

Addendum
851 Brittain Lane Subdivision Project
City of Santa Rosa, Sonoma County, California

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Table of Contents

Acronyms and Abbreviations	v
Section 1: Introduction	1
1.1 - Environmental Checklist	1
1.2 - Environmental Analysis and Conclusions	1
1.3 - Mitigation Monitoring Program	2
Section 2: Project Description	3
2.1 - Location and Setting	3
2.2 - Project Background	4
2.3 - Project Characteristics	4
2.4 - Discretionary Approvals	7
Section 3: CEQA Checklist	21
3.1 - Explanation of Checklist Evaluation Categories	21
3.2 - Discussion and Mitigation Sections	22
I. Aesthetics, Light, and Glare	24
II. Agricultural and Forest Resources	28
III. Air Quality	32
IV. Biological Resources	62
V. Cultural and Tribal Cultural Resources	71
VI. Energy	77
VII. Geology, Seismicity, and Soils	84
VIII. Greenhouse Gas Emissions	91
IX. Hazards and Hazardous Materials	105
X. Hydrology and Water Quality	113
XI. Land Use and Planning	121
XII. Mineral Resources	123
XIII. Noise	125
XIV. Population and Housing	130
XV. Public Services	132
XVI. Recreation	135
XVII. Transportation	137
XVIII. Utilities and Service Systems	141
XIX. Wildfire	146
Section 4: List of Preparers	149
 Appendix A: Air Quality, Greenhouse Gas Emissions, and Energy Supporting Information	
Appendix B: Biological Resources Supporting Information	
Appendix C: Cultural Resources Supporting Information	
C.1 - Confidential Section 106 CRA	
C.2 - BE Evaluation Report	
C.3 - NAHC Correspondence	
C.4 - NWIC Results	
C.5 - Pedestrian Survey Photographs	
Appendix D: Geotechnical Supporting Information	

Appendix E: Hazards and Hazardous Materials Supporting Information**Appendix F: Hydrological Supporting Information****Appendix G: Noise Supporting Information****Appendix H: Transportation Supporting Information****List of Tables**

Table 1: Project Residential Development Summary	5
Table 2: Project Consistency with Applicable Clean Air Plan Control Measures	34
Table 3: Preliminary Construction Schedule	40
Table 4: Construction Emissions.....	41
Table 5: Operational Emissions	43
Table 6: Maximally Impacted Sensitive Receptor in Each Scenario Analyzed.....	49
Table 7: Estimated Health Risks and Hazards During Project Construction—Unmitigated	50
Table 8: Estimated Health Risks and Hazards During Project Construction—Mitigated.....	51
Table 9: Summary of the Cumulative Health Impacts at the Off-site MIR During Construction	53
Table 10: Odor Screening Distances.....	56
Table 11: Annual Project Energy Consumption.....	79
Table 12: Construction Greenhouse Gas Emissions	94
Table 13: Annual Operational GHG Emissions	96
Table 14: City of Santa Rosa Climate Action Plan Consistency with Elements of a Qualified Greenhouse Gas Reduction Strategy.....	97
Table 15: Consistency with Santa Rosa’s Climate Action Plan New Development Checklist	99

List of Exhibits

Exhibit 1: Regional Location Map.....	9
Exhibit 2: Local Vicinity Map Aerial Base	11
Exhibit 3: Roseland Area/Sebastopol Road Specific Plan Area	13
Exhibit 4: Conceptual Site Plan	15
Exhibit 5: Conceptual Landscape Plan	17
Exhibit 6: Conceptual Stormwater Control Map	19

ACRONYMS AND ABBREVIATIONS

°C	degrees Celsius (Centigrade)
°F	degrees Fahrenheit
µg/m ³	micrograms per cubic meter
AAI	All Appropriate Inquiries
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	asbestos-containing materials
ADT	Average Daily Traffic
AERMOD	American Meteorological Society/EPA Regulatory Model
AFY	acre-feet per year
ASHERA	Asbestos Hazard Emergency Response Act
APE	Area of Potential Effect
APN	Accessor's Parcel Number
AQP	Air Quality Plan
ARB	California Air Resources Board
ASTM	American Society of Testing and Materials
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
BRA	Biological Resources Assessment
C _{AIR}	toxic air contaminant concentration from air dispersion model (µg/m ³)
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARE	Community Air Risk Evaluation
CBC	California Building Standards Code
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CGS	California Geologic Survey
CMA	Congestion Management Agency
CMP	Congestion Management Program
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent

