this time, the impact is considered <i>significant and unavoidable</i>. (DEIR, p. 4.2-31.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact AQ-3:</b> Implementation of the proposed project could violate an air quality standard, contribute substantially to an existing or projected air quality violation, and would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).</p>	<p><b>Mitigation Measure AQ-3:</b> Implement Mitigation Measure AQ-2</p>	<p>Significant and Unavoidable</p>	<p><u>Finding:</u> Implementation of Mitigation Measure AQ-2, which has been required or incorporated into the project, will reduce this impact, but not to a less-than-significant level. The City Council hereby directs that these mitigation measures be adopted. The City Council finds that the environmental effect has been mitigated to the maximum extent feasible, that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p><u>Explanation:</u> Mitigation Measure AQ-2 would ensure that future new development under the proposed project would be required to prepare an evaluation of the potential contribution of air quality impacts if the project exceeds the BAAQMD screening thresholds. However, because the emissions are unknown at this time, regional and localized operational emissions could exceed the BAAQMD significance thresholds. As stated under impact discussion AQ-2, the identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects that comply with BAAQMD screening criteria or meet applicable thresholds of significance. Consequently, implementation of the proposed project could cumulatively contribute to the nonattainment designations of the SFBAAB and impacts would be considered <i>significant and unavoidable</i>. (DEIR, p. 4.2-32.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact AQ-4:</b> Construction activities associated with future development projects accommodated under the proposed project could expose sensitive receptors to substantial concentrations of air pollution.</p>	<p><u>Construction Impacts:</u></p> <p><b>Mitigation Measure AQ-4:</b> Applicants for construction within 1,000 feet of residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) in the City of Santa Rosa, as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Santa Rosa prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM<sub>2.5</sub> concentrations exceed 0.3 µg/m<sup>3</sup>, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of</p>	<p><u>Construction:</u> Less Than Significant</p> <p><u>Operational:</u> Less Than Significant</p>	<p><u>Finding (construction impacts):</u> Implementation of Mitigation Measure AQ-4, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigation measures be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p><u>Explanation (Construction impacts):</u> Future construction under the proposed project would temporarily elevate concentrations TACs and diesel-PM<sub>2.5</sub> in the vicinity of sensitive land uses during construction activities. The proposed project involves siting recreational land uses proximate to existing residential units in the vicinity of the project site. Because the details regarding future construction activities are not known at this time—including phasing of future individual projects, construction duration and phasing, and preliminary construction equipment—construction emissions are evaluated qualitatively in accordance with BAAQMDs plan-level guidance. Subsequent environmental review of future development projects would be required to assess potential impacts under BAAQMDs project-level thresholds. Because construction emissions associated with the proposed project could exceed BAAQMD’s project level and cumulative significance thresholds for community risk and hazards, construction-related</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include, but are not limited to:</p> <ul style="list-style-type: none"> <li>▪ During construction, use of construction equipment fitted with Level 3 Diesel Particulate Filters (DPF) for all equipment of 50 horsepower or more.</li> <li>▪ Use of construction equipment fitted with Tier 3 engines for all equipment of 50 horsepower or more.</li> <li>▪ Equipment shall be properly serviced and maintained in accordance with manufacturer recommendations.</li> <li>▪ The construction contractor shall ensure that all non-essential idling of construction equipment is restricted to five minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.</li> </ul> <p>Measures identified in the HRA shall be</p>		<p>health risk impacts associated with the proposed project is considered <i>significant</i>. (DEIR, p. 4.2-32.)</p> <p><u>Finding (operational impact):</u> Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation (operational impacts):</u> Exposure to elevated concentrations of vehicle-generated PM<sub>2.5</sub> and TACs at sensitive land uses have been identified by CARB, the California Air Pollution Control Officer's Association, and BAAQMD as a potential air quality hazard. The proposed project would not create new major sources of TACs, which are more commonly associated with industrial manufacturing or warehousing. Non-residential (e.g., research and development and commercial and retail) land uses may generate small quantities of TACs (e.g., emergency generators, dry cleaners, and gasoline dispensing facilities). However, these small-quantity generators would require review by BAAQMD for permitted sources of air toxics, which would ensure health risks are below the BAAQMD thresholds. Therefore, operation-related health risk impacts associated with the proposed project are considered <i>less than significant</i>. (DEIR, p. 4.2-34.)</p> <p>The proposed project would generate a total of 277 daily peak hour trips and not increase traffic volumes</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>included in the environmental document and/or incorporated into the site development plan as a component of the proposed project. Prior to issuance of any construction permit, the construction contractor shall ensure that all construction plans submitted to the City of Santa Rosa Planning Division and/or Building Division clearly show incorporation of all applicable mitigation measures.</p>		<p>at affected intersections by more than BAAQMD screening criteria of 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited. Therefore, the proposed project would not have the potential to substantially increase CO hotspots at intersections in the Southeast Greenway Area and vicinity. Localized air quality impacts related to mobile-source emissions would therefore be <i>less than significant</i>. (DEIR, p. 4.2-34.)</p>
<p><b>Impact AQ-5:</b> Implementation of the proposed project would not create or expose a substantial number of people to objectionable odors.</p>	<p>No mitigation is necessary.</p>	<p>Less Than Significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The proposed project would accommodate future residential and commercial development. Construction and operation of residential developments, retail, and restaurants would not generate substantial odors or be subject to odors that would affect a substantial number of people. The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			manufacturing facilities. Residential and commercial uses are not associated with foul odors that constitute a public nuisance. (DEIR, p. 4.2-35.)
<p><b>Impact AQ-6:</b> Implementation of the proposed project would cumulatively contribute to air quality impacts in the San Francisco Bay Area Air Basin.</p>	<p><b>Mitigation Measure AQ-6:</b> Implement Mitigation Measures AQ-2 through AQ-4.</p>	<p>Significant and Unavoidable</p>	<p><u>Finding:</u> Implementation of Mitigation Measures AQ-2 through AQ-4, which have been required or incorporated into the project, will reduce this impact, but not to a less-than-significant level. The City Council hereby directs that these mitigation measures be adopted. The City Council finds that the environmental effect has been mitigated to the maximum extent feasible, that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p><u>Explanation:</u> Criteria air pollutant emissions generated by land uses allowed under the proposed project could exceed the BAAQMD thresholds (see Impact AQ-2). Air quality impacts identified in the discussion under impact discussion AQ-2 constitute the proposed project's contribution to cumulative air quality impacts in the SFBAAB. Mitigation Measures AQ-2 through AQ-4, identified previously to reduce project-related emissions, would reduce impacts to the extent feasible. Due to the programmatic nature of the proposed project, site-specific details of potential future development are unknown and no additional mitigation measures are available. Air pollutant emissions associated with the proposed project would result in a cumulatively considerable contribution to air quality</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			impacts; however, identification of this program-level impact does not preclude the finding of less-than-significant impacts for individual subsequent projects. (DEIR, p. 4.2-36.)
<b>Section 4.3 - Biological Resources</b>			
<p><b>Impact BIO-1:</b> Implementation of the proposed project could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans policies or regulations by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.</p> <p><b>Impact Bio-1a:</b> Proposed development could potentially result in an inadvertent take of individual California red-legged frog (CLRF) in the remote instance that individuals were to disperse onto the site in the future, in which case this could result in a potential violation of the federal and California Endangered Species Acts if adequate controls and</p>	<p><b>Mitigation Measure BIO-1a: Ensure Avoidance of California Red-legged Frog.</b> The following measures shall be implemented in locations within 100 feet of any drainage or seasonal wetland on the site to ensure avoidance of individual California red-legged frog (CRLF) in the remote instance individuals were to disperse onto the site in the future in advance of or during construction:</p> <ul style="list-style-type: none"> <li>▪ <i>Wildlife exclusion fence:</i> Wildlife exclusion fencing shall be installed prior to the start of construction and maintained until construction of the proposed project is complete. Such fencing shall, at a minimum, run along the proposed project boundaries with riparian habitat and for a distance of at least 100 feet perpendicular to riparian habitat. Silt fence material may be used to also provide erosion control, however, per</li> </ul>	Less than significant	<p><u>Finding:</u> Implementation of Mitigation Measures BIO-1a, BIO-1b and BIO-1c, which have been required or incorporated into the project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigation measures be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p><u>Explanation:</u> Suitable habitat for special-status species known or suspected to occur in the vicinity is generally absent from the site and no impacts are anticipated for most special-status species. This includes absence of suitable habitat for CRLF, among other special-status species. Although considered highly unlikely, there remains a remote potential for an individual CRLF to disperse onto the site in the future, which could be injured or killed during construction unless construction restrictions are implemented. (DEIR, p. 4.3-20.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p>preconstruction surveys are not implemented.</p> <p><b>Impact Bio-1b:</b> Project implementation could potentially result in loss or modifications to special-status plant species if present on the site and systematic surveys and adequate avoidance are not implemented.</p> <p><b>Impact Bio-1c:</b> Proposed development could potentially result in inadvertent loss of bird nests in active use, which would conflict with the federal Migratory Bird Treaty Act and CDFW code if adequate controls and preconstruction surveys are not implemented</p>	<p>CRLF standards, it must be at least 42 inches in height (at least 36 inches above ground and buried at least 6 inches below the ground) and stakes must be placed on the inside of the project (side on which work will take place).</p> <ul style="list-style-type: none"> <li>▪ <i>Pre-construction survey:</i> Pre-construction surveys for CRLF shall be conducted prior to initiation of project activities (including fence installation) and within 48 hours of the start of ground disturbance activities following completion of exclusion fence installation. Surveys are to be conducted by qualified biologists with experience surveying for CRLF.</li> </ul> <p>If project activities are stopped for greater than 7 days, a follow-up pre-construction survey may be required within 48 hours prior to reinitiating project activities.</p> <ul style="list-style-type: none"> <li>▪ <i>Worker Training:</i> All workers for activities within 100 feet of riparian habitat shall be trained by the qualified biologist to understand the remote potential for</li> </ul>		<p>Although the potential for special-status plant species is considered unlikely or very low, there remains a remote possibility that one or more occurrences occur in the more natural hillside areas east of Summerfield Road. If present, the occurrence(s) could be inadvertently lost as a result of grading, construction of multi-use path trail and other improvements, fire fuel treatment and other vegetation management activities. (DEIR, p. 4.3-21.)</p> <p>In addition, there is a remote possibility that mature trees and areas of dense cover on the site could be used for nesting by raptors and more common bird species. These nests would be protected under the federal MBTA and CDFW code when in active use. The MBTA prohibits killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the USFWS; this prohibition includes whole birds, parts of birds, and bird nests and eggs. Tree removal, vegetation clearing, and other construction activities during the breeding season could result in the incidental loss of fertile eggs or nestlings or nest abandonment if any active nests are present. (DEIR, p. 4.3-23.)</p> <p>Implementation of Mitigation Measures BIO-1a, 1b and 1c will reduce this impact to less than significant.</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>occurrence of this listed species, need to avoid any potential inadvertent take, and process to follow if a frog is encountered, that all work must stop and the qualified biologist must determine whether it is CRLF before work proceeds.</p> <ul style="list-style-type: none"> <li>▪ <i>Earth Disturbing Activities only during dry weather:</i> No earth disturbing activities shall take place during rain events when there is potential for accumulation greater than 0.25 inch in a 24-hour period. In addition, no earth disturbing activities shall occur for 48 hours following rain events in which 0.25 inch of rain accumulation within 24 hours.</li> <li>▪ <i>Biological monitoring:</i> An approved biologist shall be required to inspect and approve installation of the exclusion fence.</li> <li>▪ <i>Erosion Control Materials:</i> Tightly woven fiber netting or similar material shall be used for erosion control or other purposes to ensure amphibians do not get trapped. Plastic mono-filament</li> </ul>		

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>netting (erosion control matting), rolled erosion control products, or similar material shall not be used.</p> <p><b>Mitigation Measure BIO-1b:</b> Appropriate measures shall be implemented to ensure adequate avoidance of special-status plant species, if present in the remaining natural areas on the project site east of Summerfield Road. A qualified botanist shall conduct systematic surveys of the portion of the project site east of the Summerfield Road in spring and summer months to confirm absence of any special-status plant species on the site. The survey shall focus on the special-status plant species considered to have a remote probability for occurrence on the project site. The surveys shall be completed and a report of findings submitted to the City before the onset of any initial ground-disturbing activity or construction associated with project implementation.</p> <p>If any special-status plant species are encountered, then any occurrence(s) shall be avoided or potential impacts adequately mitigated as part of potential future project development. The qualified botanist shall develop and</p>		

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>implement a Special-Status Plant Species Mitigation and Monitoring Program (SSPSMMP). The SSPSMMP shall only be required if a listed species or those with a ranking of 1A, 1B or 2 of the California Native Plant Society (CNPS) Inventory are encountered during the preconstruction survey. Potential impacts on any species with a ranking of 3 and 4 of the CNPS Inventory would not be considered significant and no additional mitigation would be required for these species if encountered during the systematic survey(s).</p> <p>The SSPMMP shall be prepared in consultation with the California Department of Fish and Wildlife (CDFW) and shall be approved by the City prior to any initial ground-disturbing activity or construction. The SSPMMP shall be based on the status and vulnerability of the species present, with avoidance of all or a majority of any populations on the site the preferred method of mitigation. Where complete or even partial avoidance of any special-status plant populations on the site is considered infeasible, options for mitigation may include a program to salvage and reestablish the population at</p>		

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>an alternative, suitable location. Details of any salvage and habitat recreation effort shall include the following criteria and performance standards measures may include:</p> <ul style="list-style-type: none"> <li>▪ Collection of seeds during the appropriate developmental stage of the plan.</li> <li>▪ Procedures for sowing techniques appropriate to the life cycle of the plant.</li> <li>▪ Preparation of a maintenance and monitoring plan specific to the environmental conditions necessary for survival of the new population. Maintenance and monitoring shall be provided for a minimum of five years to determine success of re-seeding and habitat creation, and need for additional preservation.</li> <li>▪ Identification of funding sources to provide implementation of the plan in consultation with the qualified plant ecologist, landscape architect, and civil engineer.</li> </ul> <p>In addition, preservation of another existing occurrence of the affected</p>		

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>special-status plant species shall be required if monitoring indicates that the reestablishment efforts have not been successful after five years. The preservation program shall provide for permanent protection of a different existing population in Sonoma County, which is equal or larger in size than that encountered on the site (minimum 1:1 replacement), through land acquisition or use of a conservation easement. Any off-site mitigation lands shall include establishment of a management endowment as necessary to provide for long-term management of the preserved population.</p> <p><b>Mitigation Measure BIO-1c: Ensure Avoidance of Bird Nests in Active Use.</b> Tree removal, landscape grubbing, and building demolition shall be performed in compliance with the Migratory Bird Treaty Act and relevant sections of the California Department of Fish and Wildlife (CDFW) code to avoid loss of nests in active use. This shall be accomplished by scheduling tree removal and landscape grubbing outside of the bird nesting season (which occurs from February 1 to August 31) to avoid possible impacts on nesting birds if new</p>		

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>nests are established in the future. Alternatively, if building demolition, tree removal and landscape grubbing cannot be scheduled during the non-nesting season (September 1 to January 31), a pre-construction nesting survey shall be conducted. The pre-construction nesting survey shall include the following:</p> <ul style="list-style-type: none"> <li>▪ A qualified biologist (Biologist) shall conduct a pre-construction nesting bird (both passerine and raptor) survey within seven calendar days prior to tree removal, landscape grubbing, and/or building demolition.</li> <li>▪ If no nesting birds or active nests are observed, no further action is required and tree removal, landscape grubbing, and building demolition shall occur within seven calendar days of the survey.</li> <li>▪ Another nest survey shall be conducted if more than seven calendar days elapse between the initial nest search and the beginning of tree removal, landscape grubbing, and building demolition.</li> <li>▪ If any active nests are encountered, the Biologist shall determine an appropriate</li> </ul>		

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>disturbance-free buffer zone to be established around the nest location(s) until the young have fledged. Buffer zones vary depending on the species (i.e., typically 75 to 100 feet for passerines and 300 feet for raptors) and other factors such as ongoing disturbance in the vicinity of the nest location. If necessary, the dimensions of the buffer zone shall be determined in consultation with the CDFW.</p> <ul style="list-style-type: none"> <li>▪ Orange construction fencing, flagging, or other marking system shall be installed to delineate the buffer zone around the nest location(s) within which no construction-related equipment or operations shall be permitted. Continued use of existing facilities such as surface parking and site maintenance may continue within this buffer zone.</li> <li>▪ No restrictions on grading or construction activities outside the prescribed buffer zone are required once the zone has been identified and delineated in the field and workers have been properly trained</li> </ul>		

