



Memorandum

DATE: September 24, 2021

TO: Jen Santos, Deputy Director, City of Santa Rosa Recreation and Parks Department

FROM: Will Burns, AICP, Principal Project Manager

SUBJECT: Initial Study/Mitigated Negative Declaration for the Roseland Creek Community Park Project – Response to Late Comment Letter

A late comment letter was received on the draft Initial Study/Mitigated Negative Declaration (MND) for the Roseland Creek Community Park project, subsequent to the conclusion of the 30-day public comment period on December 18, 2019. The late comment letter was received from Lozeau Drury LLP on September 20, 2021.

David J. Powers & Associates has reviewed the Lozeau Drury letter and has determined that the comments received do not raise any significant new information or substantial evidence in light of the whole record to warrant recirculation of the MND per CEQA Guidelines 15073.5 or preparation of an environmental impact report per CEQA Guidelines 15064. The comments do not provide substantial evidence to support a fair argument that the project would result in a significant effect on the environment that was not previously disclosed and analyzed in the Initial Study/MND nor do they represent a disagreement among experts. Although CEQA requires the City to “consider” public comments on a negative declaration, CEQA does not require written responses to such comments [CEQA Guidelines 15074(b)]. Moreover, CEQA does not require the City to respond to late comment letters. Nevertheless, City staff has requested that, a more detailed written response to each of the comments from Lozeau Drury LLP be prepared and is provided below.

I. RESPONSES TO COMMENTS

Summary of Comments from Lozeau Drury (dated September 20, 2021):

1. IS/MND is incomplete and inaccurate in characterizing environmental setting for wildlife
2. IS/MND narrowly characterizes species’ habitats
3. IS/MND fails to fully analyze degree of habitat loss
4. IS/MND fails to address cumulative impacts of past, ongoing, and future projects on wildlife
5. IS/MND mitigation measures are insufficient to address potential impacts

Response:

The comment letter (including attachments) is over 80 pages in length. The explanation and rationalization for potential impacts by the project provided in the comment letter are speculative;

reference information irrelevant to the project, project site, or surrounding area; unsubstantiated; and based on conjecture. The below responses exemplify this and explain in detail why the comments do not represent substantial evidence that the project would result in a new significant impact not previously disclosed in the Initial Study/MND. None of the project impacts, mitigation, or impact conclusions warrant revision based on the comments received.

Judicial review of a Mitigated Negative Declaration (“MND”) applies the fair argument standard. The commentor “has the burden of proof to demonstrate by citation to the record the existence of substantial evidence supporting a fair argument of significant environmental impact.” (*Parker Shattuck Neighbors v. Berkeley City Council* (2013) 222 Cal.App.4th 768, 778.) “[S]ubstantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact.” (Pub. Resources Code, § 21080, subd. (e)(1).) “Substantial evidence is not argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment.” (§ 21080, subd. (e)(2); *Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal.App.5th 161, 192.) “Unless the administrative record contains [substantial] evidence, and [plaintiffs] cite[] to it, no ‘fair argument’ that an EIR is necessary can be made.” (*South Orange County Wastewater Authority v. City of Dana Point* (2011) 196 Cal.App.4th 1604, 1612–1613.) Moreover, even under the fair argument standard, a court “must give the lead agency the benefit of the doubt on any legitimate, disputed issues of credibility.” (*Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 692.)

1. IS/MND is incomplete and inaccurate in characterizing environmental setting for wildlife

The commentor’s biologist (Dr. Smallwood) identified 38 species of vertebrate wildlife during his site visit, 35 of which are endemic to the project area which led him to conclude the site is relatively intact from an ecological perspective and rich in wildlife. Dr. Smallwood also forecast that additional surveys conducted throughout the day would have led to the observation of many additional species. Dr. Smallwood acknowledged that he did not observe any special-status species during his site visit but with additional survey efforts believes he would have observed these species. Although the site may contain many endemic species, in the absence of observed special-status species, the presence of native species would not necessarily afford them additional protection under CEQA nor result in a new impact. The commentor’s assertion that special-status wildlife species would likely be observed with additional survey effort is speculation.