Acronyms and Abbreviations

CWA	Clean Water Act
DBR	Daily Breathing Rate
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
EMFAC	Emissions Factors mobile source emissions model
EOP	Emergency Operations Plans
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
EV	electric vehicle
FCS	FirstCarbon Solutions
FEIR	Final Environmental Impact Report
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
GHG	greenhouse gas
GIS	Geographic Information System
HI	health index
HRA	Health Risk Assessment
HVAC	heating, ventilation, and air conditioning
IM	Implementation Measure
in/sec	inch per second
JMC	Johnson Marigot Consulting, LCC
kBTU	kilo-British Thermal Unit
kW	kilowatts
kWh	kilowatt-hours
LAFCo	Local Agency Formation Commission
LBP	lead-based paint
lbs	pounds
L _{dn}	day/night average noise level
L _{eq}	equivalent noise/sound level
LID	Low Impact Development
L _{max}	maximum noise/sound level
LRA	Local Responsibility Area
mgd	million gallons per day
MIR	Maximally Impacted Sensitive Receptor
MM	Mitigation Measure
MMBTU	Million Metric British Thermal Units

MMRP	Mitigation Monitoring and Reporting Program
mph	miles per hour
MS4	Municipal Separate Storm Sewer System
MT	metric tons
MW	megawatt
MWh	megawatt-hour
ND	Negative Declaration
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
OEHHA	California Office of Environmental Health Hazard Assessment
OHP	California Office of Historic Preservation
OSHA	Occupational Safety and Health Administration
PDA	Priority Development Area
PG&E	Pacific Gas and Electric Company
PI	plasticity index
PM ₁₀	particulate matter 10 microns or less in diameter
PM _{2.5}	particulate matter 2.5 microns or less in diameter
PPV	peak particle velocity
PRC	Public Resources Code
RASRSP	Roseland Area/Sebastopol Road Specific Plan
REC	Recognized Environmental Condition
REL	Reference Exposure Level
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCTA	Sonoma County Transportation Authority
SR	State Route
SRFD	Santa Rosa Fire Department
SRPD	Santa Rosa Police Department
State Water Board	California State Water Resources Control Board
SWPPP	Storm Water Pollution Prevention Plan
TA-1	Treatment Area 1
TA-2	Treatment Area 2
TA-3	Treatment Area 3
TAC	toxic air contaminant
TAZ	Traffic Analysis Zone
TIA	Traffic Impact Analysis
TIS	Traffic Impact Study

Acronyms and Abbreviations

USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	volatile organic compounds
WELO	Water Efficient Landscape Ordinance
WWTP	Wastewater Treatment Plant

SECTION 1: INTRODUCTION

This Addendum, checklist, and attached supporting documents have been prepared to determine whether and to what extent the Roseland Area Project Final Environmental Impact Report (2016 FEIR) (State Clearinghouse No 2016012030) prepared for the City of Santa Rosa remains sufficient to address the potential impacts of the proposed 2016 FEIR (proposed project), or whether additional documentation is required under the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] § 21000, *et seq.*).

1.1 - Environmental Checklist

Pursuant to Public Resources Code Section 21166, and CEQA Guidelines Sections 15162 and 15164, subd. (a), the attached Addendum has been prepared to evaluate the proposed project. The attached Addendum uses the standard environmental checklist categories provided in Appendix G of the CEQA Guidelines but provides answer columns for evaluation consistent with the considerations listed under CEQA Guidelines Section 15162, subd. (a).

1.2 - Environmental Analysis and Conclusions

CEQA Guidelines Section 15164, subd. (a) provides that the lead agency or a responsible agency shall prepare an Addendum to a previously certified Environmental Impact Report (EIR) or Negative Declaration (ND) if some changes or additions are necessary but none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR or ND have occurred (CEQA Guidelines, § 15164, subd. (a)).