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>to avoid the buffer zone area.</p> <ul style="list-style-type: none"> <li>▪ Construction activities shall be restricted from the buffer zone until the Biologist has determined that young birds have fledged and the buffer zone is no longer needed.</li> <li>▪ A survey report of findings verifying that any young have fledged shall be submitted by the Biologist for review and approval by the City prior to initiation of any tree removal, landscape grubbing, building demolition, and other construction activities within the buffer zone. Following written approval by the City, tree removal, and construction within the nest-buffer zone may proceed.</li> </ul>		
<p><b>Impact BIO-2:</b> Implementation of the proposed project would generally not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Services.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Grading, multi-use paths, and other improvements associated with project implementation would generally be located away from the riparian sensitive natural communities on the site. Direct modification would be limited to multi-use path crossings of Matanzas and Spring creeks. New crossings would</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>presumably be located and designed to minimize tree removal and disturbance to other native cover along these creek corridors where riparian vegetation is relatively well-developed, and for new crossings of Sierra Park Creek and other drainages where woody riparian vegetation is less well-developed. Best management practices , such as source control, and treatment control measures that provide both flow control and treatment to runoff during construction would be implemented to control the potential for construction-generated sediment from reaching these drainages and downstream waters. Further, the exclusionary fencing recommended in Mitigation Measure BIO-1a would ensure that the limits of grading associated with the project are clearly defined, and would prevent any inadvertent disturbance to the riparian corridors on the site. (DEIR, p. 4.3-24.)</p>
<p><b>Impact BIO-3:</b> Implementation of the proposed project could have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption or other means.</p> <p>Potential future development would result in adverse impacts to regulated waters and special-status</p>	<p><b>Mitigation Measure BIO-3: Provide Compensatory Mitigation for Wetland Modifications.</b> The City shall require future project applicants to develop and implement a compensatory mitigation program to provide adequate mitigation for jurisdictional waters affected by proposed improvements in the Southeast Greenway Area for submittal to the City. A jurisdictional wetland delineation shall be prepared by a qualified wetland specialist and submitted for verification by the United</p>	<p>Less than significant</p>	<p><u>Finding:</u> Implementation of Mitigation Measure BIO-3, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p><u>Explanation:</u> Modifications to regulated waters would require appropriate authorizations from federal and State</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p>species within the regulatory waters, and would require appropriate authorizations from regulatory agencies and adequate compensatory mitigation where avoidance is infeasible</p>	<p>States Army Corps of Engineers (USACE) where jurisdictional waters may be affected by project-related improvements. A Wetland Protection and Replacement Program (WPRP) shall be prepared by the qualified wetland specialist and implemented to provide compensatory mitigation at a minimum 2:1 ratio where wetland habitat is affected, shall minimize disturbance to unvegetated waters, and shall be reviewed and approved by appropriate regulatory agencies (e.g., USACE, Regional Water Quality Control Board (RWQCB) and the California Department of Fish and Wildlife (CDFW). The WPRP shall include appropriate implementation measures to prevent inadvertent loss and degradation of jurisdictional waters to be protected, and replacement for those wetland features eliminated or modified as a result of potential future project development. The WPRP shall contain the following components:</p> <ul style="list-style-type: none"> <li>▪ Where verified waters of the United States are present and cannot be avoided, authorization for modifications to these features shall be obtained from regulatory agencies with jurisdiction. This</li> </ul>		<p>regulatory agencies, including the USACE and RWQCB under Section 404 and 401 of the CWA, and CDFW under the Streambed Alteration Agreement program. Further review would be provided by these regulatory agencies where a permit application was formally submitted for authorization of activities within jurisdictional limits. If regulated wetland habitat is affected, a compensatory mitigation program would be required as part of the regulatory agency authorizations. A program to monitor and maintain any created habitat provided as mitigation would be a requirement of the regulatory agency authorizations, ensuring adequate compensatory mitigation and successful establishment of any replacement marshland and adjunct upland vegetation. (DEIR, p. 4.3-25.)</p> <p>With the implementation of Mitigation Measure BIO-3, impacts will be reduced to a less than significant level.</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>includes the USACE through the Section 404 permitting process where waters of the United States are affected by the potential future project development and the RWQCB as part of the Section 401 Certification process. Together with a Streambed Alteration Agreement (SAA) secured from CDFW, if required as part of the SAA Notification process for proposed fills to the man-made ditch and possibly the pond on the golf course. All conditions required as part of the authorizations by the USACE, RWQCB, and CDFW shall be implemented as part of the project.</p> <ul style="list-style-type: none"> <li>▪ Consultation or incidental take permitting may be required under the California and federal Endangered Species Acts. Future project applicants shall obtain all legally required permits or other authorizations from the USFWS, NOAA Fisheries, and CDFW for the potential “take” of protected species under the Endangered Species Acts.</li> </ul>		

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<ul style="list-style-type: none"> <li>▪ Install orange construction fencing around the boundary of all wetland areas and waters to be preserved at the interface with proposed fills and grading so that they are not disturbed during construction. The fencing shall be placed a minimum of 25 feet out from the boundary of the wetlands/waters but may need to be adjusted if restoration activities are to be conducted within this area. Grading, construction, and restoration work within the wetland/waters buffer zones shall be conducted in a way that avoids or minimizes disturbance of existing wetlands and aquatic habitat.</li> <li>▪ A qualified biologist/restoration specialist shall be available during construction to provide situation-specific wetland avoidance measures or planting recommendation, as needed.</li> <li>▪ Success criteria, maintenance and long-term management responsibilities, monitoring requirements, and contingency</li> </ul>		

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>measures in the WPRP should be specified. Monitoring shall be conducted by the qualified wetland specialist for a minimum of five years and continue until the success criteria are met. Permanent monitoring transects shall be established as part of the program and vegetation data collected in the spring and summer months when plant identification is possible. Photo stations shall be established along each monitoring transect, and photographs taken every year during the required monitoring period.</p> <ul style="list-style-type: none"> <li>▪ Annual monitoring reports shall be prepared by the qualified wetland specialist and submitted to resource agency representatives by December 31 of each monitoring year for a minimum of 5 years or until the defined success criteria are met. The annual report shall summarize the results of the monitoring effort, performance standards, and any required contingency measures, and shall include photographs of the monitoring transects and program</li> </ul>		

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	success. Maps shall be included in the monitoring report to show the location of monitoring transects and photo stations.		
<p><b>Impact BIO-4:</b> Implementation of the proposed project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife corridors, or impede the use of native wildlife nursery sites.</p>	No mitigation necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Implementation of the proposed project would not result in any substantial adverse impacts on wildlife movement opportunities or native nurseries. Wildlife in the site vicinity is already acclimated to human activities and the proposed multi-use path and associated uses on the project site would not result in substantial disruption or obstruction of wildlife movement opportunities. Project implementation would result an increase in the frequency and intensity of human activity on the project site, including dogs and other pets. But appropriate controls would be implemented to minimize the potential for harassment of wildlife, including existing leash laws per SRCC Section 7-12.110, Leash Required in Public Park, Playground. (DEIR, p. 4.3-27.)</p>
<p><b>Impact BIO-5:</b> Implementation of the proposed project would not conflict with any local policies or</p>	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
ordinances protecting biological resources, such as a tree preservation policy or ordinance.			<p>§§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Implementation of the proposed project could result in the removal of one or more regulated trees. But any tree removal would be required to comply with the City's tree protection ordinance. Overall, the proposed project would not conflict with any local policies or ordinances protecting biological resources. (DEIR, p. 4.3-27.)</p>
<p><b>Impact BIO-6:</b> Implementation of the proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional or state habitat conservation plan.</p>	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> There are no habitat conservation plans, natural community conservation plans, or other approved local, regional, or State habitat conservation plans that encompasses the project site or its immediate vicinity. The Santa Rosa Plain Conservation Strategy establishes a long-term conservation program to address potential adverse effects on listed species due to future development on the Santa Rosa Plain, but the service area restricted to the west of Highway 101 and does not extend into the vicinity of the project site. Accordingly, there would be <i>no impact</i>. (DEIR, p. 4.3-27.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact BIO-7:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would not result in a significant cumulative impact with respect to biological resources.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Because the footprint of the proposed project lacks any sensitive biological resources, with the exception of the proposed crossing of riparian corridors, and because the identified mitigation measures would reduce any potential biological impacts to a less than significant level, the project would not contribute to any cumulative impacts on special-status species, sensitive natural communities, or regulated wetlands. And the impacts associated with the proposed development would not contribute to a cumulative reduction of important wildlife habitat. (DEIR, p. 4.3-28.)</p>
<p><b>Section 4.4 - Cultural and Tribal Resources</b></p>			
<p><b>Impact CULT-1:</b> Implementation of the proposed project would not cause a substantial adverse change in the significance of a historical resources pursuant to CEQA Guidelines section 15064.5.</p>	<p>No mitigation necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> there are no existing structures on the project site. Additionally, the project site is not located within a historic preservation district nor is it identified as a historic landmark. Therefore, with no historical resources on the project site, there would <i>no impact</i> as a result project implementation. (DEIR, p. 4.4-7.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact CULT-2:</b> Subsurface construction activities associated with the proposed project may damage or destroy previously undiscovered archaeological resources.</p>	<p><b>Mitigation Measure CULT-2:</b> If any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, all work within 50 feet of the resources shall be halted and a qualified archaeologist shall be consulted. If the resource is a tribal resource – whether historic or prehistoric – the City shall consult with the appropriate tribe(s) to evaluate the resource and determine appropriate avoidance, preservation or mitigation measures. If the resource is non-tribal, the archaeologist shall assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, representatives from the City and the archaeologist would meet to determine the appropriate avoidance measures or other appropriate mitigation. All significant non-tribal cultural materials recovered shall be, as necessary and at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. Where the materials are tribal, the City shall consult with the appropriate tribe(s) to determine what types of testing and preservation are</p>	<p>Less than significant</p>	<p><u>Finding:</u> Implementation of Mitigation Measure CULT-2, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p><u>Explanation:</u> Archival research indicated prehistoric and, to a lesser extent, historic-period archeological resources could be found on the project site. Therefore, it is possible that unknown buried archaeological materials could be found during ground-disturbing construction activities, including unrecorded Native American prehistoric archaeological materials. While the General Plan 2035 Historic Preservation policies (listed above) includes direction for the protection of archeological resources, ground-disturbing activities associated with implementation of the proposed project could have the potential to uncover and damage or destroy unknown resources. (DEIR, p. 4.4-8.)</p> <p>The implementation of Mitigation Measure CULT-2 will reduce the impact to a less than significant level.</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>acceptable. In considering any suggested mitigation to mitigate impacts to historical resources or unique archaeological resources, the City, in consultation with the tribe(s) where appropriate, shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, proposed project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) may be instituted. Work may proceed on other parts of the project site while mitigation for tribal cultural resources, historical resources or unique archaeological resources is being carried out.</p>		
<p><b>Impact CULT-3:</b> Implementation of the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature.</p>	<p><b>Mitigation Measure CULT-3:</b> In the event that fossils or fossil-bearing deposits are discovered during construction, excavations within 50 feet of the find shall be temporarily halted or diverted. The contractor shall notify a qualified paleontologist to examine the discovery. The paleontologist shall document the discovery as needed, in accordance with Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology 1995), evaluate the potential resource, and assess the significance of the finding under the</p>	<p>Less than significant</p>	<p><u>Finding:</u> Implementation of Mitigation Measure CULT-3, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p><u>Explanation:</u> although there is no record of paleontological resources on the project site previous research</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important. The plan shall be submitted to the City for review and approval prior to implementation.</p>		<p>indicated that buried prehistoric archaeological resources are likely to be found within or underneath Holocene-age depositional land forms on the project site. While the General Plan 2035 Historic Preservation policies (listed above) includes direction for the protection of archeological resources, including pre-historic deposits, ground-disturbing activities associated with implementation of the proposed project could disturb unrecorded fossils of potential significance and other unique features could exist; thus, resulting in damage to, or destruction of, unknown paleontological resources or unique geological features. (DEIR, p. 4.4-9.)</p> <p>The implementation of Mitigation Measure CULT-3 will reduce the impact to a less than significant level.</p>
<p><b>Impact CULT-4:</b> Implementation of the proposed project would not disturb any human remains, including those interred outside of formal cemeteries.</p>	<p><b>Mitigation Measure CULT-4:</b> Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Sonoma County Coroner shall be notified immediately. The Coroner</p>	<p>Less than significant</p>	<p><u>Finding:</u> Implementation of Mitigation Measure CULT-4, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p><u>Explanation:</u> Human remains associated with pre-contact archaeological deposits could exist on the project site and could be encountered at the time potential future</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies as the Most Likely Descendant (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.</p>		<p>development occurs. The associated ground-disturbing activities, such as site grading and trenching for utilities, have the potential to disturb human remains interred outside of formal cemeteries. Any human remains encountered during ground-disturbing activities are required to be treated in accordance with California Code of Regulations Section 15064.5(e) (CEQA), Public Resources Code Section 5097.98, California Health and Safety Code Section 7050.5, and General Plan 2035 Policy HP-A-5, which state the mandated procedures of conduct following the discovery of human remains. (DEIR, p. 4.4-9.)</p> <p>The implementation of Mitigation Measure CULT-4 will reduce the impact to a less than significant level.</p>
<p><b>Impact CULT-5:</b> Implementation of the proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code sections 21074, 5020.1(k) or 5024.1</p>	<p><b>Mitigation Measure CULT-5a:</b> Implement Mitigation Measure CULT-2</p> <p><b>Mitigation Measure CULT-5b:</b> Implement Mitigation Measure CULT-4</p>	<p>Less than significant</p>	<p><u>Finding:</u> Implementation of Mitigation Measures CULT-5a and CULT-5b, which have been required or incorporated into the project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigation measures be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>that avoid the significant environmental effect, as identified in the Final EIR.</p> <p><u>Explanation:</u> Compliance with existing federal, State, and local laws and regulations, and the General Plan 2035 Historic Preservation policies (listed above), would protect unrecorded TCR's on the project site by providing for the early detection of potential conflicts between development and resource protection, and by preventing or minimizing the material impairment of the ability of archaeological deposits to convey their significance through excavation or preservation. Furthermore, implementation of Mitigation Measures CULT-2 and CULT-4 would reduce any impacts to TCR discovered on the project site as a result implementation of the proposed project. (DEIR, p. 4.4-10.)</p>
<p><b>Impact CULT-6:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to cultural resources.</p>	<p><b>Mitigation Measure CULT-6:</b> Implement Mitigation Measures CULT-2, CULT-3, CULT-4, and CULT-5.</p>	<p>Less than significant</p>	<p><u>Finding:</u> Implementation of Mitigation Measure CULT-6, which has been required or incorporated into the project, will reduce this impact to a less-than-significant level. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p><u>Explanation:</u> Future development under the proposed project, in</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>conjunction with development on lands within the Planning Area, has the potential to cumulatively impact cultural resources including archaeological and paleontological deposits, human remains, and TCRs. As previously discussed, there are no structures on the project site; thus implementation of the proposed project would result in no impact to historic architectural resources. Impacts to archaeological resources, paleontological resources, human remains, or TCRs identified within the project site and implementation of Mitigation Measures CULT-2, CULT-3, CULT-4, and CULT-5 would reduce these impacts to a <i>less-than-significant</i> level; implementation of the proposed project would not create or contribute to a cumulative impact on cultural resources. (DEIR, p. 4.4-11.)</p>
<b>Section 4.5 – Geology and Soils</b>			
<p><b>Impact GEO-1:</b> Implementation of the proposed project would not result in substantial soil erosion or the loss of topsoil</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Substantial soil erosion or loss of topsoil during development could, in principle, undermine structures and slopes in the Southeast Greenway Area. Adherence to existing regulatory requirements would ensure that the impacts associated with substantial erosion or the loss of topsoil resulting from development of the Southeast Greenway Area would</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			be <i>less than significant</i> . (DEIR, p. 4.5-9.)
<p><b>Impact GEO-2:</b> Implementation of the proposed project would not result in a significant impact related to development on unstable geologic units and soils or result in on- or off-site landsliding, lateral spreading, subsidence, liquefaction or collapse.</p>	<p>No mitigation necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation</u> the potential for landslides is judged low in light of the essentially flat topography. Furthermore, existing developments in the immediate vicinity of the Plan Area, constructed on sites typified by similar topography and underlying geology, have not experienced landslides, lateral spreading, subsidence, liquefaction, or collapse. Given this experience, development of the Southeast Greenway Area is unlikely to result in significant adverse impacts related to unstable geologic units or soil. (DEIR, p. 4.5-10.)</p>
<p><b>Impact GEO-3:</b> Implementation of the proposed project would not create substantial risks to property as a result of its location on expansive soil, as defined by Section 1803.5.3 of the California Building Code.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The adverse effects of expansive soils can be avoided through proper subsoil preparation, drainage, and foundation design. In order to design a suitable foundation, expansive soils need to be recognized through appropriate sampling and soils testing. Such testing is generally part of a detailed, design-level</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			geotechnical investigation performed prior to construction. Procedures employed in expansive soils testing are found in many codes and regulations. For example, Chapter 18, Sections 1803.5.3. and 1808.6 of the CBC set forth investigation and foundation requirements related to expansive soils. (DEIR, p. 4.5-10.)
<p><b>Impact GEO-4:</b> Implementation of the proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.</p>	No mitigation required.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Future development within the Southeast Greenway Area would not require the use of septic tanks or alternative waste water disposal systems. Wastewater would be discharged into the existing public sanitary sewer system in the Plan Area, which is serviced by Santa Rosa Water, a public utility that provides wastewater collection and conveyance services to the city's residents. Over 500 miles of underground pipes bring this wastewater to the Laguna Treatment Plant located at 4300 Llano Road on the southwest edge of the City of Santa Rosa. As such, there would be <i>no impact</i> from implementation of the proposed project at sites where soils might otherwise not be capable of supporting the use of septic tanks or alternative wastewater disposal systems. (DEIR, p. 4.5-11.)</p>
<p><b>Impact GEO-5:</b> Implementation of the proposed project, in</p>	No mitigation necessary.	Less than significant	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub.