The City’s biological consultant, WRA has more than four decades of experience conducting biological resources assessments to inform the environmental review process and employs qualified biologists to perform assessments on the behalf of their clients. WRA has performed hundreds of biological resource assessments, similar to the one performed for this project. The CEQA process does not require a full reporting of the specific details highlighted by Dr. Smallwood to establish validity of an assessment, contrary to what is asserted in his letter. The 2019 WRA Biological Resources Assessment included a detailed methods section describing the approach used to conduct the survey. It describes its limitations as: “*This site assessment is intended to identify the presence or absence of suitable habitat for each special-status species known to occur in the vicinity in order to determine its potential to occur in the Project Area. The site visit does not constitute a*

protocol-level survey and is not intended to determine the actual presence or absence of a species; however, if a special-status species is observed during the site visit, its presence will be recorded and discussed." This general approach has been employed by WRA for the purpose of biological evaluations to support CEQA review for decades and has been upheld through precedence.

As clearly stated in the Initial Study, Biological Resources Assessment, Special-status Plant Survey, and Tree Survey, WRA biologists visited the project site initially in May 2017 with multiple follow up surveys in 2018. Prior to the initial site visit, WRA reviewed the California Natural Diversity Database (CNDDDB) and nine additional sources from the USFWS, CDFG, CNPS, and local Sonoma County publications. Protocol-level surveys were subsequently completed, as warranted, to assess the potential for special-status plant species on-site. As detailed in the Initial Study, the multiple site visits and review of reputable biological resource publications provided a clear baseline for WRA to assess the potential for biological resource impacts from the project and appropriate mitigation measures.

Dr. Smallwood's assertion that the literature review was flawed is not substantiated by evidence. While numerous data sources may be available, CEQA does not require that all data sources are reviewed in order to evaluate impacts to biological resources. Query of the CNDDDB is the primary data source for evaluating potential for individual occurrences because it is curated and the quality of the data can be evaluated. Other databases such as eBird or iNaturalist, may be used at the discretion of the evaluating biologist, in some cases, but their use is not obligatory. The recommended approach described by Dr. Smallwood ignores precedence, which holds that "*CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project. The fact that additional studies might be helpful does not mean that they are required,*" Gray v. County of Madera (2008) 167 Cal.App.4th 1099, 1125 (quoting Association of Irrigated Residents v. County of Madera (2003) 107 Cal.App.4th 1383, 1396).

With regard to the disparity in numbers of detected wildlife highlighted by Dr. Smallwood, because wildlife is not sedentary or limited to the confines of a particular study area, it would be expected that site visits documenting wildlife would be variable based on a number of factors, which may include time of day, time of year, weather, length of survey etc. and play a role in the number of species that would be detected. Upon review of Dr. Smallwood's observed species list, we do not dispute that these species would be expected to be on the site. However, this difference in detected species does not amount to evidence that the WRA findings are not adequate. Though direct species observations may inform the evaluation of impacts at a site, it is not essential to the process, regardless of Dr. Smallwood's opinion.

2. IS/MND narrowly characterizes species' habitats

California tiger salamander habitat

Dr. Smallwood also claims that the potential for California tiger salamander habitat was inaccurately characterized. Dr. Smallwood suggests surveys for CTS should have been conducted on private property south of the project site. The City does not have the ability to conduct surveys for special-status species on private property unrelated to the proposed project. The comment essentially asserts that species should be presumed present unless

proven absent both on the site and on adjacent sites. However, this premise is incorrect and comments that imply otherwise are incorrect, again: “*CEQA does not require a lead agency to conduct every recommended test and perform all recommended research to evaluate the impacts of a proposed project. The fact that additional studies might be helpful does not mean that they are required,*” Gray v. County of Madera (2008) 167 Cal.App.4th 1099, 1125 (quoting Association of Irrigated Residents v. County of Madera (2003) 107 Cal.App.4th 1383, 1396).

CTS are widely accepted to be dependent on fossorial mammal burrows. Though they may use expansion cracks in soils, WRA is unaware of any examples of populations of CTS persisting in areas where no fossorial mammals are present and the species relies entirely on expansion cracks in soils. Dr. Smallwood did not present any examples of such populations in his letter. Dr. Smallwood did not find fossorial mammal burrows on the site, nor did he identify suitable expansion cracks in the soil that would support CTS. He did provide one image of a CTS crawling on the surface near an expansion crack at a site in a different region, which is irrelevant and misleading to this project setting and scope. This comment relies on speculation based on the unsubstantiated narrative that the project will have a significant wildlife impact. Under CEQA Guidelines Section 15384, “argument, speculation, [or] unsubstantiated opinion or narrative” does not constitute substantial evidence. The comment does not provide substantial evidence that the County has failed to adequately address impacts to wildlife from the project and only provides speculation that impacts would occur, and further speculates that these impacts would be considered significant under CEQA.