An Addendum need not be circulated for public review but can be included in or attached to the Final EIR or ND (CEQA Guidelines § 15164, subd. (c)). The decision-making body shall consider the Addendum the Final EIR prior to making a decision on the proposed project (CEQA Guidelines § 15164, subd. (d)). An agency must also include a brief explanation of the decision not to prepare a subsequent EIR or ND pursuant to Section 15162 (CEQA Guidelines § 15164, subd. (e)).

Consequently, once an EIR or ND has been certified for a project, no subsequent EIR or ND is required under CEQA unless, based on substantial evidence:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or ND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;¹
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or ND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

¹ CEQA Guidelines Section 15382 defines “significant effect on the environment” as “. . . a substantial, or potentially substantial adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance . . .” (see also Public Resources Code [PRC], § 21068).

- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, or the ND was adopted. . . shows any of the following:
- A. The project will have one or more significant effects not discussed in the previous EIR or ND.
 - B. Significant effects previously examined will be substantially more severe than shown in the previous EIR or ND.
 - C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative.
 - D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or ND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative (CEQA Guidelines, Section 15162, subd. (a); see also Public Resources Code, Section 21166).

This Addendum, checklist, and attached documents constitute substantial evidence supporting the conclusion that preparation of a supplemental or subsequent EIR or ND is not required prior to approval of the above-referenced permits by responsible and trustee agencies and provides the required documentation under CEQA.

This Addendum addresses the conclusions of the 2016 FEIR.

1.2.1 - Findings

There are no substantial changes proposed by the proposed project or under the circumstances in which the proposed project would be undertaken that would require major revisions of the 2016 FEIR. The proposed revisions do not require preparation of a new subsequent or supplemental EIR, due to either the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. As illustrated herein, the proposed project is consistent with the previous 2016 FEIR and would involve only minor changes; therefore, an Addendum is appropriate CEQA compliance for the proposed project.

1.2.2 - Conclusions

The City of Santa Rosa may approve the proposed project based on this Addendum. The impacts of the proposed project remain within the impacts previously analyzed in the EIR (CEQA Guidelines § 15164).

1.3 - Mitigation Monitoring Program

As required by Public Resources Code Section 21081.6, subd. (a)(1), a Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the proposed project in order to monitor the implementation of the mitigation measures that have been adopted for the proposed project. Any long-term monitoring of mitigation measures imposed on the overall development will be implemented through the MMRP.

SECTION 2: PROJECT DESCRIPTION

2.1 - Location and Setting

2.1.1 - Location

The approximately 5.92-acre project site is located at 851 Brittain Lane in the City of Santa Rosa (City), in Sonoma County (County), California (Exhibit 1). The project site is generally bounded by two single-family residences to the north, with Joe Rodota Trail and State Route (SR) 12 just beyond; Brittain Lane to the east; Sebastopol Road to the south; and the Bayside Church (Santa Rosa Campus) to the west. The project site is identified as Assessor's Parcel Number (APN) 035-063-035 and is located on the *Sebastopol, California* United States Geological Survey (USGS) 7.5-minute Topographic Quadrangle Map, Township 7 North, Range 8 West (Exhibit 2).

The project site is located within the Roseland Areas/Sebastopol Road Specific Plan area as described in the 2016 FEIR (Specific Plan area), which encompasses approximately 1,860 acres in the southwestern portion of the City (Exhibit 3). The project site is located within one of the three annexation areas identified in the Roseland Area/Sebastopol Road Specific Plan (RASRSP) and Roseland Area Annexation Project Environmental Impact Report (previous EIR); specifically, the Brittain Lane Annexation area is located west of the Specific Plan area, encompassing approximately 17 acres generally bounded by SR-12 to the north, Bayside Church to the west, Brittain Lane to the east, and Sebastopol Road to the south (Exhibit 3). Additionally, the project site is located within one of the City's Priority Development Areas (PDAs), the Sebastopol Road Corridor PDA, which is the area within 0.25 mile of Sebastopol Road from U.S. Highway 101 (US-101) to the western city limit line. New multi-family residential development within one of the City's PDAs is delegated to the Zoning Administrator and is subject to a reduced review through the Minor Design review process.