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p>combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to geology, soils and seismicity.</p>			<p>Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Any potential future development resulting from implementation of the proposed project or in the surrounding vicinity would be required to meet the latest standards set forth in the CBC. The CBC requirements, along with requirements in the SRCC, ensure that any development on unstable soil or expansive soil is regulated to minimize potential hazards. The SRCC includes requirements for the performance and review of geological investigations prior to the issuance of building permits in a State-designated Alquist-Priolo fault zone. Moreover, in combination with foreseeable development in the surrounding area, implementation of the proposed project would not change the geology or soil characteristics of the project area as a whole. (DEIR, p. 4.5-11.)</p>
<b>Section 4.6 – Greenhouse Gas Emissions</b>			
<p><b>Impact GHG-1:</b> Implementation of the proposed project would not directly or indirectly generate greenhouse gas emissions that would result in an increase in community emissions from baseline conditions that would have a significant impact on the environment.</p>	<p>No mitigation is required.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091)</p> <p><u>Explanation:</u> GHG emissions from construction activities are one-time, short-term emissions and therefore would not significantly contribute to long-term cumulative GHG</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>emissions impacts of the proposed project. One-time, short-term emissions are converted to average annual emissions by amortizing them over the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame, since this is a typical interval before a new building requires the first major renovation. Because construction emissions are a one-time occurrence and would cease at project buildout, GHG emissions impacts of the proposed project would be <i>less than significant</i>. (DEIR, p. 4.6-17.)</p> <p>Implementation of the proposed project would result in a net increase of GHG emissions of 1,056 MTCO<sub>2</sub>e per year and would not exceed BAAQMD's bright-line threshold of 1,100 MTCO<sub>2</sub>e /year/SP. Similarly, as potential future development under the proposed project would generate 1.57 MTCO<sub>2</sub>e/SP/year, it would meet the forecasted efficiency metric of 2.4 MTCO<sub>2</sub>e/SP/year based on the long-term GHG reduction target of SB 32 and trajectory to achieve the long-term reduction goal of Executive Order S-03-05. Average annual emissions per service population are divided by the service population of the proposed project to estimate the proposed project's efficiency at buildout based on the GHG reduction target for the horizon year of the project (2035). Furthermore, compliance with the City's CAP would minimize GHG emissions to the extent feasible to meet the reduction target established under AB 32. Therefore overall, the proposed project's cumulative contribution to the long-term GHG emissions in the State would be considered <i>less than significant</i>. (DEIR, p. 4.6-19.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p>Impact GHG-2: Implementation of the proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.</p>	<p>No mitigation is required</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091)</p> <p><u>Explanation:</u> The proposed project would comply with these GHG emissions reduction measures since they are Statewide strategies. Therefore, the project’s GHG emissions would be reduced from compliance with Statewide measures that have been adopted since AB 32 was adopted. (DEIR, p. 4.6-20.)</p> <p>The proposed project would accommodate infill development projects on the CalTrans right of way within Santa Rosa near existing infrastructure. Additionally, intersection crossings with enhanced signing, striping, and/or signal operations to improve pedestrian/bike travel are proposed at Hoen Avenue and Cypress Way, and at the proposed driveway on Hoen Avenue Frontage Road. Likewise, a number of pedestrian/bicycle connections have been identified to connect to neighborhoods, provide safe routes to school, and to provide access to the Greenway between the cross streets. Numerous access points will facilitate easier pedestrian/bicycle access to the Greenway and allow areas between the roadways to be activated with foot and bicycle traffic. Therefore, the proposed project would not conflict with the land use concept plan in <i>Plan Bay Area</i>. (DEIR, p. 4.6-20.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>The emissions reduction strategies developed by the City follow the BAAQMD's CEQA Guidelines and the corresponding criteria for a Qualified GHG Emissions Reduction Strategy as defined by the BAAQMD, which in turn were developed to comply with the requirements of AB 32 and achieve the goals of the CARB's AB 32 Scoping Plan. The proposed project also incorporates several design elements that would reduce GHG emissions such as conformance to the 2016 Building Energy Efficiency Standards and CALGreen building regulations. The proposed project would be consistent with the applicable measures in the Santa Rosa CAP. (DEIR&lt; p. 4.6-21.)</p>
<p><b>Impact GHG-3:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to GHG emissions.</p>	<p>No mitigation is required.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091</p> <p><u>Explanation:</u> implementation of the proposed project would not exceed BAAQMDs efficiency metric; and therefore, GHG emissions would result in a less than significant impact. (DEIR, p. 4.6-24.)</p>
<p><b>Section 4.7 - Hazards and Hazardous Materials</b></p>			
<p><b>Impact HAZ-1:</b> Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use or</p>	<p>No mitigation is required.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
disposal of hazardous materials.			<p><u>Explanation:</u> Potential future development under the proposed project would not involve the routine transport of hazardous waste, thus, no impacts to the public or the environment would occur. Potential impacts during construction of bike paths, or residential and mixed-used development near Farmers Lane and Yulupa Avenue could include potential spills associated with the use of fuels and lubricants in construction equipment. These potential impacts would be short-term in nature and would be reduced to less-than-significant levels through compliance with applicable local, State, and federal regulations, as well as the use of standard equipment operating practices by experienced, trained personnel. Additionally, during the operational phase of future development, common cleaning and building maintenance substances (i.e., paints and cleaners) and similar items could be stored and used in the proposed residential or mixed-use buildings within the Southeast Greenway Area. These potentially hazardous materials, however, would not be of a type or occur in sufficient quantities to pose a significant hazard to public health and safety or the environment. (DEIR, p. 4.7-12.)</p>
<p><b>Impact HAZ-2:</b> Implementation of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into</p>	No mitigation is required.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091</p> <p><u>Explanation:</u> Operation of future projects could involve the storage</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
the environment.			<p>and use of common cleaning substances, building maintenance products, or paints and solvents in the proposed buildings; however, these potentially hazardous substances would not be of a type or occur in sufficient quantities on-site to pose a significant hazard to public health and safety or the environment. The storage and use of these materials would be subject to existing federal and State regulations. Compliance with these regulations would ensure that the risk of accidents and spills are minimized to the maximum extent practicable. In addition, proposed Land Use and Livability Policy LUL-PP-3 would require the design of all structures, utilities and access roads in the Southeast Greenway to maximize public safety and compatibility with other uses in the Southeast Greenway Area and surrounding neighborhood. (DEIR, p. 4.7-13.)</p>
<p><b>Impact HAZ-3:</b> Implementation of the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant impact.</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Adoption and implementation of the proposed project would provide for habitat restoration and low-impact public recreation (e.g., hiking and cycling) and associated construction of supporting facilities as well as a joint school facility and community gathering place near Montgomery High School, residential and mixed-use development near Farmers Lane, and mixed-use development near Yulupa Avenue. In</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>addition, the proposed project could also result in plazas, playgrounds, community gardens and restored orchards. Construction activities would be subjected to applicable existing regulations that are applicable to hazardous materials use and transport. As described in impact discussion HAZ-1 and HAZ-2, operation of future projects under the proposed project would involve the storage and use of common cleaning substances, building maintenance products, paints and solvents in the proposed buildings; however, these potentially hazardous substances would not be of a type nor would they occur in sufficient quantities on-site to pose a significant hazard to public health and safety or the environment. The storage and use of these materials would be subject to existing federal and State regulations. Compliance with applicable regulations and conditions of approval would ensure that risks to existing or proposed schools are minimized to the maximum extent practicable. Therefore, the impact would be <i>less than significant</i>. (DEIR, p. 4.7-13.)</p>
<p><b>Impact HAZ-4:</b> Implementation of the proposed project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> No sites that are included in the DTSC EnviroStor database of hazardous materials sites are located in the Southeast Greenway Area. However, three EnviroStor sites, whose status and nature were of potential</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>concern, are located in proximity to the Southeast Greenway Area. As shown in Table 4.7-1, one of these sites was granted regulatory closure in 1993, whereas the remaining two sites (1101 Yulupa Avenue and 1400 Farmers Avenue) have completed all State-required cleanup actions and are only subject to verification monitoring. Given the regulatory status of these sites near the Southeast Greenway Area, and the lack of listed sites within the Southeast Greenway Area boundaries, the potential impact of implementing the proposed project with respect to known listed hazardous materials sites is considered <i>less than significant</i>. (DEIR, p. 4.7-14.)</p>
<p><b>Impact HAZ-5:</b> Implementation of the proposed project would not be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport resulting in a safety hazard for people residing or working in the project area.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> There are no public airports within 2 miles of the southeast greenway area. (DEIR, p. 4.7-14.)</p>
<p><b>Impact HAZ-6:</b> Implementation of the proposed project would not be within the vicinity of a private airstrip and would not result in a safety hazard for people residing or working in the project area.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> There are no private airstrips within 2 miles of the southeast greenway area. (DEIR, p. 4.7-14.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact HAZ-7:</b> Implementation of the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The adoption and implementation of the proposed project would not involve any material changes to public streets, roads, or evacuation infrastructure and it would not include the construction of any features that might impair the implementation of any relevant emergency operation plan. Furthermore, its implementation would not change existing emergency response and rescue access routes within the Southeast Greenway Area. In light of the above, the impact of project implementation with respect to impairing or preventing implementation of an adopted emergency response plan or emergency evacuation plan would be <i>less than significant</i>. (DEIR, p. 4.7-15.)</p>
<p><b>Impact HAZ-8:</b> Implementation of the proposed project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The Southeast Greenway Area is designated as an area referred to as a “Non-Very High Wildfire Hazard Severity Zone” and is not located in an area of high wildfire hazard. In light of CAL FIRE’s determination, the potential impact of project implementation with</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			respect to exposing people or structures to a significant risk of loss, injury, or death involving wildland fires is considered <i>less than significant</i> . (DEIR, p. 4.7-15.)
<p><b>Impact HAZ-9:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to hazards and hazardous materials.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Although the proposed project could introduce a limited number of new structures, and infrastructure to support low-impact recreation activities, implementation would be carried out in accordance with applicable local, State, and federal laws. Furthermore, because the proposed project itself is not proposing site-specific projects, future projects as a result of implementation would be subject to separate project-level CEQA review where site-specific impacts are identified along with mitigation measures. Therefore, adherence to existing policies and ordinances aimed at protecting public safety, along with the provisions of subsequent independent CEQA review for specific projects, the cumulative impacts of implementation of the proposed project would be <i>less than significant</i>. (DEIR, p. 4.7-15.)</p>
<p><b>Section 4.8 - Hydrology and Water Quality</b></p>			
<p><b>Impact Hydro-1:</b> Implementation of the proposed project would not violate any water quality standards</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
or discharge requirements.			<p>§§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> if construction of future potential development projects would disturb more than one acre of soil, compliance with the NPDES General Construction Permit would be required. The GCP requires the submittal of Permit Registration Documents (PRDs) to the SWRCB prior to the start of construction. The PRDs include a Notice of Intent (NOI), risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. Adoption of the proposed project, with the implementation of the above standard permit conditions, would not result in significant construction-related water quality impacts. (DEIR, p. 4.8-17.)</p> <p>Water quality in stormwater runoff is regulated locally by the Santa Rosa Area MRP Permit, which requires compliance with the City of Santa Rosa and County of Sonoma's <i>Low Impact Development (LID) Technical Design Manual</i>, recently revised in 2017. In accordance with General Plan 2035 Policy PSF-I-8, the developer shall prepare and implement a Standard Urban Storm Water Mitigation Plan (SUSMP) in order to reduce pollutants and runoff flows from operation of the proposed project. Required compliance with the MRP and the implementation of LID and BMP site design features would render any potential operational impacts to water quality <i>less than significant</i>. (DEIR, p. 4.8-18.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact HYDRO-2:</b> Implementation of the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> There is sufficient water in future years for the city and if construction dewatering is necessary, it would be a short-term, temporary impact. Therefore, implementation of the proposed project would have a <i>less-than-significant</i> impact with respect to groundwater supplies and groundwater recharge and no mitigation measures are required. (DEIR, p. 4.8-19.)</p>
<p><b>Impact HYDRO-3:</b> Implementation of the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the amount of surface runoff in a manner which would result in substantial erosion or siltation on- or off-site.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> construction would be subject to the requirements of the GCP and would require preparation of a SWPPP to minimize erosion and siltation impacts. Pursuant to the MRP, any future projects would be required to implement construction phase BMPs, post-construction design measures that encourage infiltration in pervious areas, and post-construction source control measures to help keep pollutants out of stormwater. Further, any potential future development under the proposed project would be required to comply with the General</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>Plan 2035 that serve to protect water resources in the city, including streams and drainage areas onsite.</p> <p>In addition, the requirements to implement LID and BMP features, including source control and design measures to control stormwater runoff, would further reduce the potential for erosion or siltation. In addition, any future potential projects would be required to implement stormwater treatment measures to contain site runoff, using specific numeric sizing criteria based on volume and flow rates. Pursuant to the MRP, any future potential projects would be required to implement construction phase BMPs, post-construction design measures that encourage infiltration in pervious areas, and post-construction source control measures to help keep pollutants out of stormwater. (DEIR, p. 4.8-21.)</p>
<p><b>Impact HYDRO-4:</b> Implementation of the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant impact.</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Compliance with the MRP along with the General Plan 2035 policies designed to prevent flooding and maintain the hydrological role of creeks in the City would ensure that the rate and/or volume of surface runoff would not be substantially increased in a manner that results in on-site or off-site flooding and therefore, this impact is <i>less than significant</i>. (DEIR, p. 4.8-22.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact HYDRO-5:</b> Implementation of the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> BMP and LID features will be implemented during any future construction and project operation that will control and reduce the potential for sediment, debris, and other pollutants to be discharged into the storm drain or creeks. With implementation of these measures, the project would not result in substantial additional sources of polluted runoff and impacts would be <i>less than significant</i>. (DEIR, p. 4.8-23.)</p>
<p><b>Impact HYDRO-6:</b> Implementation of the proposed project would not otherwise substantially degrade water quality.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Compliance with the MRP, implementation of BMP and LID features, and adherence to the City’s General Plan policies would ensure that the project does not substantially degrade water quality and the impact would be <i>less than significant</i>. (DEIR, p. 4.8-24.)</p>
<p><b>Impact HYDRO-7:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p>projects, would result in less than significant cumulative impacts with respect to hydrology and water quality.</p>			<p><u>Explanation:</u> Compliance with the City's <i>Storm Water Ordinance</i>, Sonoma County's LID regulations, and the North Coast RWQCB's MRP would require BMPs and LID features to be included in any proposed project. These BMPs include site design, source control, and treatment control measures that provide both flow control and treatment to runoff before it enters the storm drain system or receiving water bodies. In addition, all projects that disturb over 1 acre or more would be required to prepare a SWPPP with erosion and sediment controls that address construction impacts. Projects would also be required to mitigate potential water quality impacts through preparation and implementation of a project-specific SUSMP. The water quality regulations implemented by the North Coast RWQCB take a basin-wide approach and consider water quality impairment in a regional context.</p>
<p><b>Section 4.9 - Land Use and Planning</b></p>			
<p><b>Impact LU-1:</b> Implementation of the proposed project would not physically divide an established community.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Implementation and adoption of the proposed project would result in new development potential up to 47.2</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>acres of park and recreational uses including open space, 244 multi-family housing units, and 12,000 square feet of commercial space, in the Southeast Greenway Area only. The Southeast Greenway Area is composed of undeveloped parcels that are owned by Caltrans and are not publicly accessible and is surrounded by residential, retail, and religious institutional/school facilities land uses. One of the objectives of the proposed project is to provide a continuous pedestrian, bicycle, and non-motorized transportation connections from Spring Lake Regional Park to Farmers Lane and links to downtown Santa Rosa, surrounding neighborhoods and schools, and the regional trail system. Future development under the proposed project would retain the existing roadway patterns and would include circulation improvements such as multi-modal access points, crossings, and connections that are intended to improve multi-modal access within the Southeast Greenway. These improvements do not propose any new major roadways or other physical features that would create new barriers on the project site.</p> <p>The proposed project includes Land Use policies that promote orderly development and land use compatibility with surrounding neighborhoods. Therefore, the proposed project would not divide an existing established community. Impacts related to the division of an existing community would be <i>less than significant</i>. (DEIR&lt; p. 4.9-5.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact LU-2:</b> Implementation of the proposed project would not conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigation an environmental effect.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The proposed project would amend the General Plan 2035 to assign new General Plan land use designations and rezone the land within the Southeast Greenway Area to conform to the new land use designations. The proposed amendment is intended to ensure consistency between the General Plan 2035 and SRCC’s Title 20, Zoning Code. Given that the General Plan is the overriding planning document for the City, and because the proposed project involves amending the General Plan and SRCC to increase consistency; the proposed project would result in a <i>less-than-significant</i> impact with respect to consistency with these planning documents. (DEIR, p. 4.9-6.)</p> <p>Implementation and adoption of the goals and policies articulated in chapter 4.9-8 of the Draft EIR would ensure consistency with the <i>Plan Bay Area</i> by promoting non-vehicular travel in order to decrease GHG emissions. Therefore, implementation of the proposed project would not conflict with the <i>Plan Bay Area</i> and the impact would be <i>less than significant</i>. (DEIR, p. 4.9-8.)</p> <p>The proposed project includes Transportation goals and policies that would provide a variety of multi-</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>modal transportation facilities within the Southeast Greenway Area and connections to existing bicycle facilities in Santa Rosa. Implementation and adoption of these policies would ensure consistency with the Bicycle and Pedestrian Master Plan by providing multi-modal transportation opportunities. Therefore, implementation of the proposed project would not conflict with the BPMP and the impact would be <i>less than significant</i>. (DEIR,p. 4.9-9.)</p> <p>Implementation and adoption of the specific goals and policies identified in the Draft EIR would ensure consistency with the Citywide Creek Master Plan by requiring the restoration of areas surrounding the tree creeks that traverse the project site and maximizing park and recreational opportunities throughout the Southeast Greenway Area. Therefore, implementation of the proposed project would not conflict with the CCMP and the impact would be <i>less than significant</i>. (DEIR, p. 4.9-9.)</p>
<p><b>Impact LU-3:</b> Implementation of the proposed project would not conflict with any applicable habitat conservation plan or natural community conservation plan.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> There are no habitat conservation plans or natural community conservation plans in force which would apply to the proposed project, there would be <i>no impact</i> with respect to conservation plan conflicts. (DEIR, p. 4.9-10.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact LU-4:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to land use and planning.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> above the proposed project would not conflict with any applicable land use plans, policies, or regulations. In addition, the proposed project would not physically divide an existing community, nor would the proposed project conflict with an adopted conservation plan. Therefore, the proposed project would not contribute to a cumulative land use and planning impact and the impact would be <i>less than significant</i>. (DEIR, p. 4.9-10.)</p>
<p><b>Section 4.10 - Noise</b></p>			
<p><b>Impact NOISE-1:</b> Implementation of the proposed project would not cause exposure of people to, or generation of, noise levels in excess of standards established in the General plan or the Municipal Code and/or the applicable standards of other agencies.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> As show in in Table 4.10-9 and Appendix F to the Draft EIR, no road segments would experience substantial noise increases greater than 3 dBA over existing conditions. Therefore, noise impacts from traffic would be <i>less than significant</i>. (DEIR, pp. 4.10-19 to 21.)</p> <p>Noise generated by stationary sources would be subject</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>to the restrictions set by the SRRC, and therefore would not exceed the standards set in the General Plan 2035, and would not result in substantial increases in ambient noise levels, impacts due to stationary noise would be <i>less than significant</i>. (DEIR, p. 4.10-23.)</p> <p>If the Farmers Lane extension project were not built, the traffic volume and thus, the traffic-related noise conditions, would change (increase or decrease) on seven segments. Those roadway segments are shown in italics in Table 4.10-9B. Under both future buildout conditions (with and without the Farmers Lane extension project), no roadway segments would experience substantial noise increases greater than 3 dBA over existing conditions and impacts would be <i>less than significant</i>. (Revised DEIR, p. 4.10-23.)</p>
