

EXHIBIT A



Marlow Road Development

2199 Marlow Road, Santa Rosa, CA (Sonoma County)

Assessor's Parcel Nos. 036-061-028, 036-061-068, 036-061-069 & 036-061-064

Initial Study/Negative Declaration

Lead Agency:

City of Santa Rosa
Community Development Department
100 Santa Rosa Avenue, Rm. 3
Santa Rosa, CA 95404

Contact: Susie Murray, City Planner

Date: January 5, 2016



DATE: January 5, 2015
TO: Public Agencies, Organizations and Interested Parties
FROM: Susie Murray, City Planner
SUBJECT: NOTICE OF PUBLIC REVIEW AND INTENT TO ADOPT A NEGATIVE DECLARATION

Pursuant to the State of California Public Resources Code and the “Guidelines for Implementation of the California Environmental Quality Act of 1970” as amended to date, this is to advise you that the Community Development Department of the City of Santa Rosa has prepared an Initial Study on the following project:

Project Name:
Marlow Road Development

Location:
2045 Guerneville Road and 2199 Marlow Road, Santa Rosa, Sonoma County, California, APN: 036-061-028, 036-061-068, 036-061-069 & 036-061-064. NOTE: Parcels 036-061-028 and 036-061-068 have no street addresses associated with the Assessor’s Parcel Number.

Property Description:

Existing Development

APN: 036-061-064: one single-family residence and garage; one modular home
APN: 036-061-068: one single-family residence and garage
APN: 036-061-069: one single-family residence with attached garage and barn
APN: 036-061-028: vacant

Surrounding Land Uses and Setting

The subject property is the aggregation of four semi-rural parcels within a neighborhood of residential, commercial, and public/institutional uses. Semi-rural residential parcels, ranging in size from ±3.38 acres to ±1.69 acres, adjoin the property to the west. The parcels fronting the Marlow Road/Guerneville Road intersection, which lies ±240 ft. west and ±300 ft. south of the project site, are developed with retail/business service uses; three of which are developed with gasoline service stations, the fourth is a regional shopping center. Single-family residential uses exist further to the west, east and north; the public/institutional uses of Monroe School, Northwest Community Park and Hilliard Comstock Middle School exist to the north.

Project Description:

Location and Site Characteristics

The ±5.1-acre project site, which consists of four separate, legal parcels (APN: 036-061-069, -068, -064 and -028), is located northwest of the intersection of Guerneville Road and Marlow Road. The terrain is essentially flat, having a gentle east-west slope of less than 1%. The US Department of Agriculture Soil Survey for Sonoma County, May 1972, identifies the soil as Wright Loam 0 to 9%. Site vegetation consists primarily of

non-native annual grasses, and scattered trees. A tree inventory conducted for the site indicates that the majority of the trees are coast live oak, valley oak and walnut¹.

The project site lies west of an existing storm drain system, which drains in a westerly direction until it outfalls to Piner Creek. The proposed project can be served by this storm drain system, which was constructed as part of the Stonewood Subdivision Unit No. 1 (City File No. 86-94) and later expanded by a City of Santa Rosa Capitol Improvement Project (City File No. 94-088)².

The site is accessed by both Marlow Road and Guerneville Road, each considered major arterials in the city of Santa Rosa General Plan and each having Class II bikeways.

General Plan and Zoning

Table 1: Existing General Plan Land Use Designation and Zoning

APN	Site Size	General Plan	Zoning
036-061-064	±1.92 acres	Medium Density Residential: 8-18 u/ac.	RR-40
036-061-068	±1.97 acres	Low Density Residential: 4-8 u/ac.	R-1-6
036-061-069	±0.40 acres	Low Density Residential: 4-8 u/ac.	R-1-6
036-061-028	±0.81 acres	Low Density Residential: 4-8 u/ac.	R-1-6

Table 2: Proposed General Plan Land Use Designation and Zoning

APN	Site Size	General Plan	Zoning
036-061-064	±1.92 acres	Medium Density Residential: 8-18 u/ac.	R-3-18
036-061-068	±1.97 acres	Medium Density Residential: 8-18 u/ac.	R-3-18
036-061-069	±0.40 acres	Medium Density Residential: 8-18 u/ac.	R-3-18
036-061-028	±0.81 acres	Medium Density Residential: 8-18 u/ac.	R-3-18

As depicted in Tables 1 and 2 above, the project seeks to amend the General Plan land use designation on ±3.18 acres of the ±5.1-acre area to Medium Density Residential (8 to 18 units per acre) and rezone the entire area to the R-3-18 zoning district.

The site is currently developed with three single-family residential units and one mobile home. By amending the land use designation to Medium Density Residential for the entire project area, a maximum of 91 units, or an increase of 87 units, becomes possible.

There is no development proposal at this time.

¹ Tree Inventory 2199 Marlow Road, Horticultural Associates, October 2015

² Storm Drain Analysis Marlow Road Development Civil Design Consultants, Inc. July 2015.

Environment Issues:

The proposed project would not result in any significant impacts. The Initial Study/Negative Declaration document has been prepared in consultation with local, and state responsible and trustee agencies and in accordance with Section 15063 of the California Environmental Quality Act (CEQA).

A 20-day public review period shall commence on January 6, 2016. Written comments must be sent to the City of Santa Rosa, Planning & Economic Development Department, Planning Division, 100 Santa Rosa Avenue, Room 3, Santa Rosa CA 95404 by January 27, 2016. The City of Santa Rosa Planning Commission will hold a public hearing on the Initial Study/Negative Declaration and project merits on Thursday, January 18, 2016 in the Santa Rosa City Council Chambers at City Hall (address listed above). Correspondence and comments can be delivered to Susie Murray, project planner, phone: (707) 543-4348, email: smurray@srcity.org.