2.1.2 - Environmental Setting

The majority of the project site is currently undeveloped with one single-family home and associated outbuildings that front Sebastopol Road in the southeast corner of the project site. The single-family home will be vacated by its current tenants prior to construction. The site also contains one single-story building occupied by Outlaws Customs and Classics in the southwest corner. Vehicular access to the site is currently provided via an unsignalized driveway off Sebastopol Road.

The project site's ground cover consists of grassy vegetation with dispersed trees around the perimeter of the site, including several mature trees along the eastern border, along Brittain Lane. The surrounding neighborhood is characterized as a rural suburban neighborhood of low to moderate development density with scattered vacant parcels. Close-range views are dominated by older single-family homes, large yards with turf and trees, narrow roadways with unimproved shoulders, low fencing, and overhead utility lines. Long-range views are largely obscured by the abundant mature trees and vegetation present throughout the area. The site and surrounding area do not contain any creeks, lakes, or other open bodies of water.

2.1.3 - General Plan and Zoning

The City of Santa Rosa General Plan 2035 (General Plan) designates the project site as Medium Density Residential, which allows for 8 to 18 units per acre.

The site is zoned as Multi-Family Residential (R-3-18). This zoning district is applied to areas within the City that are appropriate for residential neighborhoods with medium and higher residential densities, to provide home rental and ownership opportunities and to provide a full range of choices in housing types to improve access to affordable housing. The maximum number of dwelling units per parcel is one unit per 2,400 square feet. The proposed project would be consistent with this requirement and is not requesting any variances to development standards associated with the R-3-18 zone district.

The proposed project would be a Housing Development Project within the meaning of Government Code Section 65589.5(h)(2) and has been designed to comply with applicable objective General Plan and subdivision standards and criteria as described in Government Code Section 65589.5(j).

2.2 - Project Background

2.2.1 - Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation (RASRSP)

The Santa Rosa City Council adopted the RASRSP and certified the previous EIR in 2016. As discussed above, the previous EIR evaluated the environmental impacts of the proposed RASRSP and annexation of multiple parcels in the southwestern portion of the City. These annexations included all existing unincorporated islands, which are defined as areas of unincorporated land that are substantially surrounded by City land. The RASRSP's buildout potential is 3,691 dwelling units and 881,879 square feet of nonresidential uses.

The proposed project is located fully within the Brittain Lane Annexation area as outlined in the previous EIR. Under the previous EIR, all vacant parcels in the annexation areas were assumed to be annexed to the City in the future and developed consistent with the existing General Plan land use designations and the requirements of the RASRSP. In 2017, the project site was annexed into the City as part of a larger annexation of multiple islands in southwest Santa Rosa via Local Agency Formation Commission (LAFCo) Resolution No 2576.

2.3 - Project Characteristics

2.3.1 - Project Summary

Residential Development

The proposed project includes the development of 82 townhome-style, 2-story condominiums, which will be fully electric and powered by on-site solar facilities. The proposed condominiums would range in size and bedroom count and each condominium would include a private garage (Exhibit 4). Table 1, below, details the project residential development summary, including the

approximate size of residences, garages, and deck/patios. The proposed project's density ratio would be approximately 14.3 dwelling units per net acre.

Table 1: Project Residential Development Summary

Unit Type	Residential Square Feet ¹	Garage Type	Garage Square Feet ¹	Deck/Patio Square Feet ¹	Count
3-bedroom	1,475	2-bay	400	120	26
3-bedroom	1,715	2-bay	420	210	22
4-bedroom	1,880	2-bay	480	220	26
4-bedroom	1,900	2-bay	470	360	8
Total	—	—	—	—	82
Notes: ¹ All square footages are approximate. Source: City Ventures 2022.					

Open Space

The proposed project would include approximately 44,370 square feet of open space, approximately 16,340 square feet of which would be private space consisting of patios and decks and approximately 28,030 square feet of which would be common space, divided into five amenity areas throughout the project site, as shown in Exhibit 4.