<p><b>Impact NOISE-2:</b> Implementation of the proposed project would not cause exposure of people to, or generation of, excessive groundborne vibration or groundborne noise levels.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant impact.</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Future development under the proposed project with the potential to result in the use of vibration-causing equipment would be required to comply with the General Plan 2035 policies that are aimed at reducing noise-related impacts. Specifically, SRCC Section 17.16-120, Machinery and Equipment, standards for operating machinery and equipment, which could include construction-related equipment, would not be permitted to exceed ambient base noise level by more</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>than 5 dB at receiving properties. Furthermore, compliance with General Plan 2035 Policy NS-B-4 requires future new projects that could generate noise impacts that would be greater than normally acceptable to submit an acoustical study prepared by a qualified acoustical consultant. Additionally, it is standard practice within the city that construction permits also require contractors to use best management practices to reduce noise impacts. (DEIR, p. 4.20-24.)</p> <p>Typically, only industrial uses that use heavy machinery or rail projects where passing trains could generate perceptible levels of vibration would result in vibration concerns. Potential future development under the proposed project could result in mixed-use, residential uses and park and recreational uses, which do not contain sources that would generate substantial levels of vibration. Therefore, operational vibration impacts due to potential future development under the proposed project would be <i>less than significant</i>. (DEIR, p. 4.10-24.)</p> <p>Typically, only industrial uses that use heavy machinery or rail projects where passing trains could generate perceptible levels of vibration would result in vibration concerns. Potential future development under the proposed project could result in mixed-use, residential uses and park and recreational uses, which do not contain sources that would generate substantial levels of vibration. Therefore, operational vibration impacts due to potential future development under the</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			proposed project would be <i>less than significant</i> . (Revised DEIR, p. 4.10-29.)
<p><b>Impact NOISE-3:</b> Implementation of the proposed project would not cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the proposed project.</p>	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Project-generated operational noise from traffic, stationary noise sources (i.e., mechanical systems), and operational activities will not result in a substantial permanent increase in ambient noise levels. Therefore, these on-going activities would generate <i>less-than-significant</i> noise impacts and no mitigation measures are needed. (DEIR, p. 4.10-25 and Revised DEIR, p. 4.10-29.)</p>
<p><b>Impact NOISE-4:</b> Implementation of the proposed project would cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.</p>	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Construction of future individual development projects that could occur under the proposed project would temporarily increase the ambient noise environment in the vicinity of each future development project, potentially affecting existing and future sensitive uses in the vicinity. Future development under the proposed project would be required to provide project-specific data to the City, and would be required to comply with</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>the City’s regulations to reduce any potential construction-related noise impacts to a less-than-significant level. Specifically, compliance with SRCC Section 17.16-120, Machinery and Equipment, standards for operating machinery and equipment, which could include construction-related equipment, would not be permitted to exceed ambient base noise level by more than 5 dB at receiving properties. Furthermore, General Plan 2035 Policy NS-B-4 requires new projects that could generate noise impacts that would be greater than normally acceptable to submit an acoustical study prepared by a qualified acoustical consultant. Additionally, implementation of the best management practices listed under impact discussion NOISE-2 would insure construction-related noise impacts are reduced. The implementation of these policies, future acoustical studies, and standard permitting practices would ensure that construction-related noise impacts be <i>less than significant</i>. (DEIR, p. 4.10-27 and Revised DEIR pp. 4.10-30 and 31.)</p>
<p><b>Impact NOISE-5:</b> Implementation of the proposed project would not cause exposure of people residing or working in the vicinity of the study area to excessive aircraft noise levels, for a project locate within an airport land use plan, or where such a plan has not been adopted, within 2 miles of a public airport or public</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The nearest public airport is the Sonoma County Airport, located approximately 9 miles northwest of the project area. Future development in the Southeast Greenway Area would not expose people onsite to</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
use airport.			excessive airport-related noise levels. Therefore, <i>no impact</i> would occur. (DEIR, p. 4.10-28 and Revised DEIR, p. 4.10-31.)
<p><b>Impact NOISE-6:</b> Implementation of the proposed project would not cause exposure of people residing or working in the project site to excessive noise levels, for a project within the vicinity of a private airstrip.</p>	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The nearest heliport is at the Santa Rosa Memorial Hospital, located approximately one mile northwest of the project site. While operations may, at times, be audible at the site, the relatively limited and sporadic use of this heliport would result in a negligible contribution to overall noise levels in the project area. The nearest private airport is Graywood Ranch Airport, located approximately 6 miles to the southeast of the project area. Future development under the proposed project would not expose people onsite to excessive noise levels from aircraft approaching or departing these aircraft facilities and <i>no impact</i> would occur. (DEIR, p. 4.10-28 and Revised DEIR, p. 4.10-31.)</p>
<p><b>Impact NOISE-7:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would not result in a significant cumulative impact with</p>	No mitigation is necessary.	Less than significant	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
respect to noise.			<p><u>Explanation:</u> The proposed project's contribution to increases in ambient noise levels and vibration would be less than significant, even when accounting for traffic increases forecast in the Southeast Greenway Area. Potential new stationary sources resulting from future development under the proposed project would not be expected to substantially increase ambient noise levels in the area. Additionally, HVAC, amplified sound, and other stationary noise sources would be required to comply with the restrictions set in the SRCC. Of particular note with all existing and future stationary sources associated with the project is that they are generally localized in nature (as opposed to more area-wide sources such as roadways and freeways). Given this relatively limited sphere of influence for any individual stationary source, the aggregation of stationary sources due to the proposed project and other future projects within the city would not be expected to be cumulatively considerable. Thus, cumulative impacts from project-related stationary noise sources would be <i>less than significant</i>. (DEIR, p. 4.10-29 to 29.)</p> <p>Construction activities may occur simultaneously and in close proximity to noise-sensitive receptors, resulting in potentially significant impacts. However, it cannot be determined whether other, close-proximity projects will be conducted simultaneously or what the extent of their potential noise emissions might be, since details of future individual development projects</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>in the vicinity of the Southeast Greenway Area are currently unknown. With implementation of the pertinent General Plan 2035 policies, future acoustical studies, and standard permitting practices, the potential for excessive noise and/or vibration from construction activities would be reduced to a <i>less-than-significant</i> level. (DEIR, p. 4.10-29 and Revised DEIR, p. 4.10-32.)</p>
<b>Section 4.11 – Population and Housing</b>			
<p><b>Impact POP-1:</b> Implementation of the proposed project would not induce substantial population growth in an area, either directly or indirectly.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Per the General Plan 2035, the city is expected to grow to 237,000 residents, with 96,295 housing units, and 125,180 employees by the horizon year 2035. The future 244 multifamily residential units and associated 632 new residents and the 12,000 square feet of commercial development and associated 40 new employees of the proposed project represent less than one percent of the projected growth in the city. Accordingly, this does not represent substantial population growth in the city or region. While implementation of the proposed project could result in new housing and population, it would not substantially induce new population growth either directly or indirectly. In addition, the proposed project would be required to comply with the General Plan Housing</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			Policies (listed above) which seek to provide adequate housing opportunities for all residents and meet the City's housing needs through increased densities. Accordingly, impacts related to substantial population growth would be <i>less than significant</i> . (DEIR, pp. 4.11-2 to 3.)
<b>Impact POP-2:</b> Implementation of the proposed project would not displace a substantial number of existing housing units, necessitating the construction of replacement housing elsewhere.	No mitigation is necessary.	Less than significant	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)  <u>Explanation:</u> the project site is comprised of vacant parcels and does not contain any residential units. As such, implementation of the proposed project would not displace existing housing or people and <i>no impact</i> would occur. (DEIR, p. 4.11-4.)
<b>Impact POP-3:</b> Implementation of the proposed project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	No mitigation is necessary	Less than significant	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)  <u>Explanation:</u> the project site is comprised of vacant parcels and no residents currently occupy the site. As such, implementation of the proposed project would not result in the displacement of people and <i>no impact</i> would occur. (DEIR, p. 4.11-4.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact POP-4:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would not result in significant cumulative impacts with respect for population and housing.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> the proposed project would not induce a substantial amount of growth or require the construction of replacement housing elsewhere. Although the proposed project would increase the residential development potential by 244 multi-family units compared to the development scenario assumed under the General Plan 2035, the proposed would amend the General Plan 2035 in order to account for this growth. Thus, the proposed project would not contribute to cumulative growth that would not displace substantial numbers of people or housing or exceed planned levels of growth. Therefore, cumulative impacts would be <i>less than significant</i>. (DEIR, p. 4.11-4.)</p>
<p><b>Section 4.12 - Public Services and Recreation</b></p>			
<p><b>Impact PS-1:</b> Implementation of the proposed project would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.</p>	<p>No mitigation is necessary</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> According to the SRFD, potential future construction and operation as a result of the proposed project would not prevent the SRFD from maintaining acceptable service ratio, response times, or other performance</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>objectives that would require the new construction of or modifications to an existing fire station. There are plans for expansion and construction of new facilities in the city, however, not as a result of the proposed project. Future development under the proposed project would be required to comply with the City's Fire Code (SRCC Chapter 18-44) and Building Code (SRCC Chapter 18-16), including installation of sprinklers, proper protection systems such as fire extinguishing systems and alarms, fire hydrants, water fire flow requirements, and access points to accommodate fire equipment. Compliance with the SRCC would also be required to ensure the SRFD standards to provide the minimum access and water supplies would be met for any future development on the project site.</p> <p>with compliance with regulations related to fire protection, impacts to fire protection services as a result of implementing the proposed project would be <i>less than significant</i> and no mitigation measures are required. (DEIR, pp. 4.12-4 to 5.)</p>
<p><b>Impact PS-2:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to fire protection services.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The proposed project, in combination with other reasonably foreseeable development, would increase the population of Santa Rosa, and subsequently the</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>SRFD service area, and could contribute to the need for expanded fire protection and emergency medical services that could cause significant physical impacts to the environment. As described in impact discussion PS-1, the proposed project's contribution to this cumulative impact would be less than cumulatively considerable. Like future development under the proposed project, all future development in the city would be required to comply with regulations established to reduce adverse impacts from fire hazards. For these reasons, the cumulative impact on the provision of fire services would be <i>less than significant</i>. (DEIR, pp. 4.12-4 to 5.)</p>
<p><b>Impact PS-3:</b> Implementation of the proposed project would not result in the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Potential future development could result in approximately 632 new residents and 40 employees that would increase police protection demands on the SRPD. As such, this represents an increase in population of 0.27 percent, which would not likely warrant the construction of a new police station or require modifications to an existing station that could result in future environmental impacts. The SRPD has confirmed that future development under the proposed project would not result in the need for expansion or addition of facilities. Ongoing compliance with the existing General Plan 2035 policies identified in the</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>local regulations sections above would ensure adequate police protection services are available for the existing and future residents of Santa Rosa. With compliance with regulations related to police protection, impacts to police services as a result of implementing the proposed project would be <i>less than significant</i> and no mitigation measures are required. (DEIR, p. 4.12-8.)</p>
<p><b>Impact PS-4:</b> The proposed project, in combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to police services.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The proposed project, in combination with other reasonably foreseeable development, would increase the population of Santa Rosa, and subsequently the SRPD service area, and could contribute to the need for expanded police services that could cause significant physical impacts to the environment. The proposed project’s contribution to this cumulative impact would be less than cumulatively considerable. Furthermore, the General Plan 2035 EIR evaluated potential impacts to public safety services resulting from buildout of Santa Rosa and the City’s Urban Growth Boundary. The General Plan 2035 EIR determined that with implementation of the goals and policies in the General Plan 2035, potential cumulative impacts to police services would be less than significant. For these reasons, the cumulative impact on the provision of police services would be <i>less than significant</i>. (DEIR, p. 4.12-8.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact PS-5:</b> Implementation of the proposed project would not result in the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Under Section 65996 of the California Government Code, the payment of the developer fees for residential and commercial development required for any future residential development in the SRCSD and the RVUSD would fully mitigate the impacts of new development on school facilities. Therefore, overall, impacts related to schools would be <i>less than significant</i>. (DEIR, p. 4.12-15.)</p>
<p><b>Impact PS-6:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to school services.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Cumulative projects would add new students to the SRCSD and RVUSD, in addition to those generated by potential future development under the proposed project, which could result in the need for new or expanded school facilities. However, like the proposed project, these cumulative projects would also be subject to the school mitigation fees regulated by State law. Under Section 65996 of the California Government Code, the payment of impact fees is deemed to fully mitigate the impacts of new development on school facilities. Therefore,</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			cumulative impacts related to school facilities would be <i>less than significant</i> . (DEIR, p. 4.12-15.)
<p><b>Impact PS-7:</b> The proposed project would not result in the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.</p>	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Potential future development under the proposed project could generate approximately 244 new housing units, including 632 new residents and 40 employees. The permanent new residents could increase the demand for the library services at the Sonoma County Library. General Plan 2035 Goal PSF-D requires the City to retain and enhance the high quality library service at the Sonoma County Library, and explore ways to improve service such as developing existing facilities. Sonoma County Library staff indicated that increased demand from the proposed project would not require physical expansion of new library facilities. Therefore, a <i>less-than-significant</i> impact would occur with respect to the need for new or physically altered library facilities. (DEIR, p. 4.12-18.)</p>
<p><b>Impact PS-8:</b> The proposed project, in combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to the construction of</p>	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
other public facilities.			<p><u>Explanation:</u> the proposed project would not require the need for new or altered library facilities. Accordingly, the proposed project's contribution would not be cumulatively considerable and cumulative impacts to library services would be <i>less than significant</i>. Furthermore, if and when new or expanded facilities do become necessary due to cumulative development projects in the service area, construction or expansion projects would be subject to separate CEQA review in order to identify and mitigate potential environmental impacts. Therefore, a <i>less-than-significant</i> cumulative impact associated with libraries would occur. (DEIR, p. 4.2-19.)</p>
<p><b>Impact PS-9:</b> Implementation of the proposed project would not result in the need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.</p>	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Because the proposed project includes publicly accessible park and recreational uses including open spaces up to 47.2 acres, this would contribute to the City's goals for providing recreational opportunities to the residents of Santa Rosa and impacts be <i>less than significant</i> impacts. (DEIR, p. 4.12-26.)</p>
<p><b>Impact PS-10:</b> Implementation of the proposed project would not increase the use of existing neighborhood and regional parks</p>	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p>or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated.</p>			<p><u>Explanation:</u> The proposed project would introduce recreational facilities in Santa Rosa and the region. In addition, Sonoma County Regional Parks has identified five new improvements and extensions to existing parks in the southeast park planning quadrant, which is located southeast of the intersection of Highway 101 and SR 12, adding to the existing regional park facilities. Consequently, the proposed project would not result in substantial physical deterioration of existing neighborhood and regional parks or other recreational facilities, and a <i>less-than-significant</i> impact would occur. (DEIR, p. 4.12-27.)</p>
<p><b>Impact PS-11:</b> The proposed project would include recreational facilities and would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Implementation of the proposed project would include park and recreational facilities up to 47.2 acres that would contribute to an increase in access to recreation facilities for residents of Santa Rosa and the region. For this reason, implementation of the propose project would not warrant the construction of recreational facilities elsewhere that could result in physical impacts to the environment. Therefore, implementation of the proposed project would not require the expansion of an existing facility, nor would it require the addition of new parks in Santa Rosa or the</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			surrounding area and impacts would be <i>less than significant</i> . (DEIR, p. 4.12-27.)
<p><b>Impact PS-12:</b> The proposed project, in combination with past, present and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to parks.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> While cumulative growth in the resident and employee population would result in increased use of neighborhood and regional parks and recreational facilities, buildout of the reasonably foreseeable projects in Santa Rosa would not result in substantial adverse impacts to parks and recreational facilities in Santa Rosa. The new residents and employees that would be generated by cumulative development would use existing local and regional parks and recreational facilities, and continued implementation of the parkland dedication requirements established in the SRCC would ensure that existing parks or public facilities are well-maintained and improved as needed, avoiding substantial physical deterioration of recreational facilities.</p> <p>Overall, implementation of the proposed project, in combination with other past, present, and reasonably foreseeable projects, would result in a <i>less-than-significant</i> cumulative parks and recreation impact. (DEIR, p. 4.12-28.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<b>Section 4.13 - Transportation</b>			
<p><b>Impact TRANS-1a:</b> The Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8) currently operates unacceptably at LOS E during the PM peak hour and is projected to continue operating at LOS E upon the addition of project-generated traffic, with increases in delay of approximately 9.6 seconds. This is considered to be a <i>significant</i> impact.</p>	<p><b>Mitigation Measure TRANS-1a:</b> In order to improve operations to an LOS D in the near-term, an additional eastbound through-lane from the SR 12 eastbound off-ramp onto Hoen Avenue Frontage Road could be added and Hoen Avenue Frontage Road could be widened downstream of the intersection to include two eastbound lanes.</p>	<p>Significant unavoidable impact.</p>	<p><u>Finding:</u> Those changes or alterations required to mitigate or avoid the project’s significant effects to level of service, are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.</p> <p>No feasible mitigation is available, or implementation of feasible mitigation cannot be guaranteed, because it is not subject to the control of the City for the intersections of the SR 12 eastbound off-ramp. Therefore, the project’s impacts to these intersections are considered <i>significant and unavoidable</i>.</p> <p>Further, the City Council finds that the environmental effect cannot be mitigated, that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p><u>Explanation:</u> Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8) is projected to continue operating unacceptably at LOS E during the PM peak hour, with an anticipated 9.6-second increase in average delay attributable to the project. This is considered a <i>significant</i> impact.</p> <p>The City is currently planning the Farmers Lane extension between Bennett Valley Road and Petaluma</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>Hill Road that would change traffic patterns at the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), resulting in more efficient operations. However, with planned future infrastructure improvements elsewhere, the intersection is projected to operate acceptably at LOS D with no added improvements. This is due to the change in traffic volumes and patterns associated with the City's planned extension of Farmers Lane between Bennett Valley Road and Petaluma Hill Road in the future, which would cause shifts in regional traffic patterns to occur. At the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8), this shift in regional traffic volumes is projected to result in more through traffic on Farmers Lane and less traffic exiting the SR 12 freeway ramp, which translates to more efficient intersection operation. Therefore, while the Farmers Lane extension is expected to be complete under Future Conditions, it would not be complete in the near-term or under Existing plus Project conditions. In order to improve operation to an LOS D in the near-term, an additional eastbound through-lane onto Hoen Avenue Frontage Road could be added and Hoen Avenue Frontage Road could be widened downstream of the intersection to include two eastbound lanes. However, this would be a temporary improvement as the City is currently pursuing long-range plans to improve the intersection level of service through the Farmers Road extension project. Therefore, because the City already has long-range plans to improve the</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>existing deficiencies at this intersection and the near-term improvements are considered to be infeasible. As a result, the project's impact under Existing plus Project conditions would be considered <i>significant and unavoidable</i> until such time that the Farmers Lane extension is completed in the future. (DEIR, pp. 4.3-26 to 27.)</p> <p>While the listed improvements would reduce the impact to a less-than-significant level, the improvements would be temporary. As discussed, the City already has long-range plans to improve the existing deficiencies at this intersection that have identified funding sources and are also reflected in the Sonoma County Travel Model. The listed temporary improvements would result additional costs. The costs to implement both the near-term and long-term improvements could be considered an inefficient and redundant use funds. Additionally, the intersection and its western leg (the SR 12 eastbound off ramp) are also under Caltrans' jurisdiction and there is uncertainty as to whether the City would gain approvals to complete the improvements. Ultimately, because it is uncertain whether it will be possible to implement these roadway improvements due to funding and/or physical constraints, the project impacts under Existing plus Project conditions would be considered <i>significant and unavoidable</i>. (Revised DEIR, p. 4.13-25.)</p>
<b>Impact TRANS-1b:</b> On Farmers Lane under Future plus Project	<b>Mitigation Measure TRANS-1b.1:</b> The Farmers Lane/Fourth Street-Sonoma	Significant and Unavoidable	<b>Finding:</b> Those changes or alterations required to mitigate or