Regardless, WRA’s determination that CTS is unlikely to occur on the project site was based on USFWS guidance related to their designation of critical habitat as well as published sources that were cited in the Biological Resources Assessment. Moreover, the IS/MND conservatively identified a significant impact to CTS and identified appropriate mitigation to reduce the impact to a less than significant level consistent with the Santa Rosa Plain Conservation Strategy and Programmatic Biological Opinion. The IS/MND determined that the project would not result in significant impacts to wildlife with the incorporation of mitigation measures and no evidence to contradict this determination has been provided.

Incorrect conclusions about breeding habitat

Dr. Smallwood’s assertion that all of a species’ habitat is of critical importance regardless of where breeding sites are located is fundamentally flawed and lacks substantiated evidence. Following this logic would lead reviewers to believe that all development would be a significant impact to wildlife, which is inaccurate. Standard practices for evaluating whether or not a project will have a significant impact under CEQA utilize a complete understanding of an individual species’ natural history to determine potential impacts and assess the significance of an impact. Suggesting that all habitat is critical and that certain factors such as breeding site suitability should not carry greater weight in an assessment of potential impact to a species represents an incorrect opinion that is not supported by science. This comment relies on speculation based on the unsubstantiated narrative that the project will have a significant wildlife impact. Under CEQA Guidelines Section 15384, “argument, speculation, [or] unsubstantiated opinion or narrative” does not constitute substantial evidence. The comment does not provide substantial evidence that the City has failed to adequately address

impacts to wildlife from the project and only provides speculation that impacts would occur, and further speculates that these impacts would be considered significant under CEQA. The IS/MND determined that the project would not result in significant impacts to wildlife with the incorporation of mitigation measures and no evidence to contradict this determination has been provided.

Northern California black walnut habitat

The Northern California black walnut (*Juglans hindsii*) trees did not warrant characterization as a woodland or savanna community type, as the estimated cover of the dead and dying Northern California black walnut trees was determined to be less than ten percent vegetative cover, surrounded by non-native annual grasses and occasional shrubs. The stand of walnut trees also does not constitute a native, and therefore sensitive woodland or savanna community, as historic aerial imagery (Sonoma County Vegetation Mapping and Lidar Program 1942 aerial image) indicates that the entire site previously consisted of orchards. It is presumed that the existing trees are left over from the site's agricultural past, as this species was typically used as rootstock for English walnut (*J. regia*) orchards. The assertion that the old, decadent trees are "more valuable to species, which take advantage of cavities in the trees to create granaries and nests", although potentially valid, relies on speculation based on the unsubstantiated narrative that the project will have a significant wildlife impact.

Dr. Smallwood highlights that the number of special status species he determined to have potential to be on-site is higher and more "optimistic" than the number evaluated by WRA. However, a large number of those species, (e.g. birds of prey) are not considered special-status species by the City of Santa Rosa or other CEQA lead agencies including the County of Sonoma. No habitat evaluation criteria seem to be considered in Dr. Smallwood's assessment for the potential presence of special-status species. Dr. Smallwood does not qualify his assessment of the potential presence of special-status species with supporting evidence. Further, he does not provide any evidence that if these species are present, that they would be substantially impacted by the project. As such, this comment relies on speculation based on the unsubstantiated narrative that the project will have a significant wildlife impact. Under CEQA Guidelines Section 15384, "argument, speculation, [or] unsubstantiated opinion or narrative" does not constitute substantial evidence. The comment does not provide substantial evidence that the City has failed to adequately address impacts to wildlife from the project and only implies that this has occurred. The IS/MND determined that the project would not result in significant impacts to wildlife with the incorporation of mitigation measures and no evidence to contradict this determination has been provided.

3. IS/MND fails to fully analyze degree of habitat loss

Dr. Smallwood suggests the IS/MND inaccurately calculates the acreage of mitigation required for CTS habitat by applying the requirements of a conservation easement for 1400 Burbank Avenue (*i.e.* no more than 20 percent impervious surfaces) to the entire park property. The IS/MND clearly states in the same discussion (pgs. 8 and 89-90) that the conservation easements on 1027 McMinn Avenue and 1360 Burbank Avenue restrict impervious surfaces to five percent. The discussion of impervious surfaces in this context shows the project's conformance to and lack of conflict with the existing conservation easements on the property which also allow for the proposed park uses.