Design and Appearance

Architecture would be traditional in character and would be consistent with the surrounding uses. The architecture and the site plan are intended to integrate the Design Guidelines of the General Plan for a residential project. The project site would be fully landscaped as further described on Exhibit 5.

2.3.2 - Circulation and Parking

Access to the project site would be available via two driveways along Brittain Lane that would allow for both ingress and egress of vehicles. There would also be one driveway along Sebastopol Road that would allow for vehicle ingress and egress through a right-turn only. The project site would also include new private roads for internal circulation, as shown in Exhibit 4. Private roads have been provided via a State Density Bonus waiver to the design standards for public streets.

The proposed project would include a total of 206 parking spaces, including 42 guest spaces and 164 spaces within the private garages of the 82 condominium units. There would also be 14 off-site street parking spaces along the west side of Brittain Lane.

The proposed project would construct a Class II bike lane along the proposed project's frontage, consistent with City's Bicycle and Pedestrian Master Plan Update. The proposed project would also include bicycle parking in each unit garage.

2.3.3 - Utilities

Water and Wastewater

The proposed condominiums would connect to existing water lines and sanitary sewer lines located within Sebastopol Road. Water and wastewater services would be provided by the City.

Stormwater

The majority of the project site is flat; currently, runoff flows mostly overland towards the southwest corner of the project site and eventually enters an existing shallow swale along the southern boundary of the project site, paralleling the northern Sebastopol Road shoulder. This swale's flows discharge to an at-grade, grated inlet at its western edge, and are then conveyed west in a series of storm drains/culverts and shallow swales to Justin Drive, where a formal, continuous storm drain systems continues to the Highway 12 undercrossing and Riocas Creek.

Under the proposed project, direct stormwater runoff from the bulk of the residential units on the project site would be directed to 25 Priority 1 (P1-06) bioretention facilities within Treatment Area 1 (TA-1) for treatment. These bioretention facilities include vegetated basins with 18 inches of engineered soil designed to filter contaminants from stormwater and encourage infiltration. Stormwater runoff that exceeds required treatment and acceptable ponding depths within these bioretention facilities would enter a network of stormwater drains that would eventually discharge into a 24-inch storm drain in the main project driveway of Sebastopol Road, as shown on Exhibit 6. Treated discharge from TA-1 would then be discharged to a duel-vortex separator and then to an NDS StormChamber for retention and infiltration. This configuration satisfies the full vegetative treatment requirements as well as the the Hydromodification Capture Volume requirements for the project site.

Runoff from the west side of Brittain Lane and from an eastern strip of the project site that encompasses meandering walkways and driveway access points, delineated as Treatment Area 2 (TA-2), would receive treatment via four Priority 2 (P2-04) bioretention cells with curb-cut inlets. Similarly, runoff from the north side of Sebastopol Road, delineated as Treatments Area 3 (TA-3), would be treated by two additional Priority 2 (P2-04) vegetated swale segments with curb-cut inlets. The resulting TA-3 treatment rate would fully satisfy the project's Low Impact Development (LID) treatment requirements; however, due to the presence of matures trees along portions of the west side of Brittain Lane, full vegetative treatment was not possible to achieve for TA-2.

Overall, the proposed project's storm drain design would utilize the proposed stormwater hydromodification capture and infiltration system (with subsurface StormChamber containment) and efficient off-site conveyance of flows in the proposed storm drain system in Sebastopol Road to satisfy the 10-year stormwater evacuation requirements in less than 72 hours and mitigate any possible vector control issues.