Project Site



CHECKLIST

- **Project Title:** Marlow Road Development

- **Lead Agency Name & Address:** City of Santa Rosa
Community Development Department
Planning Division
100 Santa Rosa Avenue
Santa Rosa, California 95404

- **Contact Person & Phone Number:** Susie Murray, City Planner
Phone number: (707) 543-4348
Email: smurray@srcity.org

- **Project Location:** The site is located in the City of Santa Rosa, Sonoma County, California at 2045 Guerneville Road and 2199 Marlow Road, Assessor's Parcel Nos. : 036-061-028, 036-061-068, 036-061-069 & 036-061-064. NOTE: Parcels 036-061-028 and 036-061-068 have not street addresses associated with the Assessor's Parcel Number.

- **Project Sponsor's Name & Address:** Greg Hall and Jili Jiang
4 Commodore Drive, Suite 442
Emeryville, CA 95608

- **Project Sponsor's Representative** Jean Kapolchok
843 2nd Street
Santa Rosa, CA 95404

- **General Plan Designation:** APN 036-061-064 is Medium Density Residential
APNs 036-061-028, -068 and -069 are Low Density Residential

- **Zoning:** APN 036-061-064 is RR-40 (Rural Residential)
APNs 036-061-028, -068 and -069 are R-1-6 (Single-Family Residential)

8. Description of Project:

Project Description:

Location and Site Characteristics

The ±5.1-acre project site, which consists of four separate, legal parcels (APN: 036-061-069, -068, -064 and -028), is located northwest of the intersection of Guerneville Road and Marlow Road. The terrain is essentially flat, having a gentle east-west slope of less than 1%. The US Department of Agriculture Soil Survey for Sonoma County, May 1972, identifies the soil as Wright Loam 0 to 9%. Site vegetation consists primarily of non-native annual grasses, and scattered trees. A tree inventory conducted for the site indicates that the majority of the trees are coast live oak, valley oak and walnut³.

³ Tree Inventory 2199 Marlow Road, Horticultural Associates, October 2015

The project site lies west of an existing storm drain system, which drains in a westerly direction until it outfalls to Piner Creek. The proposed project can be served by this storm drain system, which was constructed as part of the Stonewood Subdivision Unit No. 1 (City File No. 86-94) and later expanded by a City of Santa Rosa Capitol Improvement Project (City File No. 94-088)⁴.

The site is accessed by both Marlow Road and Guerneville Road, each considered major arterials in the city of Santa Rosa General Plan and each having Class II bikeways.

General Plan and Zoning

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As depicted in Tables 1 and 2 above, the project seeks to amend the General Plan land use designation on ±3.18 acres of the ±5.1-acre area to Medium Density Residential (8 to 18 units per acre) and rezone the entire area to the R-3-18 zoning district.

The site is currently developed with three single-family residential units and one mobile home. By amending the land use designation to Medium Density Residential for the entire project area, a maximum of 91 units, or an increase of 87 units, becomes possible.

There is no development proposal at this time.

10. Other Public Agencies Whose Approval Is Required: (e.g., permits, financing approval, or participation agreement.)

Approval of the General Plan amendment and Rezoning would not require the approval of another agency. Development of the subject sites would also not require the approval of another agency.

⁴ Storm Drain Analysis Marlow Road Development Civil Design Consultants, Inc. July 2015.

11. Exhibits:

1. Vicinity Map
2. Trip Generation Analysis prepared by W-Trans, dated October 26, 2015
3. Biological Resource Assessment prepared by Ted P. Winfield, Ph.D, dated August 31, 2015
4. Storm Drain Analysis prepared by Civil Design Consultants, dated July 16, 2015
5. Tree Inventory prepared by Horticultural Associates, dated October 28, 2015
6. Cultural Resources Survey prepared by Tom Origer & Associates, dated August 27, 2015

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology /Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality |
| <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation / Traffic | <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Mandatory Findings Of Significance |

DETERMINATION

On the basis of this initial evaluation:

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

Signature

Date

SUSIE MURRAY, City Planner

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
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II. AESTHETICS

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Substantially degrade the existing visual character or quality of the site and its surroundings? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion

I. (a) **No Impact.** The project site is not located within a scenic highway or on a street that is designated as a Scenic Road in the Santa Rosa General Plan 2035.

I. (b-d) **Less than Significant Impact.** Future development as a result of the proposed General Plan Amendment and Rezoning would not damage scenic resources, involving rock outcroppings or historic buildings. It may, however, result in the removal of trees, in which case the development would be required to comply with the City’s Tree Ordinance, City Code Chapter 17-24, including what is to be determined at that time as appropriate mitigation.

At maximum build out, there could be as many as 91 attached dwelling units, with a maximum height of 45 feet, per the R-3-18 zoning district development standards. Future development will be subject to Municipal Code development and design standards, which are designed to lessen the potential degradation of the existing visual character or quality of the site and its surroundings. The project area is relatively flat. It is surrounded by parcels developed with residential uses to the west, north, and east, with maximum building heights of 35 feet and to the south by lots with a mix of single family residential and commercial uses, and maximum building heights of 35 feet and 45 feet respectively.

Recommended Mitigation Measures: No mitigation required.

Sources:

City of Santa Rosa Code Zoning Code, 2006

City of Santa Rosa General Plan, 2035

Potentially Significant Impact

Less-Than-Significant With Mitigation Incorporation

Less-Than-Significant Impact

No Impact

III. AGRICULTURE AND FOREST RESOURCES

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

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

II. (a, c, d, e) **No Impact.** There are no important federal or state farmlands identified within the City limits of Santa Rosa. The project site is located within Santa Rosa’s Urban Growth Boundary and is not currently used for agricultural uses. Adjacent properties are similarly designated for residential and commercial development, and there are no existing agricultural uses in the immediate area. Therefore, the proposed project is expected to have no impact on conversion of farmland or existing agricultural uses.