Although the site is within the area designated as critical habitat for CTS, and perhaps counter-intuitively, this designation does not mean that habitat for the species currently exists on the site. The mitigation proposed for CTS critical habitat, as described in the Biological Resources Assessment, is in conformance with the ratios prescribed for projects on the Santa Rosa Plain in accordance with the Santa Rosa Plain Conservation Strategy, the primary tool used for determining mitigation ratios in this area.

Impacts to the approximately 19.49-acre site at the time of the Biological Resource Assessment were anticipated to be 1.37 acres, when accounting for some areas already covered by impermeable surfaces. As part of the project, some of these impermeable areas will be removed. Based on the design shown on Figure 4 of the Biological Resources Assessment, the majority of the site would remain as it is, with formal trails installed in such a way that is likely to benefit wildlife by allowing the numerous haphazard trails that currently exist to rehabilitate/revegetate. Impact areas are centered around existing hardscape or along the periphery of the site. Considering this, impacts to wildlife, especially the species that have been documented to occur on the site, (which are all species adapted to disturbance and urban settings) and those evaluated as having potential to occur on the site by both WRA and Dr. Smallwood, will not be significantly impacted by the project. It is likely that some will benefit from the project. There is no evidence to suggest that the project will have a substantial adverse impact on wildlife. Dr. Smallwood's assertion that the project could lead to about 44,000 fewer birds in California over the next century does not consider the type of project that is proposed, the species that would be impacted (the cited studies are sited in the upper Midwest of the United States) and the approach taken to come to this number is outside of the standards by which CEQA evaluations are conducted. As such, this comment relies on speculation based on the unsubstantiated narrative that the project will have a significant wildlife impact. Under CEQA Guidelines Section 15384, "argument, speculation, [or] unsubstantiated opinion or narrative" does not constitute substantial evidence. The comment does not provide substantial evidence that the City has failed to adequately address impacts to wildlife from the project and only implies that this has occurred. The IS/MND determined that the project would not result in significant impacts to wildlife with the incorporation of mitigation measures and no evidence to contradict this determination has been provided.

4. IS/MND fails to address cumulative impacts of past, ongoing, and future projects on wildlife

As described above, the project's impacts to wildlife would be limited and mitigated through the incorporation of standard conditions and mitigation measures. The proposed community park would largely remain as open space and be subject to the requirements of the existing conservation easements on the project site. The project, therefore, would not result in a cumulatively considerable contribution to any wildlife impact from past, ongoing, and future projects. The comment does not provide substantial evidence that the City has failed to adequately address cumulative impacts to wildlife from the project.

5. IS/MND mitigation measures are insufficient to address potential impacts

The preconstruction surveys described in the IS/MND are typical measures used for the subject species throughout Sonoma County and California, for similar projects. There is no

assertion or requirement in CEQA that impact minimization measures result in no impact to wildlife, rather CEQA requires that potential impacts to wildlife are reduced to a less than significant level. The comment relies on speculation based on the unsubstantiated narrative that the project will have a significant cumulative impact on wildlife. However, the comment does not provide evidence that determination described in the IS/MND is inaccurate and presents no information that would substantiate that a significant cumulative impact on wildlife would result from the project. The IS/MND determined that the project would not result in significant impacts to individual wildlife species and did not determine that cumulative effects would result from the project. No evidence to contradict this determination is provided in the comment.

Conclusion

In summary, the commentor has not provided substantial evidence that the IS/MND fails to adequately assess the project's impacts. The existing IS/MND is adequate to address the environmental impacts of the projects as required under CEQA. The City, therefore, is not required to prepare and circulate an EIR for the project and substantial evidence to the contrary has not been provided.

From: [Rawson, Alisa](#)
To: [Manis, Dina](#)
Subject: FW: [EXTERNAL] Proposed plan for Roseland community park
Date: Monday, September 27, 2021 8:20:31 AM

Here is public comment for 21-0831 for tomorrow CC meeting.

Thank you,

Alisa Rawson | Administrative Technician

Santa Rosa Parks Department | 55 Stony Point Ave | Santa Rosa, CA 95401

Tel. (707) 543-3293



From: Halla <hallahammoudeh@gmail.com>
Sent: Saturday, September 25, 2021 1:58 PM
To: Rawson, Alisa <ARawson@srcity.org>
Subject: [EXTERNAL] Proposed plan for Roseland community park

Hello there, my name is Halla and I live in the Roseland community. Im so excited there is a plan for a park! I always complain to my partner we have to drive or ride bikes on busy streets to access the closest park. We live on Rose ave so this will be very close to us. I'm unable to attend the council meeting but would like to propose the possibility of including tennis courts. It seems like tennis courts are only in what seem to be affluent communities. It would be such a nice way for people to exercise and get out and play. Even if people don't play yet if there is a court I bet people would try it! I really hope we get a tennis court it would really make the park complete!! Thank you so much for your time.