Electricity

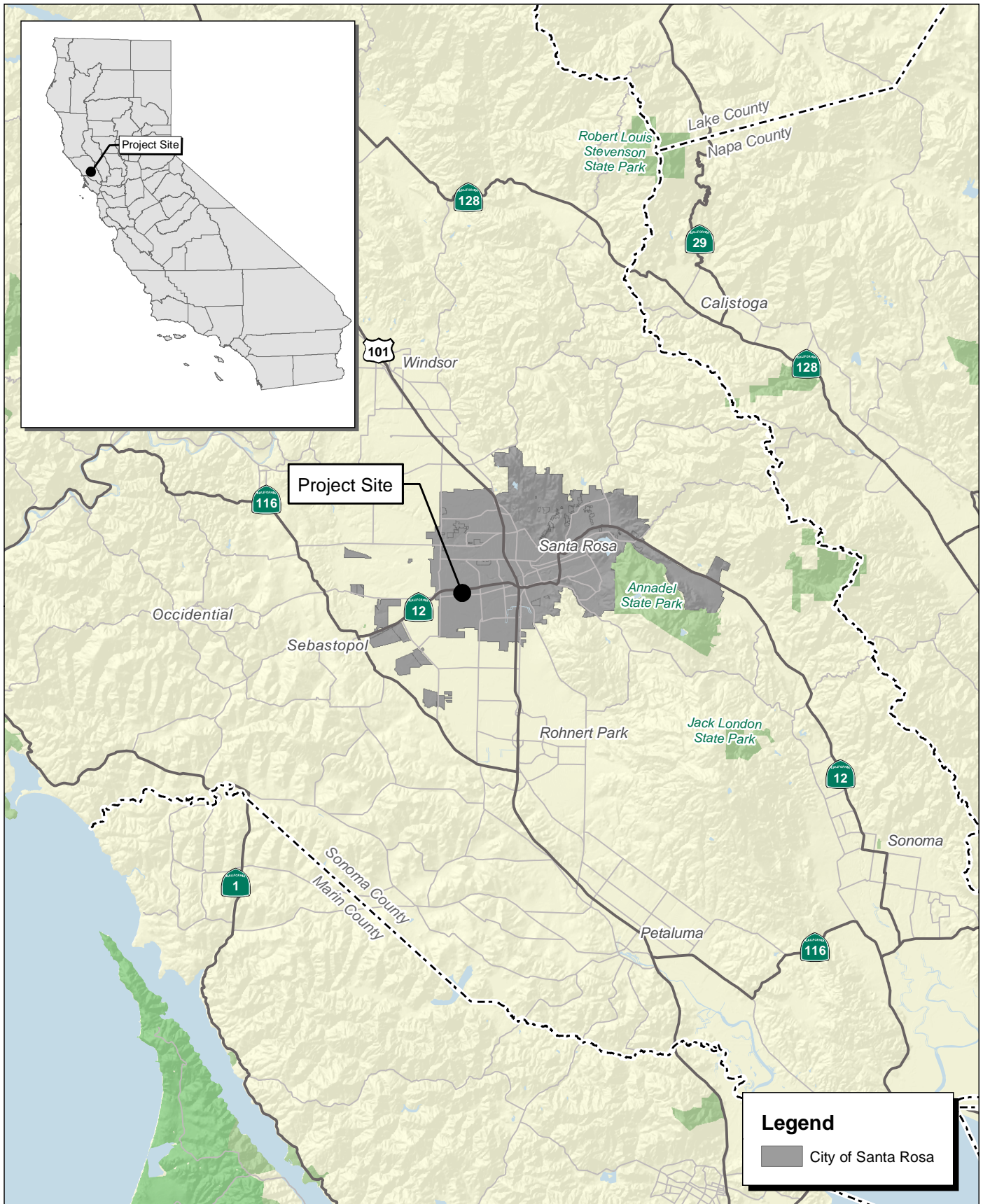
The proposed development would be fully electric and include on-site solar facilities.

2.4 - Discretionary Approvals

The proposed project requires the following discretionary approvals from the City of Santa Rosa:

- Site Development Review Permit
- Minor Design Review Permit
- Vesting Tentative Tract Map Permit
- Senate Bill 330 Application
- Density Bonus

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Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