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p>conditions, the project is anticipated to cause a 1-mile per hour reduction in average southbound speeds during the PM peak hour, and is anticipated to cause operation to drop from LOS D to LOS E in the southbound direction during the AM peak hour.</p>	<p>Highway intersection (#1) could be widened in the future to include dual northbound right-turn lanes and triple westbound left-turn lanes, including widening of Farmers Lane to provide three southbound lanes for a distance of approximately 350 feet south of the intersection, or otherwise modified as determined appropriate by the City Traffic Engineer to provide equivalent or superior operation. This is a major roadway and bridge widening project that would affect traffic flow and operations on circulation facilities that are owned and maintained by Caltrans, as well as additional environmental review including assessment of potential impacts to Santa Rosa Creek, and would require substantial review and approval of any modifications by Caltrans.</p> <p><b>Mitigation Measure TRANS-1b.2:</b> The City shall consult with Caltrans to modify the signal phasing at the Farmers Lane/Hoen Avenue intersection (#5) in the future to include protected-permitted left-turn phasing on Hoen Avenue, or otherwise modified as determined appropriate by the City Traffic Engineer to provide equivalent or superior operation.</p>		<p>avoid the project’s significant effects to level of service, are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.</p> <p>No feasible mitigation is available, or implementation of feasible mitigation cannot be guaranteed, because it is not subject to the control of the City for the Farmers Lane/Fourth Street-Sonoma Highway intersection (#1). Therefore, the project’s impacts to these intersections are considered <i>significant and unavoidable</i>.</p> <p>Further, the City Council finds that the environmental effect cannot be mitigated, that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p><u>Explanation</u> With implementation of the identified measures, the modifications at the Farmers Lane/Fourth Street-Sonoma Highway intersection (#1) and Farmers Lane/Hoen Avenue intersection (#5), the corridor would be expected to operate acceptably at LOS D or better in both directions, both without and with the project. However, there is no known funding for the measures and environmental review has also not yet commenced. For these reasons there is no certainty that the improvements can ultimately be implemented. As a result, the impact would remain <i>significant and unavoidable</i>. (DEIR, p. 4.13-29.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>While improvements at the Farmers Lane/Hoen Avenue intersection (#5) as described in Mitigation Measure TRANS-1b.2 would require consultation with and approval from Caltrans, they are routine in nature and typical of changes made to signal timing in response to changes in traffic flow over time, so are considered to be achievable. In contrast, the potential improvements at the Farmers Lane/Fourth Street-Sonoma Highway intersection (#1) as described in Mitigation Measure TRANS-1b.1 may be infeasible given uncertainties in being able to gain approval from Caltrans and the need for further environmental review. It should be noted that the improvements are, however, consistent with those that have been identified as long-range improvements for the intersection by the City's Department of Transportation and Public Works. The widening of the Farmers Lane/Fourth Street-Sonoma Highway intersection is a major project that would require a combination of local and regional funding to complete. The improvement is currently identified in the SCTA's Comprehensive Transportation Plan: <i>Moving Forward 2040</i>, with an estimated cost of \$7.3 million. As shown in Table 4.13-17, with implementation of these measures, the modifications at the Farmers Lane/Fourth Street-Sonoma Highway intersection (#1) and Farmers Lane/Hoen Avenue intersection (#5), the corridor would be expected to operate acceptably at LOS D or better in both directions, both without and with the project. (Revised DEIR, p. 4.13-29.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact TRANS-1c:</b> The Farmers Lane/Fourth Street-Sonoma Highway intersection (#1) is projected to operate unacceptably at LOS E during the AM and PM peak hours without the project and with the addition of project traffic would drop to LOS F during the AM peak hour.</p>	<p><b>Mitigation Measure TRANS-1c:</b> See Mitigation Measure TRANS-1b.1. As described under Impact TRANS-1b, the City shall widen Farmers Lane/Fourth Street-Sonoma Highway intersection (#1) in the future to include dual northbound right-turn lanes and triple left-turn lanes, including widening of Farmers Lane to provide three southbound lanes for a distance of approximately 350 feet south of the intersection, or otherwise modified as determined appropriate by the City Traffic Engineer to provide equivalent or superior operation.</p>	<p>Significant and Unavoidable</p>	<p><u>Finding:</u> Those changes or alterations required to mitigate or avoid the project’s significant effects to level of service, are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.</p> <p>No feasible mitigation is available or implementation of feasible mitigation can not be guaranteed because it is not subject to the control of the City for the Farmers Lane/Fourth Street-Sonoma Highway intersection (#1). Therefore, the project’s impacts to these intersections are considered <i>significant and unavoidable</i>.</p> <p>Further, the City Council finds that the environmental effect cannot be mitigated, that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p><u>Explanation:</u> Although this impact could be reduced, as described under Impact TRANS-1b, the widening project described has no identified funding source and its potential environmental impacts have yet to be analyzed. Because uncertainty exists as to whether the improvement can ultimately be implemented, the impact is considered to be <i>significant and unavoidable</i>. (DEIR, p. 4.13-32 and Revised DEIR, p. 4.13-33.)</p>
<p><b>Impact TRANS-1d:</b> The southbound stop-controlled</p>	<p><b>Mitigation Measure TRANS-1d:</b> The City shall ensure that a traffic signal is</p>	<p>Less than significant</p>	<p><u>Finding:</u> Implementation of Mitigation Measure TRANS-1d,</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p>approach the Hoen Avenue/Franquette Avenue intersection (#13) is projected to operate at LOS F during the AM peak hour, with a 6.1-second increase in delay attributable to the project, which would meet the CA-MUTCD “Peak Hour Volume” warrant for signalization.</p>	<p>installed at the intersection of Hoen Avenue/Franquette Avenue in the future. The City’s Department of Transportation and Public Works should monitor operations at the intersection through field observation and review of development traffic impact studies to assure signalization of the intersection either through future development requirements or as part of the City’s Capital Improvement Program once the City Traffic Engineer determines that signalization is warranted.</p>		<p>which has been required or incorporated into the project, will reduce this impact to a less-than-significant level. The City Council hereby directs that this mitigation measure be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p><u>Explanation:</u> Installation of a traffic signal would entail use of standard signal equipment within the existing right-of-way, with no apparent constraints that would affect the feasibility of completing the improvement. Implementation of mitigation measure TRANS-1d would reduce this impact to less than significant. (DEIR, p. 4.13-34 and Revised DEIR, p. 4.13-33.)</p>
<p><b>Impact TRANS-1e:</b> Under the Future plus Project (Without Farmers Lane Extension) scenario, the Farmers Lane/SR 12 Eastbound Off-ramp-Hoen Avenue Frontage Road intersection (#8) is projected to operate unacceptably at LOS E during the PM peak hour, with the project increasing the intersection’s average vehicle delay by 8.0 seconds.</p>	<p><b>Mitigation Measure TRANS-1e:</b> In order to improve operations to an LOS D, an additional eastbound through-lane from the SR 12 eastbound off-ramp onto Hoen Avenue Frontage Road could be added and Hoen Avenue Frontage Road could be widened downstream of the intersection to include two eastbound lanes. <i>(Note this is the same recommended improvements under Mitigation Measure TRANS-1a.)</i></p>	<p>Significant and Unavoidable</p>	<p><u>Finding:</u> Those changes or alterations required to mitigate or avoid the project’s significant effects to level of service, are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.</p> <p>No feasible mitigation is available, or implementation of feasible mitigation cannot be guaranteed, because it is not subject to the control of the City for the intersections of the SR 12 eastbound off-ramp. Therefore, the project’s impacts to these intersections are considered <i>significant and unavoidable</i>.</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>Further, the City Council finds that the environmental effect cannot be mitigated, that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p><u>Explanation:</u>            Similar to impact discussion TRANS-1a, these listed improvements would be temporary. As discussed, the City already has long-range plans to improve the existing deficiencies at this intersection that have identified funding sources and are also reflected in the Sonoma County Travel Model. While the Farmers Lane extension is not assumed to be complete in this scenario before the buildout of the project and the General Plan, it is still a planned future improvement with the potential to reduce the impact once constructed. The listed temporary improvements would result in additional costs. The costs to implement both improvements could be considered an inefficient and redundant use funds. Additionally, the intersection and its western leg (the SR 12 eastbound off ramp) are also under Caltrans' jurisdiction and there is uncertainty as to whether the City would gain approvals to complete the improvements. Ultimately, because it is uncertain whether it will be possible to implement these roadway improvements due to funding and/or physical constraints, the project impacts under Future plus Project (Without Farmers Lane Extension) conditions would be considered <i>significant and unavoidable</i>. (Revised DEIR, p. 4.13-37.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact TRANS-2:</b> Implementation of the proposed project would not conflict with an applicable congestion management program, including, but not limited to, level of service standards established by the county congestion management agency for designated roads or highways.</p>	<p>No mitigation is necessary.</p>	<p>No impact</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> There is currently no adopted regional congestion management program in Sonoma County, and therefore implementation of the proposed project would have <i>no impact</i>. (DEIR, p. 4.13-35 and Revised DEIR, p. 4.13-39.)</p>
<p><b>Impact TRANS-3:</b> The proposed project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.</p>	<p>No mitigation is necessary.</p>	<p>No impact</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The Southeast Greenway Area is not located near any airports, approach, or departure zones. Therefore, adoption and implementation of the proposed project would have <i>no impact</i> to air traffic. (DEIR, p. 4.13-35 and Revised DEIR, p. 4.13-39.)</p>
<p><b>Impact TRANS-4:</b> Implementation of the proposed project would not substantially increase hazards due to a design feature or incompatible uses.</p>	<p>No mitigation is necessary</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u></p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>Adoption and implementation of the proposed project would add a new unsignalized intersection on Hoen Avenue Frontage Road to the west of Townview Lane (i.e., Hoen Avenue Frontage Road /New Mixed Use Street intersection (#11)), providing access to an area designated by the proposed project for potential future mixed-use development. The proposed new Hoen Avenue Frontage Road /New Mixed Use Street intersection (#11) is projected to operate at an acceptable level of service under near-term and long-range conditions, would be located in an area with sufficient sight distance, and is not projected to cause operational impacts to the adjacent Townview Lane intersection. The proposed new intersection design would be subject to the requirements contained in the City's <i>Design and Construction Standards</i>. Any potential circulation impacts associated with this proposed new intersection are therefore considered to be <i>less than significant</i>. (DEIR, p. 4.13-36 and Revised DEIR, p. 4.13-40.)</p>
<p><b>Impact TRANS-5:</b> Implementation of the proposed project would not result in inadequate emergency access.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Vehicular access to development and activity areas along the Southeast Greenway Area would generally take place on existing City streets. Development of future access road would have to undergo environmental and would be subject to the</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>requirements contained in the City's <i>Design and Construction Standards</i> which include requirements for emergency access. In addition, per SRCC Chapter 18-44, Fire Code, requires that roads be maintained to provide adequate space for emergency vehicle access. As a result, implementation of the proposed project would be result in a <i>less than</i> significant impact with respect to emergency access. (DEIR, p. 4.13-36 and Revised DEIR, p. 4.13-40.)</p>
<p><b>Impact TRANS-6:</b> Implementation of the proposed project would not conflict with adopted policies, plans or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The proposed project supports and expands upon current policies regarding non-motorized transportation. It is consistent with SCTA's <i>Moving Forward 2040</i> and supports and/or strengthens the non-motorized transportation policies set forth in the General Plan 2035. In addition, the proposed multi-use pathway is also consistent with the BPMP, which depicts an off-street (Class I) pathway between Hoen Avenue and Spring Lake Regional Park. Accordingly, implementation of the proposed project would result in a <i>less-than-significant</i> impact with respect to consistency with adopted policies, plans, or programs. (DEIR, p. 4.13-37 and Revised DEIR, p. 4.13-41.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact TRANS-6a:</b> The proposed multi-use pathway crossings could result in pedestrian and bicyclist safety concerns</p>	<p><b>Mitigation Measure TRANS-6a.1:</b> The mid-block multi-use pathway crossings on Summerfield Road and Yulupa Avenue should include, at a minimum, an active pedestrian warning system (such as, but not limited to, pedestrian-activated flashing beacons or rapid rectangular flashing beacons) as well as high-visibility crosswalk markings.</p> <p><b>Mitigation Measure TRANS-6a.2:</b> The mid-block multi-use pathway crossing on Franquette Avenue should include, at a minimum, high-visibility crosswalk markings and signs.</p> <p><b>Mitigation Measure TRANS-6a.3:</b> The multi-use pathway crossing at the Hoen Avenue/Hoen Avenue Frontage Road-Cypress Way signalized intersection should include, at a minimum, new high-visibility crosswalk markings and signal phasing to serve pedestrians and bicyclists, as well as signage (such as “Yield to Bikes” signs) alerting drivers to the presence of bike crossings.</p> <p><b>Mitigation Measure TRANS-6a.4:</b> The ultimate configuration of multi-use pathway street crossing designs,</p>	<p>Less than significant</p>	<p><u>Finding:</u> Implementation of Mitigation Measures TRANS-6a.1, TRANS-6a.2, TRANS-6a.3, and TRANS-6a.4, which have been required or incorporated into the project, will reduce this impact to a less-than-significant level. The City Council hereby directs that these mitigation measures be adopted. The City Council, therefore, finds that changes or alterations have been required in, or incorporated into, the project that avoid the significant environmental effect, as identified in the Final EIR.</p> <p><u>Explanation:</u> The proposed project includes four locations where the proposed multi-use pathway would cross public streets, each of which are evaluated below. Note that the precise locations and designs of the crossings would be determined in the future, and that the evaluation focuses on the general appropriateness of the crossing locations and types of crossing amenities that may be appropriate to enhance pedestrian access. The ultimate designs of the crossings and their associated devices (if any) shall be analyzed and approved by the City’s Traffic Engineer in consideration of the physical characteristics that are present at the time. Implementation of the identified mitigation measures will reduce this impact to less than significant. (DEIR, p. 4.13-38 and Revised DEIR, pp. 4.13-42 through 44.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	including selection of warning devices if appropriate, shall be determined by the City's Traffic Engineer, in consideration of the physical characteristics of each site and best design practices that exist at the time the design is initiated.		
<p><b>Impact TRANS-6b:</b> Adequate pedestrian and bicycle circulation facilities to cross the SR 12 Westbound On-ramp cannot be assured, as both of the options in the proposed project for creating this linkage entail modifications to Caltrans facilities that are outside of the City's control.</p>	<p><b>Mitigation Measure TRANS-6b:</b> The City shall ensure that whatever entity ultimately constructs the pedestrian and bicycle circulation facilities to cross the SR 12 Westbound On-ramp obtains an encroachment permit and design approval from Caltrans prior to implementing either of the new pedestrian-bicycle crossing options, and shall oversee the preparation of preliminary designs and studies needed for Caltrans review.</p>	<p>Significant and Unavoidable</p>	<p><u>Finding:</u> Implementation of Mitigation Measure TRANS-6b, which has been required or incorporated into the project, will reduce this impact, but not to a less-than-significant level. The City Council hereby directs that this mitigation measure be adopted. The City Council finds that the environmental effect has been mitigated to the maximum extent feasible, that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p><u>Explanation:</u> Both of the Plan's options to establish a pedestrian-bicycle crossing of the Hoen Avenue Frontage Road/SR 12 Westbound On-ramp involve modifications to facilities owned by Caltrans, and the City would need to obtain Caltrans approval prior to implementing either option. Because both options are complex, would require preliminary design to discern potential effects, and would require substantial Caltrans review, uncertainty exists as to whether either improvement can ultimately be implemented. As a result the impact is considered to be <i>significant and</i></p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p><i>unavoidable</i>. With respect to the second option, construction of an at-grade crossing at the Hoen Avenue Frontage Road/SR 12 Westbound On-ramp intersection cannot be implemented without including provisions to help maintain the safety of crossing pedestrians. This is considered to be a significant impact. (Revised DEIR, p. 13-44)</p>
<p><b>Impact TRANS-6c:</b> Potential development of an at-grade crossing at the Hoen Avenue Frontage Road/SR 12 Westbound On-ramp intersection could result in pedestrian safety concerns.</p>	<p><b>Mitigation Measure TRANS-6c.1:</b> If an at-grade pedestrian crossing is to be implemented at Hoen Avenue Frontage Road/SR 12 Westbound On-ramp intersection, the intersection would need to be modified to include, at a minimum, the following components:</p> <ul style="list-style-type: none"> <li>▪ Signal or pedestrian hybrid beacon with an exclusive phase for pedestrian-bicycle movements</li> <li>▪ Horizontal realignment that regulates vehicle speeds to no greater than 35 mph at the crossing</li> <li>▪ Maintained clear line of sight between drivers and pedestrians/bicyclists on the crossing</li> <li>▪ Right-turn pocket on westbound Hoen Avenue Frontage Road to provide vehicle queue storage</li> </ul> <p><b>Mitigation Measure TRANS-6c.2:</b> The ultimate configuration of any at-grade pedestrian crossing at the Hoen Avenue</p>	<p>Significant and Unavoidable</p>	<p><u>Finding:</u> Implementation of Mitigation Measure TRANS-6c.1 and 2, which have been required or incorporated into the project, will reduce this impact, but not to a less-than-significant level. The City Council hereby directs that these mitigation measures be adopted. The City Council finds that the environmental effect has been mitigated to the maximum extent feasible, that no feasible mitigation or alternative exists that would avoid the significant effect and therefore, the impact is significant and unavoidable.</p> <p><u>Explanation:</u> Because there is uncertainty as to whether the City will be able to gain Caltrans approval to implement the pedestrian-bicycle crossing improvements, the impact would remain <i>significant and unavoidable</i>. (Revised DEIR, p. 13-44.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
	<p>Frontage Road/SR 12 Westbound On-ramp intersection shall be evaluated and determined by the City's Traffic Engineer, in collaboration with Caltrans, and in consideration of the physical characteristics the site and best design practices that exist at the time the design is initiated. The City shall ensure an encroachment permit and design approval from Caltrans is obtained prior to implementing the new pedestrian crossing.</p>		
<b>Section 4.14 – Utilities and Service Systems</b>			
<p><b>Impact UTIL-1:</b> Implementation of the proposed project would have sufficient water supplies available to serve the proposed project from existing entitlements and resources, and would not require new or expanded entitlements.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The projected water demand for the proposed project would be 36 AFY. Given that the City would have 3,297 AFY of potable water available for future projects in 2035, sufficient water supplies would be available to serve the proposed project and impacts would be <i>less than significant</i>. In addition, the General Plan 2035 also includes policies identified in the DEIR which require that an adequate amount of water supply be available to serve existing and future needs of the</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			city. The proposed project would also be required to comply with the standards for water efficient landscape design included in SRCC Chapter 14-30 in an effort to reduce water consumption in the city. Consistency with these regulations and additional water from groundwater wells would ensure that future development under the proposed project would reduce impacts to the City's water supply. (DEIR, pp. 4.14-8 to 9.)
<b>Impact UTIL-2:</b> Implementation of the proposed project would not require or result in the construction of new water facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.	No mitigation is necessary	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The proposed project's water demand would not exceed the available potable water in the city for the year 2035. As such, the project would not require the SCWA or the City to treat additional water beyond what is currently anticipated and would therefore, not prompt the need to expand treatment facilities in order to meet the demands. In addition, the General Plan 2035 includes policies (listed above) that would require the continued improvement and maintenance of water infrastructure. Accordingly, impacts would be <i>less than significant</i>. (DEIR, p. 4.14-9.)</p>
<b>Impact UTIL-3:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects,	No mitigation is necessary.	Less than significant	Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
would result in less than significant cumulative impacts with respect to water service.			<p><u>Explanation:</u> While the proposed project would contribute to an increase in the cumulative demand for water supply, the increased demand would not exceed Santa Rosa's existing and projected water supplies as described above. In addition, per the service agreement, each jurisdiction in the SCWA service is entitled to their respective water allotments through June 30, 2040. In addition, with SB X7 7 and the State, county, and local water conservation ordinances in place, each jurisdiction would be required to conserve its water use through establishing water efficiency measures. Therefore, the cumulative water demands would not exceed planned levels of supply beyond what is currently planned and cumulative impacts would be <i>less than significant</i>. (DEIR, p. 4.14-10.)</p>
Impact UTIL-4: Implementation of the proposed project would not exceed wastewater treatment requirements of the North Coast Regional Water Quality Control Board.	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The proposed project does not include any industrial land uses. The proposed park and recreational uses, multi-family residential, and commercial uses that would result from the adoption and implementation of the proposed project would not generate wastewater of different quality and treatability than that generated by current land uses in the city. The Laguna WTP is currently in compliance with its NDPEs permit</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>requirements. As such, potential future development under the proposed project would not be expected to generate wastewater that would exceed the treatment requirements of the North Coast RWQCB. In addition, the proposed project would be required to comply with State and local regulations to ensure that wastewater generated would not exceed the treatment requirements of the North Coast RWQCB. Therefore, the proposed project would result in a <i>less-than-significant</i> impact. (DEIR, p. 4.14-14.)</p>
<p><b>Impact UTIL-5:</b> Implementation of the proposed project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> While the increase in wastewater flows from implementation of the proposed project would add to the capacity demands on the Laguna WTP, the amount of wastewater generated would not exceed the remaining capacity and no new wastewater treatment facility would need to be constructed and no expansion of the Laguna WTP would be required.</p> <p>With respect to the City’s wastewater collection system, the Cross Town Trunk that would serve the Southeast Greenway Area requires upgrades in order to meet the City’s minimum level of service requirements under existing conditions. Therefore, because the Southeast Greenway Area was not identified for development in the City’s General Plan, any potential</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>added flow from future development in the Southeast Greenway Area was not incorporated into the City's current 2014 <i>Sanitary Sewer System Master Plan Update</i>. Accordingly, potential future development under the proposed project could exacerbate this existing condition and capacity improvements to the collection system and the Cross Town Trunk may be required. As part of the City's project approval process, future project developers in the Southeast Greenway Area, as with other development projects in the city, would be required to demonstrate project-specific impacts to the wastewater collection system, including the Cross Town Trunk, that may require upsizing or mitigating potential project-specific impacts. Future project developers would also be required to pay the City's wastewater fees for connecting to the sewer system to offset their fair share of impacts to the City's wastewater conveyance system. Once utility and pipelines projects are planned and the details are known, additional environmental review may be required. Furthermore, the General Plan 2035 includes policies such as Policy PSF-G-2, which requires the maintenance of existing levels of wastewater service by preserving and improving infrastructure, including replacing sewer mains as necessary to ensure existing levels of wastewater service are available. For these reasons, the proposed project would result in a <i>less-than-significant</i> impact with respect to the need for new or expanded wastewater collection facilities and its conveyance system. (DEIR, p. 4.14.-15.)</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
<p><b>Impact UTIL-6:</b> Implementation of the proposed project would not result in the determination by the wastewater treatment provider, which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The Laguna WTP has adequate capacity to serve the proposed new development potential under the proposed project; however, there are known deficiencies under existing conditions in the Cross Town Trunk that serves the Southeast Greenway Area. Future project developers would be required to demonstrate project-specific impacts to the wastewater collection system, including any potential impacts to the Cross Town Trunk. Once utility and pipelines projects are planned and the details are known, additional project-specific environmental review may be required. The development of improved wastewater collection systems could cause significant environmental effects; however, compliance with applicable regulations, as discussed above, and project-level environmental review would serve to evaluate and mitigate potential adverse physical effects from future project-level development. This combined with the ongoing compliance with General Plan 2035 Policy PSF-G-2, which requires the maintenance of existing levels of wastewater service by preserving and improving infrastructure, including replacing sewer mains as necessary, and payment of City's wastewater fees for connecting to the sewer system to offset their fair share of impacts to the City's wastewater</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			conveyance system would ensure impacts would be <i>less than significant</i> . (DEIR, p. 4.114-15.)
<p><b>Impact UTIL-7:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects would result in less than significant cumulative impacts with respect to wastewater service.</p>	No mitigation is necessary	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> While the proposed project would contribute to an increase in the cumulative demand for wastewater treatment, the increase represents less than 1 percent (0.5) of the remaining Laguna WTP capacity. As described above, the proposed project would not exceed wastewater treatment requirements of the North Coast RWQCB and would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. In addition, the Laguna WTP has adequate capacity to treat the wastewater generated by the proposed project. Accordingly, cumulative impacts to sanitary wastewater service would be <i>less than significant</i>. (DEIR, p. 4.-16.14.)</p>
<p><b>Impact UTIL-8:</b> Implementation of the proposed project would be serviced by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.</p>	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The total estimated solid waste generation for the</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			<p>proposed project would be 3,154 PPD or 1.6 tons per day, which represents less than 1 percent of the daily permitted capacity for Potrero Hills Landfill, Redwood Sanitary Landfill, and Keller Canyon Landfill. In addition, the proposed project would be required to comply with State and local regulations that require the reduction of solid waste production and promote recycling and composting of materials listed above. The General Plan 2035 also includes policies that ensure the City's solid waste disposal needs are met, while maximizing opportunities for waste reduction and recycling. Accordingly, buildout of the proposed project would have a <i>less-than-significant</i> impact with regard to daily capacity at each of the landfill facilities. (DEIR, p. 4.14-22.)</p>
<p><b>Impact UTIL-9:</b> Implementation of the proposed project would comply with federal, state and local statutes and regulations related to solid waste.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Potential future development under the proposed project would be required to comply with existing regulations, include the General Plan 2035 policies (listed above) that have been prepared to minimize impacts related to adequate waste collection and disposal facilities. Therefore, continued compliance with State and local policies, such as AB 939, and General Plan 2035 policies would ensure that impacts are less than significant with regards to solid waste and</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
			the impact would be <i>less than significant</i> . (DEIR, p. 4.14-23.)
<p><b>Impact UTIL-10.</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable development, would result in less than significant impacts with respect to solid waste.</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> While the proposed project would contribute to an increase in the cumulative demand for solid waste disposal, the increase represents less than 1 percent of the remaining at the Potrero Hills Landfill, Redwood Sanitary Landfill, and Keller Canyon Landfill. As described above, the proposed project would be served by a landfill with permitted capacity and would comply with federal, State, and local statutes and regulations related to solid waste. Accordingly, cumulative impacts to solid waste would be <i>less than significant</i>. (DEIR, p. 4.14-23.)</p>
<p><b>Impact UTIL-11:</b> Implementation of the proposed project would not result in a substantial increase in natural gas and electrical service demands, and would not require new energy supply facilities and transmission infrastructure or capacity enhancing alterations to existing</p>	<p>No mitigation is necessary.</p>	<p>Less than significant</p>	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> Implementation and adoption of the proposed project could result in new development potential up to 47.2 acres of park and recreational uses including open</p>