II. (B) **Less than Significant Impact.** The project sites are not currently under a Williamson Act contract so the proposed project would not conflict with existing Williamson act contract for the property.

The sites are currently zoned R-1-6 (Single-Family Residential) and RR-40 (Rural Residential), both of which allow crop production and initial crop processing. If the project is approved, no agricultural uses would be permitted on the properties.

Recommended Mitigation Measures: No mitigation required.

Sources:

- City of Santa Rosa Geographic Information Systems
- County Assessor’s Property Record (for Williamson Act Contract)
- City of Santa Rosa General Plan, 2035
- City of Santa Rosa Code Zoning Code, 2006

Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
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IV. AIR QUALITY

Would the project: *(Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.)*

a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a cumulatively considerable net increase any criteria pollutant for which the project region is non – attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
d. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Setting:

The City of Santa Rosa is located within the San Francisco Bay Area Air Basin (SFBAAB) and therefore subject to the ambient air quality standards (AAQS) established by the Bay Area Air Quality Management District (BAAQMD), and those adopted by the California Resources Board (CARB), and the U.S Environmental Protection Agency. Air quality within the Bay Area Air Basin is due to natural, geographical, and meteorological conditions as well as human activities including construction and development, operation of vehicles, and industry and manufacturing.

The BAAQMD is responsible for planning, implementing, and enforcing air quality standards within the Bay Area Air Basin, including the City of Santa Rosa. The BAAQMD operates a monitoring station in downtown Santa Rosa at 5th Street, where it records pollutant concentration levels for carbon monoxide (CO), Nitrogen Dioxide (NO2), Ozone (O3), and Particulate Matter (PM2.5). The BAAQMD Compliance and Enforcement Division routinely conducts inspections and audits of potential polluting sites to ensure compliance with applicable federal, State, and BAAQMD regulations.

The Bay Area Air Basin is designated as non-attainment for the following state air quality standards: the 1-hour and 8-hour state ozone standards of 0.09 parts per million (ppm) and 0.070 ppm respectively, and the national 8-hour ozone standard of 0.075 ppm. The Basin is also in non-attainment for the PM10 and PM2.5 state standards. In addition, the Bay Area Air Basin is designated as non-attainment for the national 24-hour PM2.5 standard. All other national ambient air quality standards within the Bay Area Air Basin are in attainment.

The BAAQMD maintains thresholds of significance for criteria pollutants, but has been required by California courts to suspend the most recently adopted 2010 significance thresholds due to pending legal action against the BAAQMD. During legal proceedings the BAAQMD recommends using the previously adopted significance thresholds of 80 pounds per day and 15 tons per year of ROG, NOx and PM10 for operational project emissions.

Discussion:

A Trip Generation Analysis was prepared by Whitlock & Weinberger Transportation, Inc. (W-Trans), dated October 26, 2015. The analysis compares the potential change in trip generation associated with the proposed General Plan Amendment and Rezoning to both the existing conditions and the potential development under the current General Plan land use designation and zoning. Maximum build out could result in 91 attached residential units. When compared to existing conditions, we could expect an additional 567 vehicle trips per day.

At which point the General Plan land use has been changed to Medium Density Residential and the zoning changed to the R-3-18 zoning district, all development projects will require Design Review, hence trigger subsequent environmental review. A project of this size may require mitigation measures which will be determined based on development specific details.

III. a) No Impact: The BAAQMD adopted the Bay Area 2010 Clean Air Plan (CAP) in September 2010 to comply with state air quality planning requirements set forth in the California Health & Safety Code. The 2010 CAP serves

to update the 2005 Ozone Strategy and provides control strategies to address air quality pollutants including ozone (O₃), Particulate Matter (PM), toxic air contaminants (TACs), and greenhouse gases (GHGs). A total of 55 control strategies have been developed as part of the CAP for land use, energy and climate, stationary sources, transportation, and mobile sources. Control strategies are designed to reduce emissions of ozone precursors, PM, air toxics, and greenhouse gases, work towards attainment of state ozone standards, reduce transport of ozone to neighboring basins, and to protect public health and the climate. Measures to implement control strategies include the use of clean and efficient vehicles, Green Construction Fleets, enhanced bicycle and pedestrian access, energy efficiency, and others.

The BAAQMD CEQA Guidelines set forth criteria for determining consistency with the CAP. In general a project is considered consistent if a) the project supports the primary goals of the CAP, b) includes control measures and c) does not interfere with implementation of the CAP measures. Neither the proposed change in land use and zoning nor the potential build-out of the site for the addition of attached housing is expected to result in any conflicts in implementing the CAP. Therefore, the project would have no impacts due to a conflict with the regional air quality plan.

III. (b-c) Less than significant impact. The proposed project would generate criteria pollutants from both short-term and long-term activities.

As a result of the change in the General Plan land use and zoning, future development of this site would result in short term air quality impacts due to the use of construction equipment such as trucks and bulldozers. This type of equipment can generate temporary emissions of ozone precursors (i.e., nitrogen oxides and volatile organic compounds). Project-related construction activities would generate dust and exhaust emissions, primarily from on-site earthmoving activities. Using default values, the California Emissions Estimator Model (CalEEMod) calculated short-term construction to be 82.3 lb/day of NO_x, 371.2 lb/day of ROG, and 23.7 lb/day of PM₁₀. Due to the limited duration of grading and construction activities on the project site, construction-related emissions of criteria pollutants would not be significant on a project-specific or cumulative basis. However, when proposed, physical development of the site will be required to implement standard measures identified by the BAAQMD that would reduce construction related ozone precursors and fugitive dust.