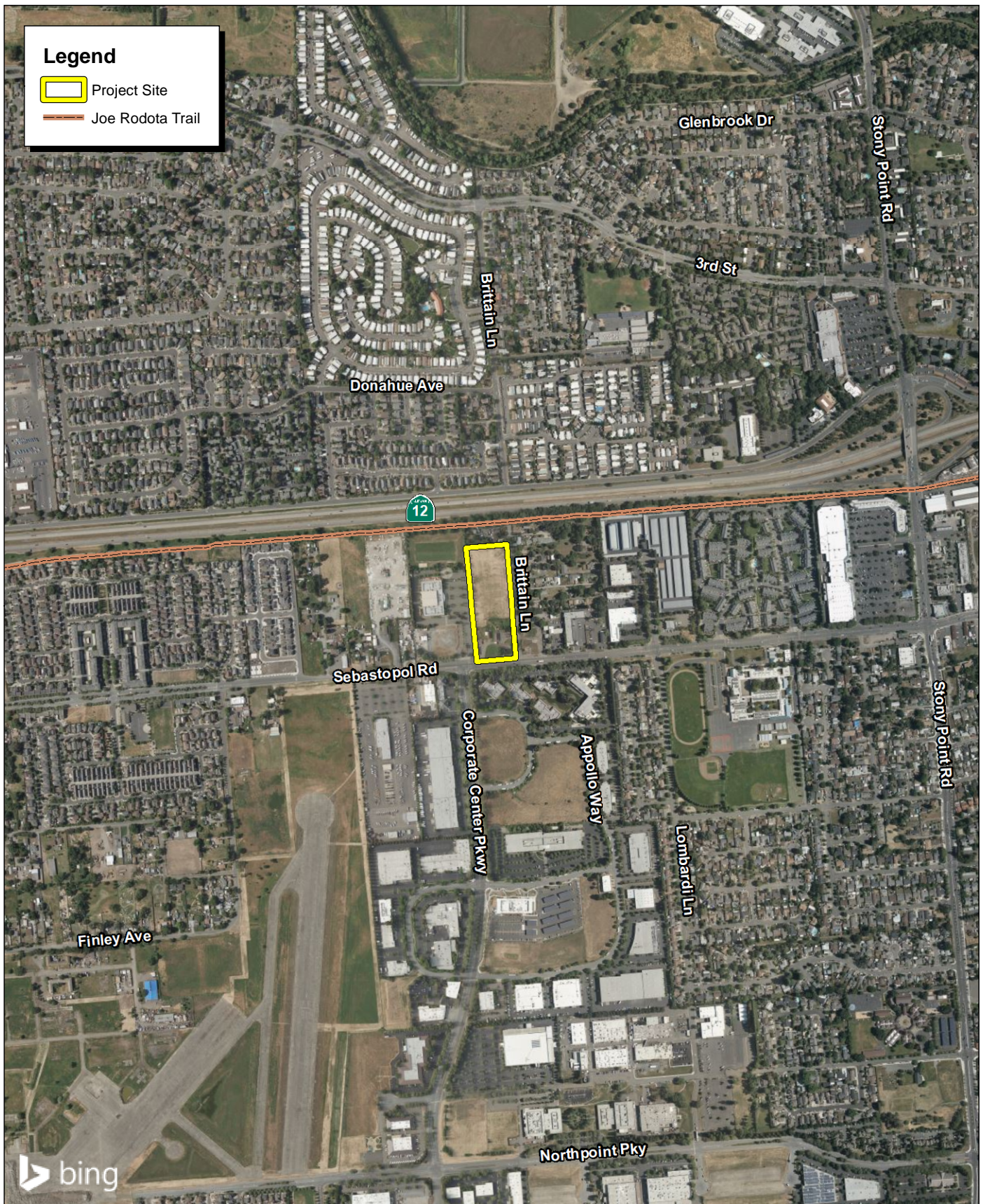
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Miles

Exhibit 1 Regional Location Map

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Source: Bing Aerial Imagery. Parklands Data: ISD GIS