Sincerely,
Halla Hammoudeh

September 27, 2021

To: Chris Rogers (crogers@srcity.org) – Mayor
Eddie Alvarez (ealvarez@srcity.org) – District 1
Alisa Rawson (arawson@srcity.org)

RE: Roseland Creek Park Master Plan

As 17-year homeowner residents of Roseland, we are writing to you to express our concerns regarding the Master Plan proposed for the Roseland Creek Park. The Master Plan is continuing to promote more hardscape than the park actually needs. We need to keep what we have now in the proposed Roseland Creek Park. It is being currently being used for educational purposes by Roseland University Prep and Sheppard Accelerated Elementary for nature studies, and soon Roseland Elementary will be using the park. It is critical that Roseland Creek Park be maintained only as a nature park, as local residents have advocated for many, many years. The parking lot in the southern portion of the park will remove natural areas along Roseland Creek and take up areas where native plants could move into. The park should be designed for pedestrian and bicycle access and not for vehicular parking. There will be sufficient parking available on the north side of the creek that will be associated with the nature center.

The proposed community garden in the central eastern portion of the site is inappropriate, will remove available park land, and traffic and use inconsistent with the natural park setting, and a community garden already exists at Bayer Farm about ½ mile away.

Roseland Creek currently contains several hundred feet of concrete in the creek that needs to be removed. After removal, restoration needs to occur for bank stabilization and flood control. With climate change, not only will more droughts occur, but also torrential rains that could cause severe flooding along Roseland Creek. After removal of the concrete, the City should create a suitable flood zone and associated terrace in the eastern portion of the park. A restored Roseland Creek with a flood plain and associated terraces will allow the creek to move more freely and absorb the water from the urbanized areas to the east.

We agree that communities need conventional recreational parks. However, this unique bit of urban wilderness should be saved and enhanced and recreational parks should be placed further south in Roseland.

We are asking that you, City Council Members and Mayor, develop Roseland Creek Park as an alternative to the traditional-use parks in the area – one that is strong on education and restoration and connecting people in Roseland to nature. This will allow for one of the only parks in the southwest quadrant that provides recreational and educational opportunities that are nature based rather than relying on structured recreation (i.e., sports courts and open turf areas). The neighbors have been inspired to support and promote this type of park for many years, and we strongly support you who have the vision to do the same. *This will not be the last opportunity for development of a park in Roseland, but it is one of the last areas for saving a bit of unique nature in our urban area.*

Thank you for considering our comments.

Trish and Greg Tatarian
Burbank Avenue Residents

RECEIVED

SEP 27 2021

CITY OF SANTA ROSA
CITY CLERK'S OFFICE

walked in
by Diane De Witt
at 12:15 pm



PETITION FOR ALL NATURE IN "THE NEIGHBORHOOD"

WE THE UNDERSIGNED SUPPORT THE FORMATION OF THE ROSELAND CREEK PARK AS A SPECIAL PURPOSE PARK WHICH IS CENTERED ON "ENVIRONMENTAL INTERPRETIVE EXPERIENCES" (PSF-A-3), WHERE "...THE MOST SENSITIVE ENVIRONMENTAL RESOURCE AREAS SHOULD GENERALLY BE PRESERVED FOR MORE PASSIVE RECREATION THAT ASSURES THEIR PROTECTION" (PSF-A-5) AS SET FORTH IN THE SANTA ROSA GENERAL PLAN 2035.

WE SUPPORT THE APPROVAL OF THE "COMMUNITY IDEAL PLAN 2019" WHICH THE SURROUNDING RESIDENTIAL COMMUNITY HAS GENERATED, INSTEAD OF THE CITY PARKS DEPT. DRAFT MASTER PLAN 2018, WHICH CONTAINS ELEMENTS OF ACTIVE RECREATION AND OTHER FEATURES WHICH THREATEN, RATHER THAN PRESERVE THIS SENSITIVE ENVIRONMENTAL RESOURCE AREA FOR ENVIRONMENTAL EXPERIENCE AND EDUCATIONAL ENDEAVORS.