In terms of long term operational impacts, which are typically a result of criteria pollutants from both mobile emissions sources (such as vehicle trips) and area sources (such as consumer products or natural gas usage), the project's operational emissions were calculated using CalEEMod. The criteria pollutant emission for the project were calculated to be 5.0 lb/day of NO_x, 40 lb/day of ROG, and 8.6 lb/day of PM₁₀. Criteria pollutant impacts of the project will be less than significant as projected emissions are below the BAAQMD thresholds of significance.

III. (d) Less than significant impact: The proposed change in land use would likely result in the development of 91 attached residential units. Assuming all or a portion of those units are constructed, the project would require site preparation, minor grading, and construction including infrastructure and landscaping, which would result in the short term emission of air quality pollutant. However, due to the scope and scale of the project, air quality emissions are expected to be minimal. Assuming maximum build out, once constructed, the addition of attached units would not generate air quality emissions or introduce new sensitive receptors onsite. Therefore, air quality impacts to sensitive receptors from the proposed project would be less than significant.

III. (e) Less than significant impact: Residential uses typically do not generate odor emissions in any substantial quantity. It is possible that there could be some objectionable odors from use of diesel equipment during the construction of the project; however, given the temporary and short-term duration of construction, impacts would be less than significant and no mitigation measures are required.

Recommended Mitigation Measures: No mitigation required.

Sources:

City of Santa Rosa General Plan, 2035

W-Trans Trip Generation Analysis, dated October 26, 2015

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
V. BIOLOGICAL RESOURCES				
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

IV. (a & d-e) **Less than Significant Impact.** There are no ground disturbing activities proposed as part of this project. In anticipation of future development, however, a Biological Resource Assessment was prepared by Ted P. Winfield, Ph.D., dated August 31, 2015, and concluded the following:

- Special-status plant species are not expected to occur at the site.
- Wetland habitat is not present at the site.
- The California Tiger Salamander is unlikely to occur at the site.
- Future development of the site could have a substantial direct and/or indirect effect on special-status or otherwise protected migratory song birds and raptors. This impact would be less than significant with mitigation.
- Future development of the site could have a substantial direct and/or indirect effect on special-status bats. This impact would be less than significant with mitigation.

In anticipation of future development, an arborist’s assessment, prepared by Horticultural Associates, dated October 28, 2015, was prepared. The site contains both native and non-native trees, of which some are considered heritage trees as defined by the City’s Tree Ordinance, City Code Chapter 17-24, and others are exempt. Any future development proposals would be required to comply the aforementioned tree ordinance.

IV (b-c & f) **No Impact.** This project involves a General Plan Amendment and Rezoning. Impacts to biological resources are not anticipated. Further, Figure 7-2 in the Santa Rosa General Plan does not identify the project area as being a known location for sensitive species, or the potential for high quality vernal pool habitat. No waterways are located on or adjacent to the project site. Future development of the site would be subject to the City’s General Plan, Citywide Master Creek Plan, and Zoning Code.

Recommended Mitigation Measures: No mitigation required.

Sources:

City of Santa Rosa Geographic Informational Systems
 City of Santa Rosa General Plan, 2035

	Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporation	Less-Than- Significant Impact	No Impact
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VI. CULTURAL RESOURCES

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporation	Less-Than- Significant Impact	No Impact
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V. (a-d) **No Impact.** Since there are no construction activities proposed as part of this project, no impacts to cultural resources are anticipated. In terms of archaeological, or paleontological resources, no known prehistoric or archaeological resources have been identified on this site. A Cultural Resource Study, produced by Tom Origer and Associates, dated August 27, 2015, concluded that there are no resources with the potential to meet California Register of Historical Resources Criteria were found.

The project site is immediately surrounded by a mix of lower density residential and commercial uses, and in the vicinity of medium density residential, James Monroe Elementary School, Hilliard Comstock Middle School and Northwest Community Park.

The project application was received prior to July 1, 2015, and as such is not required to adhere to the formal consultation process required under AB 52. The application materials were referred to the Native American Heritage Commission on June 19, 2015, as directed, and subsequent letters sent to local tribes. No further comments were received.

At which point the General Plan land use has been changed to Medium Density Residential and the zoning changed to the R-3-18 zoning district, all development projects will require Design Review, hence trigger subsequent environmental review. A project of this size may require mitigation measures which will be determined based on development specific details.

If, during future development, archaeological resources were uncovered, a standard measure that all work in the area of the find would cease, and a qualified archaeologist and representatives of the culturally affiliated tribe would be retained by the project sponsor to investigate the find and make recommendations as to treatment and handling of those resources. Prehistoric archaeological site indicators include: obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire affected stones. Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps). Should excavation for basements or any other form of deep trenching, as identified by City staff, be included in the development project, a credentialed archaeological monitor shall be retained by the project sponsor to be present during initial excavation.

Per General Plan Policy HP-A-5, if human remains are encountered, future development of the site would be required to comply with the California Health and Safety Code Section 7050.5, which states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Sonoma County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within a reasonable timeframe. Subsequently, the Native American Heritage Commission shall identify the “most likely descendant.” The most likely descendant shall then make recommendations, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98. Compliance with the aforementioned regulations would ensure that the potential disturbance of unknown archeological resources would result in a less than significant impact.

Sources:

Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporation	Less-Than- Significant Impact	No Impact
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VII. GEOLOGY AND SOILS

Would the project:

- a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 - ii) Strong seismic ground shaking?
 - iii) Seismic related ground failure, including liquefaction?
 - iv) Landslides?
- b. Result in substantial soil erosion or the loss of topsoil?
- c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on, or off, site landslide, lateral spreading, subsidence, liquefaction or collapse?
- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporation	Less-Than- Significant Impact	No Impact
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where sewers are not available for the disposal of wastewater?