ENVIRONMENTAL IMPACT (SIGNIFICANCE BEFORE MITIGATION)	MITIGATION MEASURES	LEVEL OF SIGNIFICANCE AFTER MITIGATION	FINDINGS OF FACT
facilities.			space, 244 multi-family housing units, and 12,000 square feet of commercial space in the Southeast Greenway Area. The proposed increase in development would result in a long-term increase in energy demand, associated primarily with the operation of lighting and space heating/cooling in the added building space. In addition, construction activities associated with proposed development require the use of energy (e.g., electricity and fuel) for various purposes such as the operation of construction equipment and tools, as well as excavation, grading, demolition, and vehicle travel. As explained in detail in the Draft EIR, the following impacts would be less than significant: construction energy impacts, operation energy impacts, transportation energy impacts, and renewable energy impacts. (DEIR, pp. 4.14-33 to 35.)
<p><b>Impact UTIL-12:</b> Implementation of the proposed project, in combination with past, present and reasonably foreseeable development, would result in less than significant impacts with respect to energy conservation.</p>	No mitigation is necessary.	Less than significant	<p>Under CEQA, no mitigation measures are required for impacts that are less than significant. (Cal. Pub. Resources Code § 21002; CEQA Guidelines §§ 15126.4(a)(3), 15091.)</p> <p><u>Explanation:</u> The discussion under UTIL-11 described the proposed project's impacts in relationship to the PG&amp;E service territory and therefore includes a discussion of cumulative impacts. Impacts are less than significant without mitigation. (DEIR, p. 4.14-35.)</p>