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PETITION FOR ALL NATURE IN "THE NEIGHBORHOOD"

WE THE UNDERSIGNED SUPPORT THE FORMATION OF THE ROSELAND CREEK PARK AS A SPECIAL PURPOSE PARK WHICH IS CENTERED ON "ENVIRONMENTAL INTERPRETIVE EXPERIENCES" (PSF-A-3), WHERE "...THE MOST SENSITIVE ENVIRONMENTAL RESOURCE AREAS SHOULD GENERALLY BE PRESERVED FOR MORE PASSIVE RECREATION THAT ASSURES THEIR PROTECTION" (PSF-A-5) AS SET FORTH IN THE SANTA ROSA GENERAL PLAN 2035.

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PETITION FOR ALL NATURE IN "THE NEIGHBORWOOD"

WE THE UNDERSIGNED SUPPORT THE FORMATION OF THE ROSELAND CREEK PARK AS A SPECIAL PURPOSE PARK WHICH IS CENTERED ON "ENVIRONMENTAL INTERPRETIVE EXPERIENCES" (PSF-A-3), WHERE "...THE MOST SENSITIVE ENVIRONMENTAL RESOURCE AREAS SHOULD GENERALLY BE PRESERVED FOR MORE PASSIVE RECREATION THAT ASSURES THEIR PROTECTION" (PSF-A-5) AS SET FORTH IN THE SANTA ROSA GENERAL PLAN 2035.

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PETITION FOR ALL NATURE IN "THE NEIGHBORWOOD"

WE THE UNDERSIGNED SUPPORT THE FORMATION OF THE ROSELAND CREEK PARK AS A SPECIAL PURPOSE PARK WHICH IS CENTERED ON "ENVIRONMENTAL INTERPRETIVE EXPERIENCES" (PSF-A-3), WHERE "...THE MOST SENSITIVE ENVIRONMENTAL RESOURCE AREAS SHOULD GENERALLY BE PRESERVED FOR MORE PASSIVE RECREATION THAT ASSURES THEIR PROTECTION" (PSF-A-5) AS SET FORTH IN THE SANTA ROSA GENERAL PLAN 2035.

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PO Box 506 • Forestville CA 95436 • 707.664.7060

Santa Rosa City Council,

Several meetings have transpired since my letter (below) sent January 24th this year. It is clear that significant costs can be saved by going with a Nature Park verses a developed park that duplicate other parks with southwest Santa Rosa. A template has been set for Sonoma County Open Space District by creating low development open space “parks”. These areas are cost effective and well used by the community. This template should be adopted by Santa Rosa where appropriate. The Roseland Creek park is appropriate and needed for this area. Areas that are under developed can always be developed more at a later date but the opposite is not done or rarely done where nature is recreated. Please underdevelop and protect the natural areas, the wildlife, and the tranquility.

Thank you.

Larry Hanson, Board President
Forest Unlimited
www.forestunlimited.org
larryjhanson@comcast.net

Forest Unlimited has supported and participated in efforts with the Roseland community to take care of and sustain natural areas near Roseland Creek. We have planted trees, helped to build trails, and cleaned up debris and garbage to make these areas as pristine as possible. We have also attended most of the outreach meetings held by the city to give input on the design.

Support for Natural Areas Design

We have observed that the participation from the community has been remarkable. I hope the staff has accurately reported that there is an over-whelming support for a nature or natural park with less development of structures, parking lots, sports fields, etc. This is an amazing opportunity for Santa Rosa to save thousands of dollars in construction and design to support what the community wants. We hope you make this smart choice in your final design and plan.

Climate Change Resiliency

Forest Unlimited has been promoting more trees and natural areas in the county for over two decades. The resiliency of natural areas can buffer the effects of climate change and should be considered with high priority.

Environmental Education Opportunity

There is another important factor from a personal standpoint. I taught school for over thirty years at Sheppard Elementary School in the Roseland District. Environmental Education was an important part of the curriculum and still is. Then, I would bus children miles away to Annabel Park in east Santa Rosa, the Bouverie Preserve in Glen Ellen, and Fairfield Osborn Preserve on Sonoma Mountain. Now, here in Roseland, is an opportunity for schools, classrooms and children to study, learn and enjoy nature in a natural setting.

Forest Unlimited and myself, personally, along with the Roseland community urge the city council to wholeheartedly support minimal development and the natural concept, a nature park, in the design of the plan.

Thank you

Larry Hanson, Board President

Forest Unlimited

www.forestunlimited.org

contact@forestunlimited.org