Discussion:

VI (a) **Less than Significant Impact.** The City of Santa Rosa is subject to geological hazards related primarily to seismic events (earthshaking) due to presence of active faults. The subject site is located in an area prone to very strong ground shaking as depicted on the City of Santa Rosa Geographic Information Systems. Future development would be subject to the California Building Code including compliance with seismic requirements.

VI. (b-e) **No Impact:** The site is of relatively flat terrain. Impacts related to landslides, geology or soils are not anticipated. Application of City standards and Title 24/California Code of Regulations in effect at the time of a development application will address any potential impacts related to soil erosion, loss of top soil or geologic make-up.

The City’s sewer system is available at the subject site. Future development would include connection to City sewer systems for wastewater disposal.

Recommended Mitigation Measures: No mitigation required.

Sources:

- City of Santa Rosa General Plan 2035
- City of Santa Rosa Geographic Information Systems

Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporation	Less-Than- Significant Impact	No Impact
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VIII. GREENHOUSE GAS EMISSIONS

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Generate Greenhouse Gas Emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Setting:

According to the US Environmental Protection Agency, climate change refers to any significant change in measures of climate, such as average temperature, precipitation, or wind patterns over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have

recently been associated with global warming, an average increase in the temperature of the atmosphere near the Earth's surface, attributed to accumulation of Greenhouse Gas (GHG) emissions in the atmosphere. Greenhouse gases trap heat in the atmosphere, which in turn heats the surface of the Earth. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The emission of GHGs through the combustion of fossil fuels (i.e., fuels containing carbon) in conjunction with other human activities, appears to be closely associated with global warming. State law defines GHG to include the following: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride (Health and Safety Code, section 38505(g).) The most common GHG that results from human activity is carbon dioxide, followed by methane and nitrous oxide.

Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006, recognizes that California is the source of substantial amounts of GHG emissions. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snow pack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems. In order to avert these consequences, AB 32 establishes a state goal of reducing GHG emissions to 1990 levels by the year 2020 (a reduction of approximately 25 percent from forecast emission levels) with further reductions to follow.

The City of Santa Rosa has also adopted local regulation to address GHG emissions. On June 5, 2012, the City of Santa Rosa adopted a Climate Action Plan, which meets the programmatic threshold for a Qualified GHG Reduction Strategy, established by the Bay Area Air Quality Management District (BAAQMD) guidelines.

The BAAQMD adopted revised CEQA Guidelines in 2010, which included thresholds of significance for greenhouse gas emissions, but has been compelled by California courts to suspend them due to pending legal action against the BAAQMD. Based on prior BAAQMD guidance, a project is considered to have a less-than-significant impact due to GHG emissions if it:

1. Complies with an adopted Qualified GHG Reduction Strategy;
2. Emits less than 1,100 metric tons (MT) CO₂e per year; or
3. Emits less than 4.6 MT CO₂e per service population per year (residents and employees).

The Santa Rosa Climate Action Plan (CAP) is considered a Qualified GHG Reduction Strategy because it contains a baseline inventory of greenhouse gas emissions from all sources, sets forth greenhouse gas emission reduction targets that are consistent with the goals of AB 32, and identifies enforceable GHG emission reduction strategies and performance measures. Accordingly, future development would be analyzed for consistency with the CAP in order to assess level of significance for GHG emissions.

Discussion

VII. (a-b). Less than significant impact: According to the US Environmental Protection Agency, climate change refers to any significant change in measures of climate, such as average temperature, precipitation, or wind patterns over a period of time. Climate change may result from natural factors, natural processes, and human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have recently been associated with global warming, an average increase in the temperature of the atmosphere near the Earth's surface, attributed to accumulation of Greenhouse Gas (GHG) emissions in the atmosphere. Greenhouse gases trap heat in the atmosphere, which in turn heats the surface of the Earth. Some GHGs occur naturally and are emitted to the atmosphere through natural processes, while others are created and emitted solely through human activities. The emission of GHGs through the combustion of fossil fuels (i.e., fuels containing carbon) in conjunction with other human activities, appears to be closely associated with global warming. State law defines GHG to include the following: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride (Health and Safety Code,

section 38505(g).) The most common GHG that results from human activity is carbon dioxide, followed by methane and nitrous oxide.

Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006, recognizes that California is the source of substantial amounts of GHG emissions. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems. In order to avert these consequences, AB 32 establishes a state goal of reducing GHG emissions to 1990 levels by the year 2020 (a reduction of approximately 25 percent from forecast emission levels) with further reductions to follow.

The City of Santa Rosa has also adopted local regulation to address GHG emissions. On December 4, 2001 the Santa Rosa City Council adopted a resolution to become a member of Cities for Climate Protection (CCP), a project of the International Council on Local Environmental Initiatives. On August 2, 2005, the Santa Rosa City Council adopted Council Resolution Number 26341, which established a municipal greenhouse gas reduction target of 20% from 2000 levels by 2010 and facilitates the community-wide greenhouse gas reduction target of 25% from 1990 levels by 2015. On June 5, 2012, the City of Santa Rosa adopted a Climate Action Plan (CAP), which meets the programmatic threshold for a Qualified GHG Reduction Strategy, established by the Bay Area Air Quality Management District (BAAQMD) guidelines. Any future development project would be encouraged to comply with the CAP New Development Checklist (Appendix E). The BAAQMD adopted revised CEQA Guidelines, which included thresholds of significance for greenhouse gas emissions. The Guidelines were subsequently updated in May 2011.

Based on the BAAQMD Guidelines, a project is considered to have a less-than-significant impact due to GHG emissions if it:

1. Complies with an adopted Qualified GHG Reduction Strategy;
2. Emits less than 1,100 metric tons (MT) CO₂e per year; or
3. Emits less than 4.6 MT CO₂e per service population per year (residents and employees).