## EXHIBIT B

### STATEMENT OF OVERRIDING CONSIDERATIONS

#### FOR THE SOUTHEAST GREENWAY GENERAL PLAN AMENDMENT AND REZONING PROJECT

##### X.

##### INTRODUCTION

The City of Santa Rosa ("City"), as lead agency, prepared an Environmental Impact Report ("EIR") for the Southeast Greenway General Plan Amendment and Rezoning Project (the "Project"). In its entirety, the EIR consists of the August 2017 Draft EIR ("Draft EIR" or "DEIR"), the January 2019 Revised Draft EIR ("RDEIR") and the May 2019 Final EIR ("Final EIR" or "FEIR"), (State Clearinghouse No. \_\_\_\_\_).

This Statement of Overriding Considerations has been prepared in accordance with the California Environmental Quality Act ("CEQA") (Cal. Pub. Resources Code § 21000 et seq.) and its implementing guidelines ("CEQA Guidelines") (Cal. Code Regs. Tit. 14, § 15000 et seq.)

##### XI.

##### STATEMENT OF OVERRIDING CONSIDERATIONS

As set forth in the preceding sections, the City of Santa Rosa's approval of the Project will result in significant adverse environmental effects that cannot be avoided even with the adoption of all feasible mitigation measures; and there are no feasible alternatives that would mitigate or substantially lessen the impacts. Despite the occurrence of these effects, however, the City Council, in accordance with CEQA Guidelines Section 15093, chooses to approve the Project because, in its view, the economic, social, and other benefits that the Project will provide will render the significant effects acceptable.

##### A. Significant and Unavoidable Impacts

As discussed in the EIR, the Project will result in the following potentially significant and unavoidable impacts, even with the implementation of all feasible mitigation measures:

---

##### SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT

---

##### Air Quality

**Impact AQ-2:** Despite implementation of the proposed Mitigation Measure AQ-2 identified in Chapter 4.2, Air Quality, of this Draft EIR, criteria air pollutant emissions associated with the proposed project would cause a substantial net increase in emissions that exceeds the Bay Area Air Quality Management District (BAAQMD) regional significance thresholds.

## SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT

---

### Air Quality

**Impact AQ-3:** Despite implementation of the proposed Mitigation Measure AQ-2 identified in Chapter 4.2, Air Quality, criteria air pollutant emissions associated with the proposed project would cause a substantial net increase in emissions that exceeds the BAAQMD regional significance thresholds and could cumulatively contribute to the non-attainment designations of the San Francisco Bay Area Air Basin (SFBAAB).

---

### Transportation and Circulation

**Impact TRANS-1a:** In order to improve operation to LOS D, the City should add an additional eastbound through lane onto Hoen Avenue Frontage Road, along with widening of Hoen Avenue Frontage Road downstream of the intersection to include two eastbound lanes.

---

**Impact TRANS-1b:** On Farmers Lane under Future plus Project conditions, the project is anticipated to cause a 1-mile per hour reduction in average southbound speeds during the PM peak hour, and is anticipated to cause operation to drop from LOS D to LOS E in the southbound direction during the AM peak hour.

---

**Impact TRANS-1c:** The Farmers Lane/Fourth Street-Sonoma Highway intersection (#1) is projected to operate unacceptably at LOS E during the AM and PM peak hours without the project and with the addition of project traffic would drop to LOS F during the AM peak hour.

---

## B. Findings

The City Council has considered all potentially feasible mitigation measures to substantially lessen or avoid the Project's significant and unavoidable impacts. Where feasible, mitigation measures have been adopted as part of the Project. The imposition of these measures will reduce the identified impacts, but not to a less-than-significant level. The City finds that it is not feasible to fully mitigate these impacts.

The City Council has also considered all potentially feasible alternatives to the Project. The City Council finds that there are no feasible alternatives that would reduce the above significant and unavoidable impacts to a less-than-significant level.

The Project's impacts discussed above therefore remain significant and unavoidable.

## C. Overriding Considerations

In the City Council's judgment, the Project and its benefits outweigh its unavoidable significant effects. The following statement identifies the specific reasons why, in the City Council's judgment, the benefits of the Project as approved outweigh its unavoidable significant effects. Any one of these reasons is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the City Council would stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this Exhibit B, and in the documents found in the Record of Proceedings, as defined in The Findings of Fact attached as Exhibit A to City Council Resolution No.\_\_\_\_.

The Project provides a unique opportunity for both the City of Santa Rosa and surrounding communities to achieve a variety of important goals that will benefit both the City

and the region. While the Project will create an attractive commercial use, it will also provide significant fiscal and economic benefits to the City of Santa Rosa.

Air Quality. By its very nature, air pollution is largely a cumulative impact. According to the Bay Area Air Quality Management District (BAAQMD), no single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. In developing thresholds of significance for air pollutants, the BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. According to the BAAQMD, if a project exceeds its identified significance thresholds, the project's impact would be cumulatively considerable. As stated under Air Quality Impacts AQ-2 and AQ-3 of the 2017 Draft EIR, despite implementation of the proposed mitigation, criteria air pollutant emissions associated with the proposed project would cause a substantial net increase in emissions that exceeds the BAAQMD regional significance thresholds and could cumulatively contribute to the non-attainment designations of the San Francisco Bay Area Air Basin (SFBAAB).

During the past few years the City of Santa Rosa has modified its planning policies and land use regulations to increase residential densities in the vicinity of rail and bus transit facilities and on other infill properties. This has resulted in accommodating the increase in population projected through the year 2035 within the same Urban Growth Boundary established to accommodate projected population to the year 2020. This land use pattern is designed to reduce automobile trips (and, therefore, vehicle miles traveled) and is supportive of a program of greenhouse gas reduction. Thus, a basis for a finding of overriding consideration is the fact that the proposed residential and commercial development sites identified and described in the EIR for the Southeast Greenway General Plan Amendment and Rezoning project will be located within walking distance of nearby services and transit options, as well as existing bicycle and pedestrian routes. Furthermore, the Illustrative Map, included in the EIR project description and the proposed General Plan text amendment, identifies proposed multi-use paths throughout the Southeast Greenway area, which would connect the park, residential and commercial areas to the City's existing bicycle and pedestrian system. The proposed land use layout supports the City's goals and policies related to greenhouse gas reduction.

Transportation and Circulation. The Farmers Lane Extension project, which would provide a connection from Bennett Valley Road south, connecting with Highway 101, is identified in the City's General Plan as a future project. While the project is long-term, an EIR has been completed, at least one source of funding is secure (Measure M sales tax), and preliminary construction drawings have been prepared. This extension is projected to alleviate congestion at the intersection of Highway 12 and Farmers Lane. However, because the project is not expected to be complete under near-term conditions, the impact of the Southeast Greenway General Plan Amendment and Rezoning project would be significant and unavoidable.

There are no further major capacity enhancements, identified for this area. While a number of commenters on the 2017 Draft EIR and the Revised Draft EIR suggested that the City reconsider the extension of Highway 12 through the Southeast Greenway area, that decision was

made by Caltrans (the property owner) on August 20, 2014. At that time, the California Transportation Commission adopted a resolution rescinding extension of Highway 12 due to lack of operational need, local support, and funding. As a result, long-range solutions to regional mobility must focus on better land use planning that support transit and alternative transportation modes; stronger jobs-housing balance; and increased support of transportation demand measures. The proposed General Plan goals and policies for the Southeast Greenway area emphasize each of these goals.

A basis for a finding of overriding consideration is the fact that for the City to facilitate residential development to accommodate its state-mandated share of regional housing needs, residential development within the City and Urban Growth Boundary and surrounding transit stations must continue to be allowed, and at higher densities. Commercial development, which also generates traffic, is also needed to provide services and jobs for current and future residents. Further, park and recreational space, including pathways connecting to existing bicycle and pedestrian routes, are necessary to serve the existing and future residents within the area, and to provide circulation for alternative modes of transportation. The Southeast Greenway General Plan Amendment and Rezoning project provides for a mix of residential and commercial development, in a manner that supports transit and encourages alternative transportation modes, minimizing traffic impacts to the greatest extent feasible, while utilizing the remaining area for needed open space and recreational use for the community.

**D. Determination and Adoption of Statement of Overriding Considerations**

The City Council has weighed the economic, legal, social, technological, and other benefits of the proposed Project, as set forth above, against the significant unavoidable impacts of the Project identified in the EIR (and discussed in the Findings of Fact and Table A to the Findings of Fact).

The City Council hereby determines that those benefits outweigh the risks and adverse environmental impacts of the Project, and further determine that the Project's significant unavoidable impacts are acceptable.

Accordingly, the City Council adopts the Statement of Overriding Considerations, recognizing that significant unavoidable impacts will result from implementation of the Project. Having (i) adopted all feasible mitigation measures, as discussed in the Environmental Impact Report; (ii) rejected alternatives to the Project, as discussed in the Environmental Impact Report; and (iii) recognized the significant unavoidable impacts of the Project, the City Council hereby finds that each of the separate benefits of the proposed Project, as stated herein, is determined to be unto itself an overriding consideration, independent of other benefits, that warrants approval of the Project and outweighs and overrides its significant unavoidable impacts, and thereby justifies the approval of the Project.

**EXHIBIT C**

**MITIGATION MONITORING AND REPORTING PROGRAM DATED MAY 6, 2019**

**MITIGATION MONITORING AND REPORTING PROGRAM**

<b>Mitigation Measures</b>	<b>Party Responsible for Implementation</b>	<b>Implementation Timing</b>	<b>Agency Responsible for Monitoring</b>	<b>Monitoring Action</b>	<b>Monitoring Frequency</b>
<b>AIR QUALITY</b>					
<b>AQ-2, AQ-3, AQ-5, and AQ-6:</b> Prior to issuance of construction permits, development project applicants that are subject to CEQA and exceed the screening sizes in the Bay Area Air Quality Management District's (BAAQMD) CEQA Guidelines shall prepare and submit to the City of Santa Rosa a technical assessment evaluating potential air quality impacts related to the project's operation phase. The evaluation shall be prepared in conformance with the BAAQMD methodology in assessing air quality impacts. If operation-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in BAAQMD's CEQA Guidelines, the City of Santa Rosa shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operation activities.	City of Santa Rosa	Prior to Construction	City of Santa Rosa Department of Public Works	Plan Review and Approval	During scheduled construction site inspections.
<b>AQ-4, AQ-5, and AQ-6:</b> Applicants for construction within 1,000 feet of residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) in the City of Santa Rosa, as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Santa Rosa prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM <sub>2.5</sub> concentrations exceed 0.3 µg/m <sup>3</sup> , or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include, but are not limited to:	City of Santa Rosa	Prior to future project approval	City of Santa Rosa Department of Public Works	HRA Review and Approval	Once

**MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
<ul style="list-style-type: none"> <li>▪ During construction, use of construction equipment fitted with Level 3 Diesel Particulate Filters (DPF) for all equipment of 50 horsepower or more.</li> <li>▪ Use of construction equipment fitted with Tier 3 engines for all equipment of 50 horsepower or more.</li> <li>▪ Equipment shall be properly serviced and maintained in accordance with manufacturer recommendations.</li> <li>▪ The construction contractor shall ensure that all non-essential idling of construction equipment is restricted to five minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.</li> </ul> <p>Measures identified in the HRA shall be included in the environmental document and/or incorporated into the site development plan as a component of the proposed project. Prior to issuance of any construction permit, the construction contractor shall ensure that all construction plans submitted to the City of Santa Rosa Planning Division and/or Building Division clearly show incorporation of all applicable mitigation measures.</p>					

**BIOLOGICAL RESOURCES**

<p><b>BIO-1a:</b> Ensure Avoidance of California Red-legged Frog. The following measures shall be implemented in locations within 100 feet of any drainage or seasonal wetland on the site to ensure avoidance of individual California red-legged frog (CRLF) in the remote instance individuals were to disperse onto the site in the future in advance of or during construction:</p> <ul style="list-style-type: none"> <li>▪ <i>Wildlife exclusion fence:</i> Wildlife exclusion fencing shall be installed prior to the start of construction and maintained until construction of the proposed project is complete. Such fencing shall, at a minimum, run along the proposed project boundaries with riparian habitat and for a distance of at least 100 feet perpendicular to riparian habitat. Silt fence material may be used to also provide erosion control, however, per CRLF standards, it must be at least 42 inches in height (at least 36 inches above ground and buried at least 6 inches below the ground) and stakes must be placed on the inside of the project (side on which work will take place).</li> <li>▪ <i>Pre-construction survey:</i> Pre-construction surveys for CRLF shall be conducted prior to initiation of project activities (including fence installation) and within 48 hours of the start of ground disturbance</li> </ul>	City of Santa Rosa	Prior to Construction During Construction	City approved biologist	Preconstruction Survey	During scheduled construction site inspections
---	--------------------	--	-------------------------	------------------------	--

**MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
<p>activities following completion of exclusion fence installation. Surveys are to be conducted by qualified biologists with experience surveying for CRLF.</p> <p>If project activities are stopped for greater than 7 days, a follow-up pre-construction survey may be required within 48 hours prior to reinitiating project activities.</p> <ul style="list-style-type: none"> <li>▪ <i>Worker Training:</i> All workers for activities within 100 feet of riparian habitat shall be trained by the qualified biologist to understand the remote potential for occurrence of this listed species, need to avoid any potential inadvertent take, and process to follow if a frog is encountered, that all work must stop and the qualified biologist must determine whether it is CRLF before work proceeds.</li> <li>▪ <i>Earth Disturbing Activities only during dry weather:</i> No earth disturbing activities shall take place during rain events when there is potential for accumulation greater than 0.25 inch in a 24-hour period. In addition, no earth disturbing activities shall occur for 48 hours following rain events in which 0.25 inch of rain accumulation within 24 hours.</li> <li>▪ <i>Biological monitoring:</i> An approved biologist shall be required to inspect and approve installation of the exclusion fence.</li> <li>▪ <i>Erosion Control Materials:</i> Tightly woven fiber netting or similar material shall be used for erosion control or other purposes to ensure amphibians do not get trapped. Plastic mono-filament netting (erosion control matting), rolled erosion control products, or similar material shall not be used.</li> </ul>	City of Santa Rosa	Prior to construction	City-approved botanist	Systematic surveys of special- status plant species	Seasonally
<p><b>BIO-1b:</b> Appropriate measures shall be implemented to ensure adequate avoidance of special-status plant species, if present in the remaining natural areas on the project site east of Summerfield Road. A qualified botanist shall conduct systematic surveys of the portion of the project site east of the Summerfield Road in spring and summer months to confirm absence of any special-status plant species on the site. The survey shall focus on the special-status plant species considered to have a remote probability for occurrence on the project site. The surveys shall be completed and a report of findings submitted to the City before the onset of any initial ground-disturbing activity or construction associated with project implementation.</p>					

**MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
<p>If any special-status plant species are encountered, then any occurrence(s) shall be avoided or potential impacts adequately mitigated as part of potential future project development. The qualified botanist shall develop and implement a Special-Status Plant Species Mitigation and Monitoring Program (SSPSMMP). The SSPSMMP shall only be required if a listed species or those with a ranking of 1A, 1B or 2 of the California Native Plant Society (CNPS) Inventory are encountered during the preconstruction survey. Potential impacts on any species with a ranking of 3 and 4 of the CNPS Inventory would not be considered significant and no additional mitigation would be required for these species if encountered during the systematic survey(s).</p> <p>The SSPMMP shall be prepared in consultation with the California Department of Fish and Wildlife (CDFW) and shall be approved by the City prior to any initial ground-disturbing activity or construction. The SSPMMP shall be based on the status and vulnerability of the species present, with avoidance of all or a majority of any populations on the site the preferred method of mitigation. Where complete or even partial avoidance of any special-status plant populations on the site is considered infeasible, options for mitigation may include a program to salvage and reestablish the population at an alternative, suitable location. Details of any salvage and habitat recreation effort shall include the following criteria and performance standards measures may include:</p> <ul style="list-style-type: none"> <li>▪ Collection of seeds during the appropriate developmental stage of the plan.</li> <li>▪ Procedures for sowing techniques appropriate to the life cycle of the plant.</li> <li>▪ Preparation of a maintenance and monitoring plan specific to the environmental conditions necessary for survival of the new population. Maintenance and monitoring shall be provided for a minimum of five years to determine success of re-seeding and habitat creation, and need for additional preservation.</li> <li>▪ Identification of funding sources to provide implementation of the plan in consultation with the qualified plant ecologist, landscape architect, and civil engineer.</li> </ul>					
<p>In addition, preservation of another existing occurrence of the affected special-</p>					

**MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
<p>status plant species shall be required if monitoring indicates that the reestablishment efforts have not been successful after five years. The preservation program shall provide for permanent protection of a different existing population in Sonoma County, which is equal or larger in size than that encountered on the site (minimum 1:1 replacement), through land acquisition or use of a conservation easement. Any off-site mitigation lands shall include establishment of a management endowment as necessary to provide for long-term management of the preserved population.</p>					
<p><b>BIO-1c:</b> Ensure Avoidance of Bird Nests in Active Use. Tree removal, landscape grubbing, and building demolition shall be performed in compliance with the Migratory Bird Treaty Act and relevant sections of the California Department of Fish and Wildlife (CDFW) code to avoid loss of nests in active use. This shall be accomplished by scheduling tree removal and landscape grubbing outside of the bird nesting season (which occurs from February 1 to August 31) to avoid possible impacts on nesting birds if new nests are established in the future. Alternatively, if building demolition, tree removal and landscape grubbing cannot be scheduled during the non-nesting season (September 1 to January 31), a pre-construction nesting survey shall be conducted. The pre-construction nesting survey shall include the following:</p> <ul style="list-style-type: none"> <li>▪ A qualified biologist (Biologist) shall conduct a pre-construction nesting bird (both passerine and raptor) survey within seven calendar days prior to tree removal, landscape grubbing, and/or building demolition.</li> <li>▪ If no nesting birds or active nests are observed, no further action is required and tree removal, landscape grubbing, and building demolition shall occur within seven calendar days of the survey.</li> <li>▪ Another nest survey shall be conducted if more than seven calendar days elapse between the initial nest search and the beginning of tree removal, landscape grubbing, and building demolition.</li> <li>▪ If any active nests are encountered, the Biologist shall determine an appropriate disturbance-free buffer zone to be established around the nest location(s) until the young have fledged. Buffer zones vary depending on the species (i.e., typically 75 to 100 feet for passerines and 300 feet for raptors) and other factors such as ongoing disturbance in the vicinity of the nest location. If necessary, the dimensions of the buffer zone shall be determined in consultation with the CDFW.</li> </ul>	City of Santa Rosa	Prior to construction	City-approved biologist	Pre-construction nesting survey	Once

**MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
<ul style="list-style-type: none"> <li>▪ Orange construction fencing, flagging, or other marking system shall be installed to delineate the buffer zone around the nest location(s) within which no construction-related equipment or operations shall be permitted. Continued use of existing facilities such as surface parking and site maintenance may continue within this buffer zone.</li> <li>▪ No restrictions on grading or construction activities outside the prescribed buffer zone are required once the zone has been identified and delineated in the field and workers have been properly trained to avoid the buffer zone area.</li> <li>▪ Construction activities shall be restricted from the buffer zone until the Biologist has determined that young birds have fledged and the buffer zone is no longer needed.</li> </ul>					
<p>A survey report of findings verifying that any young have fledged shall be submitted by the Biologist for review and approval by the City prior to initiation of any tree removal, landscape grubbing, building demolition, and other construction activities within the buffer zone. Following written approval by the City, tree removal, and construction within the nest-buffer zone may proceed.</p>					
<p><b>BIO-3: Provide Compensatory Mitigation for Wetland Modifications.</b> The City shall require future project applicants to develop and implement a compensatory mitigation program to provide adequate mitigation for jurisdictional waters affected by proposed improvements in the Southeast Greenway Area for submittal to the City. A jurisdictional wetland delineation shall be prepared by a qualified wetland specialist and submitted for verification by the United States Army Corps of Engineers (USACE) where jurisdictional waters may be affected by project-related improvements. A Wetland Protection and Replacement Program (WPRP) shall be prepared by the qualified wetland specialist and implemented to provide compensatory mitigation at a minimum 2:1 ratio where wetland habitat is affected, shall minimize disturbance to unvegetated waters, and shall be reviewed and approved by appropriate regulatory agencies (e.g., USACE, Regional Water Quality Control Board (RWQCB) and the California Department of Fish and Wildlife (CDFW). The WPRP shall include appropriate implementation measures to prevent inadvertent loss and degradation of jurisdictional waters to be protected, and replacement for those wetland features eliminated or modified as a result of potential future project development. The WPRP shall</p>	City of Santa Rosa	Prior to approval of future projects	City-approved wetland specialist	Jurisdictional wetland delineation	Once when new development is proposed

**MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
contain the following components:					
<ul style="list-style-type: none"> <li data-bbox="180 380 884 711">▪ Where verified waters of the United States are present and cannot be avoided, authorization for modifications to these features shall be obtained from regulatory agencies with jurisdiction. This includes the USACE through the Section 404 permitting process where waters of the United States are affected by the potential future project development and the RWQCB as part of the Section 401 Certification process. Together with a Streambed Alteration Agreement (SAA) secured from CDFW, if required as part of the SAA Notification process for proposed fills to the man-made ditch and possibly the pond on the golf course. All conditions required as part of the authorizations by the USACE, RWQCB, and CDFW shall be implemented as part of the project.</li> <li data-bbox="180 721 884 883">▪ Consultation or incidental take permitting may be required under the California and federal Endangered Species Acts. Future project applicants shall obtain all legally required permits or other authorizations from the USFWS, National Marine Fisheries Service (NOAA Fisheries), and CDFW for the potential “take” of protected species under the Endangered Species Acts.</li> <li data-bbox="180 893 884 1143">▪ Install orange construction fencing around the boundary of all wetland areas and waters to be preserved at the interface with proposed fills and grading so that they are not disturbed during construction. The fencing shall be placed a minimum of 25 feet out from the boundary of the wetlands/waters but may need to be adjusted if restoration activities are to be conducted within this area. Grading, construction, and restoration work within the wetland/waters buffer zones shall be conducted in a way that avoids or minimizes disturbance of existing wetlands and aquatic habitat.</li> <li data-bbox="180 1153 884 1234">▪ A qualified biologist/restoration specialist shall be available during construction to provide situation-specific wetland avoidance measures or planting recommendation, as needed.</li> <li data-bbox="180 1243 884 1404">▪ Success criteria, maintenance and long-term management responsibilities, monitoring requirements, and contingency measures in the WPRP should be specified. Monitoring shall be conducted by the qualified wetland specialist for a minimum of five years and continue until the success criteria are met. Permanent monitoring transects shall be established as part of the program and vegetation</li> </ul>					

**MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
<p>data collected in the spring and summer months when plant identification is possible. Photo stations shall be established along each monitoring transect, and photographs taken every year during the required monitoring period.</p> <p>Annual monitoring reports shall be prepared by the qualified wetland specialist and submitted to resource agency representatives by December 31 of each monitoring year for a minimum of 5 years or until the defined success criteria are met. The annual report shall summarize the results of the monitoring effort, performance standards, and any required contingency measures, and shall include photographs of the monitoring transects and program success. Maps shall be included in the monitoring report to show the location of monitoring transects and photo stations.</p>					

**CULTURAL AND TRIBAL CULTURAL RESOURCES**

<p><b>CULT-2 and CULT-6:</b> If any prehistoric or historic subsurface cultural resources are discovered during ground disturbing activities, all work within 50 feet of the resources shall be halted and a qualified archaeologist shall be consulted. If the resource is a tribal resource – whether historic or prehistoric – the City shall consult with the appropriate tribe(s) to evaluate the resource and determine appropriate avoidance, preservation or mitigation measures. If the resource is non-tribal, the archaeologist shall assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, representatives from the City and the archaeologist would meet to determine the appropriate avoidance measures or other appropriate mitigation. All significant non-tribal cultural materials recovered shall be, as necessary and at the discretion of the consulting archaeologist, subject to scientific analysis, professional museum curation, and documentation according to current professional standards. Where the materials are tribal, the City shall consult with the appropriate tribe(s) to determine what types of testing and preservation are acceptable. In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to tribal cultural resources, historical resources or unique archaeological resources, the City, in consultation with the tribe(s) where appropriate, shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, proposed project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) may be instituted. Work may proceed on other parts of the</p>	City of Santa Rosa	During ground disturbing construction activities	City-approved Archaeologist	Contacting appropriate tribe(s)	Ongoing
---	--------------------	--	-----------------------------	---------------------------------	---------

**MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
project site while mitigation for tribal cultural resources, historical resources or unique archaeological resources is being carried out.					
<p><b>CULT-3 and CULT-6:</b> In the event that fossils or fossil-bearing deposits are discovered during construction, excavations within 50 feet of the find shall be temporarily halted or diverted. The contractor shall notify a qualified paleontologist to examine the discovery. The paleontologist shall document the discovery as needed, in accordance with Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology 1995), evaluate the potential resource, and assess the significance of the finding under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important. The plan shall be submitted to the City for review and approval prior to implementation.</p>	City of Santa Rosa	During ground disturbing construction activities	City-approved Paleontologist	Notify appropriate agencies	Ongoing
<p><b>CULT-4 and CULT-6:</b> Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5(e) (CEQA). According to the provisions in CEQA, if human remains are encountered at the site, all work in the immediate vicinity of the discovery shall cease and necessary steps to ensure the integrity of the immediate area shall be taken. The Sonoma County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies as the Most Likely Descendant (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.</p>	City of Santa Rosa	During ground disturbing construction activities	Sonoma County Coroner	Contact the MLD	Ongoing

**MITIGATION MONITORING AND REPORTING PROGRAM**

<b>Mitigation Measures</b>	<b>Party Responsible for Implementation</b>	<b>Implementation Timing</b>	<b>Agency Responsible for Monitoring</b>	<b>Monitoring Action</b>	<b>Monitoring Frequency</b>
<b>CULT-5a and CULT-6:</b> Implement Mitigation Measure CULT-2	City of Santa Rosa	During ground disturbing construction activities	City-approved Archaeologist	Contacting appropriate tribe(s)	Ongoing
<b>CULT-5b and CULT-6:</b> Implement Mitigation Measure CULT-4.	City of Santa Rosa	During ground disturbing construction activities	Sonoma County Coroner	Contact the MLD	Ongoing
<b>TRANSPORTATION AND CIRCULATION</b>					
<b>TRANS-1a and TRANS-1e:</b> In order to improve operations to an LOS D in the near-term, an additional eastbound through-lane from the SR 12 eastbound off-ramp onto Hoen Avenue Frontage Road could be added and Hoen Avenue Frontage Road could be widened downstream of the intersection to include two eastbound lanes.	City of Santa Rosa	In the future	City of Santa Rosa Department of Public Works	Adding capacity on roadway	Once
<b>TRANS-1b.1 and TRANS-1c.:</b> The Farmers Lane/Fourth Street-Sonoma Highway intersection (#1) could be widened in the future to include dual northbound right-turn lanes and triple westbound left-turn lanes, including widening of Farmers Lane to provide three southbound lanes for a distance of approximately 350 feet south of the intersection, or otherwise modified as determined appropriate by the City Traffic Engineer to provide equivalent or superior operation. This is a major roadway and bridge widening project that would affect traffic flow and operations on circulation facilities that are owned and maintained by Caltrans, as well as additional environmental review including assessment of potential impacts to Santa Rosa Creek, and would require substantial review and approval of any modifications by Caltrans.	City of Santa Rosa	In the future	City of Santa Rosa Department of Public Works	Adding capacity on roadway	Once
<b>TRANS-1b.2:</b> The City shall consult with Caltrans to modify the signal phasing at the Farmers Lane/Hoen Avenue intersection (#5) in the future to include protected-permitted left-turn phasing on Hoen Avenue, or otherwise modified as determined appropriate by the City Traffic Engineer to provide equivalent or superior operation.	City of Santa Rosa	Prior to future construction	City of Santa Rosa Department of Public Works	Consult with Caltrans	Once

## MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
<b>TRANS-1d:</b> The City shall ensure that a traffic signal is installed at the intersection of Hoen Avenue/Franquette Avenue in the future. The City’s Department of Transportation and Public Works should monitor operations at the intersection through field observation and review of development traffic impact studies to assure signalization of the intersection either through future development requirements or as part of the City’s Capital Improvement Program once the City Traffic Engineer determines that signalization is warranted.	City of Santa Rosa	In the future	City of Santa Rosa Department of Public Works	Installation of traffic signal and other minor operations improvements	Once
<b>TRANS-6a.1:</b> The mid-block multi-use pathway crossings on Summerfield Road and Yulupa Avenue should include, at a minimum, an active pedestrian warning system (such as, but not limited to, pedestrian-activated flashing beacons or rapid rectangular flashing beacons) as well as high-visibility crosswalk markings.	City of Santa Rosa	During construction of multi-use pathway	City of Santa Rosa Department of Public Works	Installing an active pedestrian warning system	Once
<b>TRANS-6a.2:</b> The mid-block multi-use pathway crossing on Franquette Avenue should include, at a minimum, high-visibility crosswalk markings and signs.	City of Santa Rosa	During construction of multi-use pathway	City of Santa Rosa Department of Public Works	Installing high visibility crosswalk markings and signs	Once
<b>TRANS-6a.3:</b> The multi-use pathway crossing at the Hoen Avenue/Hoen Avenue Frontage Road-Cypress Way signalized intersection should include, at a minimum, new high-visibility crosswalk markings and signal phasing to serve pedestrians and bicyclists, as well as signage (such as “Yield to Bikes” signs) alerting drivers to the presence of bike crossings.	City of Santa Rosa	During construction of multi-use pathway	City of Santa Rosa Department of Public Works	Installing high visibility crosswalk markings and signal phasing	Once
<b>TRANS-6a.4:</b> The ultimate configuration of multi-use pathway street crossing designs, including selection of warning devices if appropriate, shall be determined by the City’s Traffic Engineer, in consideration of the physical characteristics of each site and best design practices that exist at the time the design is initiated.	City of Santa Rosa	During design phase	City of Santa Rosa Traffic Engineer	Ensuring street crossing designs include selection of warning devices	When new development is proposed
<b>TRANS-6b:</b> The City shall ensure that whatever entity ultimately constructs the pedestrian and bicycle circulation facilities to cross the SR 12 Westbound On-ramp obtains an encroachment permit and design approval from Caltrans prior to implementing either of the new pedestrian-bicycle crossing options, and shall oversee the preparation of preliminary designs and studies needed for Caltrans review.	City of Santa Rosa	Prior to implementing new pedestrian-bicycle crossing	City of Santa Rosa and Caltrans	Ensure Caltrans reviews encroachment permit and design approval	Once

## MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measures	Party Responsible for Implementation	Implementation Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency
<p><b>TRANS-6c.1:</b> If an at-grade pedestrian crossing is to be implemented at Hoen Avenue Frontage Road/SR 12 Westbound On-ramp intersection, the intersection would need to be modified to include, at a minimum, the following components:</p> <ul style="list-style-type: none"> <li>▪ Signal or pedestrian hybrid beacon with an exclusive phase for pedestrian-bicycle movements</li> <li>▪ Horizontal realignment that regulates vehicle speeds to no greater than 35 mph at the crossing</li> <li>▪ Maintained clear line of sight between drivers and pedestrians/bicyclists on the crossing</li> <li>▪ Right-turn pocket on westbound Hoen Avenue Frontage Road to provide vehicle queue storage</li> </ul>	City of Santa Rosa	If an at-grade pedestrian crossing is to be implemented	City of Santa Rosa Department of Public Works	Providing of specified components	Once
<p><b>TRANS-6c.2:</b> The ultimate configuration of any at-grade pedestrian crossing at the Hoen Avenue Frontage Road/SR 12 Westbound On-ramp intersection shall be evaluated and determined by the City's Traffic Engineer, in collaboration with Caltrans, and in consideration of the physical characteristics the site and best design practices that exist at the time the design is initiated. The City shall ensure an encroachment permit and design approval from Caltrans is obtained prior to implementing the new pedestrian crossing.</p>	City of Santa Rosa	If an at-grade pedestrian crossing is to be implemented	City of Santa Rosa Department of Public Works	Providing of specified components	Once
<p><b>TRANS-6d:</b> Prior to commencement of construction activities, applicants seeking to construct projects within the Southeast Greenway Area shall submit a construction traffic control plan to the City of Santa Rosa for review and approval. The proposed project 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. If necessary, movement of major construction equipment and materials shall be limited to off-peak hours to avoid conflicts with local traffic circulation.</p>	City of Santa Rosa	Prior to commencement of construction activities	City of Santa Rosa Department of Public Works	Submit a construction traffic control plan	Once

DRAFT