The site is currently developed with three single-family structures and one mobile home. While there is no development proposal at this time, by amending the land use designation to Medium Density Residential for the entire project area, a maximum of 91 units becomes possible. A theoretical project consisting of 91 units could be developed on the approximately 5.10-acre site and would generate approximately 628 metric tons/year, (MT/yr.) of carbon dioxide equivalent, (CO₂e), (*calculated using the California Emissions Estimator Model*). Of that, approximately 556 MT/yr. of CO₂e can be attributed to vehicle exhaust. The proposed project has been reviewed in compliance with the BAAQMD's CEQA Guidelines.

The proposed project is consistent with all the applicable local plans, policies and regulations as stated in Section X. Land Use, Response b of this report, and would not conflict with the provisions of AB 32, the applicable air quality plan, or any other State or regional plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions.

Standard Measures:

The following standard measures are included as part of the project and would lessen the GHG emissions:

- The project site is located in an area served by public transit, and pedestrian and bicycle paths;
- The project site is close to employment centers and other existing services;

Sources:

CalEEMod, California Emissions Estimator Model

Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporation	Less-Than- Significant Impact	No Impact
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IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
adjacent to urbanized areas or where residences are intermixed with wildlands?				

Discussion:

VIII. (a-c and e-h) **No Impact.** The proposed General Plan Amendment, Rezoning, and future development that will likely happen as a result are not anticipated to involve the storage of hazardous materials. At the time of future development applications, the City of Santa Rosa Fire Department will receive notification and assess hazards and hazardous waste applicable to the use. The change in land use will not cause significant exposure to hazardous material. The site is not located within an airport land use plan or within two miles of a public airport, nor is it in the vicinity of a private airstrip. The site is not located in a heavily wooded area so would not be subject to a wildland fire.

The subject site is in an urbanized area and would continue to be served by a public street. As such, the proposal would not impair implementation or physically interfere with emergency response or evacuation plans. Future development resulting from the proposed land use change is not anticipated to create a risk of explosion, release of hazardous substances or other dangers to public health.

VIII (d) **Less than Significant Impact** - One of the subject parcels, 2045 Guerneville Road, APN 036-061-064, is adjacent to a Shell Station located at 2005 Guerneville Road, APN 036-061-065, which has been identified as a source of shallow groundwater contamination. While no contamination has been confirmed at 2045 Guerneville Road, any future development in the southern portion of that parcel will likely require a Groundwater Management Plan.

Recommended Mitigation Measures: No mitigation required.

Sources:

City of Santa Rosa General Plan, 2035
 Regional Water Quality Control Board, (Telephone Conversation with Jo Bentz, on December 17, 2015)

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
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X. HYDROLOGY AND WATER QUALITY

Would the project:

a. Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. 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 (e.g., the production rate of pre-existing nearby wells would drop to a level which would not	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
support existing land uses or planned uses for which permits have been granted)?				
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j. Inundation by seiche, tsunamis, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion:

IX. (d and f-j) **No Impact.** The project site is not located within the 100 year flood area or 500 year special flood hazard area as designated by maps provided by the Federal Emergency Management Agency (FEMA). The proposed General Plan Amendment, Rezoning and potential future development of multi-family residential

structures are not anticipated to expose people or buildings to a significant risk or loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, nor is the site expected to be impacted by inundation by seiche, tsunami or mudflow.

IX. (a-c and e) **Less than Significant Impact.** The future development of this site could result in as many as 91 attached residential units utilizing municipal water sources, which may include the use of ground water. Development of this site is not anticipated to result in significant impacts to the groundwater supply or groundwater recharge.

Storm water, or runoff generated from rain, that is not absorbed into the ground accumulates debris, chemicals and other polluting substances harmful to water quality. Polluted stormwater entering creeks is a concern because of its threat to public health and aquatic life that inhabit waterways. Additionally, rain runoff from developments may increase flow rates and durations that cause hydro-modification in creeks contributing to loss of habitat and decreased aquatic biological diversity. In areas with known groundwater pollution, infiltration of stormwater may need to be avoided as it could contribute to the movement or dispersion of groundwater contamination. Future development of this site would be subject to the Storm Water Low Impact Development Technical Design Manual and would be required to comply with the erosion control requirements stipulated in the National Pollutant Discharge Elimination System (NPDES) Permit issued to the San Francisco Bay Regional Water Quality Control Board. These requirements include the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which contains Best Management Practices (BMP) designed to control erosion from construction sites. The preparation and implementation of the SWPPP would ensure that potential adverse erosion, siltation, and contamination impacts would not occur during short-term construction activities.

A storm drain analysis was prepared by Civil Design Consultants, dated July 16, 2015. The site will drain to the Stonewood Subdivision storm drain system which was expanded by a City Capitol Improvement project, City File No. 94-088. The report concluded that the existing system is adequate to handle run-off generated by the construction of a theoretical 91-unit residential complex located at the subject site.

Recommended Mitigation Measures: No mitigation required.

Sources:

- City of Santa Rosa Geographic Information Systems
- City of Santa Rosa General Plan, 2035
- Storm Drain Analysis prepared by Civil Design Consultants, dated July 16, 2015

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
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XI. LAND USE AND PLANNING

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
adopted for the purpose of avoiding or mitigating an environmental effect?				
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

X. (a-c) No Impact. As depicted in Tables 1 and 2 below, the project seeks to amend the General Plan land use designation on ±3.18 acres of the ±5.1-acre area to Medium Density Residential (8 to 18 units per acre) and rezone the entire area to the R-3-18 zoning district.

The properties are bounded by land designated for residential uses to the west, north and east and to the south by a mix of residential and commercial uses. Future development of this land is not anticipated to divide an existing community nor will it conflict with any habitat conservation plan.

The site is currently developed with three single-family residential units and one mobile home. While there is no development proposal at this time, by amending the land use designation to Medium Density Residential for the entire project area, a maximum of 91 units, or an increase of 87 units, becomes possible.

Table 1: Existing General Plan Land Use Designation and Zoning

APN	Site Size	General Plan	Zoning
036-061-064	±1.92 acres	Medium Density Residential: 8-18 u/ac.	RR-40
036-061-068	±1.97 acres	Low Density Residential: 4-8 u/ac.	R-1-6
036-061-069	±0.40 acres	Low Density Residential: 4-8 u/ac.	R-1-6
036-061-028	±0.81 acres	Low Density Residential: 4-8 u/ac.	R-1-6

Table 2: Proposed General Plan Land Use Designation and Zoning

APN	Site Size	General Plan	Zoning
036-061-064	±1.92 acres	Medium Density Residential: 8-18 u/ac.	R-3-18
036-061-068	±1.97 acres	Medium Density Residential: 8-18 u/ac.	R-3-18
036-061-069	±0.40 acres	Medium Density Residential: 8-18 u/ac.	R-3-18
036-061-028	±0.81 acres	Medium Density Residential: 8-18 u/ac.	R-3-18

The Medium Density Residential General Plan land use designation allows a range of housing types, including single family attached and multifamily developments, and is intended for specific areas where higher density is appropriate. New single-family detached housing will not be permitted.

Recommended Mitigation Measures: No mitigation required.

Sources:

City of Santa Rosa General Plan, 2035
City of Santa Rosa Zoning Code, 2006

	Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporation	Less-Than- Significant Impact	No Impact
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XII. MINERAL RESOURCES

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion:

XI. (a-b) No **Impact**. The project site does not contain any locally or regionally significant mineral resources. Future development of the project site will not create an adverse impact upon locally or regionally significant resources since there are no such resources located on the project site.

Recommended Mitigation Measures: No mitigation required.

Sources:

City of Santa Rosa General Plan, 2035

	Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporation	Less-Than- Significant Impact	No Impact
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XIII. NOISE

Would the project result in:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion

XII. (a-f) **No Impact.** The City’s General Plan 2035 recognizes that noise nuisances from highways, arterial streets, and railroad operations will not be eliminated and will continue to be an inevitable part of the living environment in Santa Rosa. This forecast would hold true particularly in an urban setting, including the subject site and its environs.

The project site is located more than two miles from the Sonoma County Airport, and is outside of the Airport Land Use Plan planning area. The project site is not within the vicinity of a private airstrip. The project site is located within an area shown on the General Plan 2035 Noise Contours Map ranging from below 60 to 65 decibels (dbA).

Standard Measures:

- Standard City conditions of project approval limit the hours of construction to 7 a.m. to 7 p.m. Monday through Friday and 8 a.m. to 6 p.m. Saturdays. No construction is permitted on Sundays and holidays.

Recommended Mitigation Measures: No mitigation required.

Sources:

City of Santa Rosa General Plan, 2035

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
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XIV. POPULATION AND HOUSING

Would the project:

a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
indirectly (for example, through extension of roads or other infrastructure)?				
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion

XIII. (a-c) **Less than Significant.** The intent of this project is to increase the allowable residential density and make zoning consistent with the General Plan land use designation. The project area is currently developed with three single family residential units and one modular home and is located within walking distance of shopping and other commercial services, public transportation, and all City services are available. While there are no immediate ground-breaking activities proposed, future development of the site could result in the demolition of those structures and require new living accommodations for the existing occupants. The proposed General Plan Amendment and Rezoning will allow development of up to 91 dwelling units. Upon development of the site, assuming a maximum build-out, the project will likely result in population growth.

Sources:

City of Santa Rosa General Plan, 2035

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
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XV. PUBLIC SERVICES

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

a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- | | | | | |
|-----------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d. Parks? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Other public facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion:

XIV. (a-e) **Less than Significant.** The project site is located within the City of Santa Rosa and would receive all necessary public services. Both Fire and Police protection services will be provided by the City of Santa Rosa. The proposal is not anticipated to cause the need for new public services or facilities. Existing fire and police protection will continue to serve the area. Future development will be analyzed to determine the project-related contribution(s) required for school or park facilities.

Recommended Mitigation Measures:

None.

Sources:

City of Santa Rosa General Plan, 2035

Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporation	Less-Than- Significant Impact	No Impact
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XVI. RECREATION

Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion:

XV (a-b) **Less than Significant Impacts.** In-lieu park fees or dedications will be assessed at the time of building permit issuance.

Recommended Mitigation Measures:

No mitigation required

Sources:

City of Santa Rosa General Plan, 2035

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
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XVII. TRANSPORTATION/TRAFFIC

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion:

XVI. (a-b and d) **Less than Significant Impact.** A Traffic Analysis was prepared by Whitlock & Weinberger Transportation, Inc. (W-Trans), dated October 26, 2015 which compares current develop, current development potential, and potential development as a result of the proposed change in General Plan land use and zoning. The expected trip generation, assuming maximum build out of 91 attached residential units, would result in 605 vehicle trips per day, including twelve (12) a.m. peak hour trips and thirteen (13) p.m. peak hour trips.

Future development of the site would be required to comply with City Standards for Level of Service at intersections, in addition to street improvements. These standard measures would reduce traffic and transportation impacts to a level of less than significant, without requiring project-specific mitigation.

XV. (c-f) **No Impact.** A future development proposal will be reviewed by the Fire Department. Adequate emergency access will be required as a project condition of approval based on the design including unit count and site configuration. The project will not impact air traffic patterns nor will it conflict with adopted policies programs supporting alternative transportation.

Recommended Mitigation Measures: No mitigation required.

Sources:

W-Trans Traffic Analysis, dated October 26, 2015

	Potentially Significant Impact	Less-Than- Significant With Mitigation Incorporation	Less-Than- Significant Impact	No Impact
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XVIII. UTILITIES AND SERVICE SYSTEMS

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XVII. (a-g) **Less than Significant Impact.** The subject site would be served by existing City water and sewer services. Adequate water supplies and wastewater treatment plant capacity are available to serve the subject site. New storm drainage facilities may be required to accommodate runoff from future development; standard City conditions will require compliance with the Storm Water Mitigation Plan Guidelines. Adequate landfill capacity would continue to exist through County facilities/contracts to support site build out.

Recommended Mitigation Measures: No mitigation required.

Sources:

City of Santa Rosa General Plan, 2035

	Potentially Significant Impact	Less-Than-Significant With Mitigation Incorporation	Less-Than-Significant Impact	No Impact
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XIX. MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Potentially
Significant
Impact**

**Less-Than-
Significant With
Mitigation
Incorporation**

**Less-Than-
Significant
Impact**

**No
Impact**

on human beings, either directly or indirectly?

Discussion

XVIII. (a-c) **Less-Than-Significant Impact:** Significant impacts to biological and cultural resources are not anticipated.

The project does not have the potential to create impacts which are individually limited but cumulatively considerable. The environmental effects of the project are generally negligible and will be lessened through standard City construction standards and practices at the time of a development project.

Traffic impacts are not anticipated to result in adverse cumulative conditions; the City has adopted circulation policies as part of its General Plan Transportation Element that regulate traffic movement and require construction of project improvements to ensure traffic safety. Moreover, at the time physical development is proposed, the City of Santa Rosa will assess potential impacts and/or mitigations relative to traffic based on the merits of that project. Foreseeable impacts include, but are not limited to, both Marlow Road and Guerneville Road and the intersection where they connect; sight distance and level of service (existing, existing plus site, existing plus site and future 2035 projection) at each access point as well as the signalized intersections to the north and south.

Long-term traffic impacts related to General Plan build-out (2035 scenario) and cumulative traffic conditions will be addressed by ongoing City efforts to pursue alternative transportation modes, including increased use of public transit and other Transportation Systems Management methods.

The proposal does not present potentially significant impacts which may cause adverse impacts upon human beings, either directly or indirectly. The ultimate development project will be conditioned to make City standard improvements with respect to noise impacts, roadways and storm drainage. Future building and improvement plans will be reviewed to ensure compliance with applicable building codes and standards.

Recommended Mitigation Measures: No mitigation required.

Sources:

City of Santa Rosa General Plan, 2035

APPENDIX

SOURCE REFERENCES

The following is a list of references used in the preparation of this document. Unless attached herein, copies of all reference reports, memorandums and letters are on file with the City of Santa Rosa Community Development Department . References to Publications prepared by Federal or State agencies may be found with the agency responsible for providing such information.

- 1) City of Santa Rosa 2035 General Plan, adopted November 3, 2009 and Final EIR, certified November 2009 (SCH No. 2008092114).
- 2) City of Santa Rosa Zoning Code, 2006
- 3) California Emissions Estimator Model Report, for the proposed Aston Way Development, dated June 2, 2015
- 4) City of Santa Rosa Geographic Information Systems
- 5) County Assessor’s Property Record (for Williamson Act Contract
- 6) City of Santa Rosa, Cultural Heritage Survey, Historic Properties Inventory, April 1990
- 7) Regional Water Quality Control Board, (Telephone Conversation with Jo Bentz, on December 17, 2015)
- 8) Trip Generation Analysis prepared by W-Trans, dated October 26, 2015
- 9) Biological Resource Assessment prepared by Ted P. Winfield, Ph.D, dated August 31, 2015
- 10) Storm Drain Analysis prepared by Civil Design Consultants, dated July 16, 2015
- 11) Tree Inventory prepared by Horticultural Associates, dated October 28, 2015
- 12) Cultural Resources Survey prepared by Tom Origer & Associates, dated August 27, 2015

PROJECT SPONSOR’S INCORPORATION OF MITIGATION MEASURES

As the project sponsor or the authorized agent of the project sponsor, I, _____, undersigned, have reviewed the Initial Study for the _____ and have particularly reviewed all mitigation measures and monitoring programs identified herein. I accept the findings of the Initial Study and mitigation measures and hereby agree to modify the proposed project applications now on file with the City of Santa Rosa to include and incorporate all mitigation measures and monitoring programs set out in this Initial Study.

Property Owner (authorized agent)

Date

DETERMINATION FOR PROJECT

On the basis of this Initial Study and Environmental Checklist I find that the proposed project (choose the appropriate text):

could not have a Potentially Significant Effect on the environment. A Negative Declaration will be prepared.

could have a Potentially Significant Effect on the environment; however, the aforementioned mitigation measures to be performed by the property owner (authorized agent) will reduce the potential environmental impacts to a point where no significant effects on the environment will occur. A Negative Declaration will be prepared.

Signature

Date

Susie Murray

City Planner

Printed Name

Title

REPORT AUTHORS AND CONSULTANTS

Susie Murray, City Planner

City of Santa Rosa, Community Development Department.

Attachments:

1. Trip Generation Analysis prepared by W-Trans, dated October 26, 2015
2. Biological Resource Assessment prepared by Ted P. Winfield, Ph.D, dated August 31, 2015
3. Storm Drain Analysis prepared by Civil Design Consultants, dated July 16, 2015
4. Tree Inventory prepared by Horticultural Associates, dated October 28, 2015
- 5.