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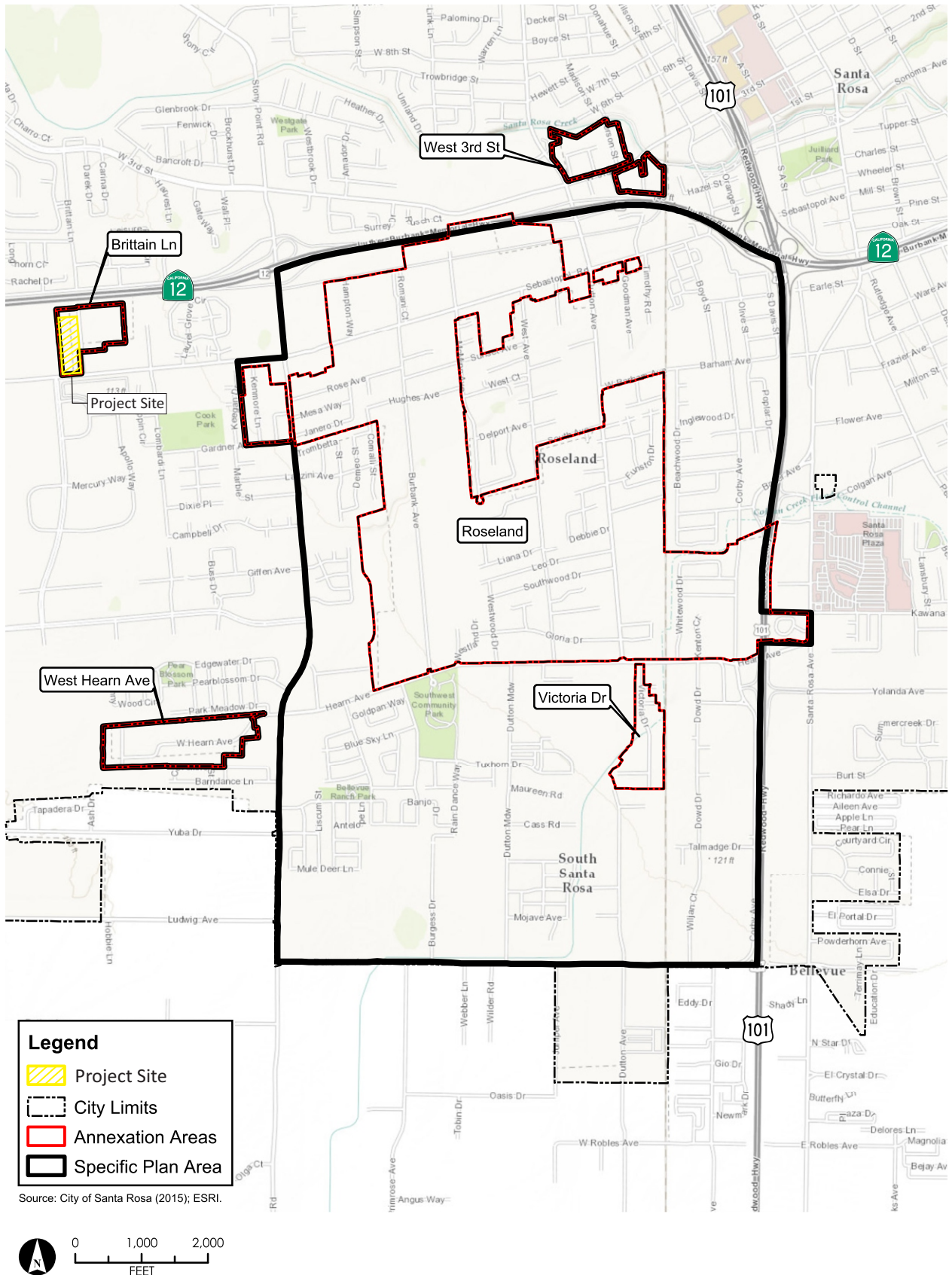
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Exhibit 2 Local Vicinity Map Aerial Base

CITY OF SANTA ROSA
851 BRITAIN LANE SUBDIVISION PROJECT
ADMINISTRATIVE DRAFT ADDENDUM

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Source: Michael Baker International, May 2016.

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Exhibit 3 Roseland Area/Sebastopol Road Specific Plan Area

CITY OF SANTA ROSA
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ADMINISTRATIVE DRAFT ADDENDUM

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Source: TARRAR Utility Consultants. Vero Consultants. C2 Collaborative. Fournier Design Studio. August 22, 2022.

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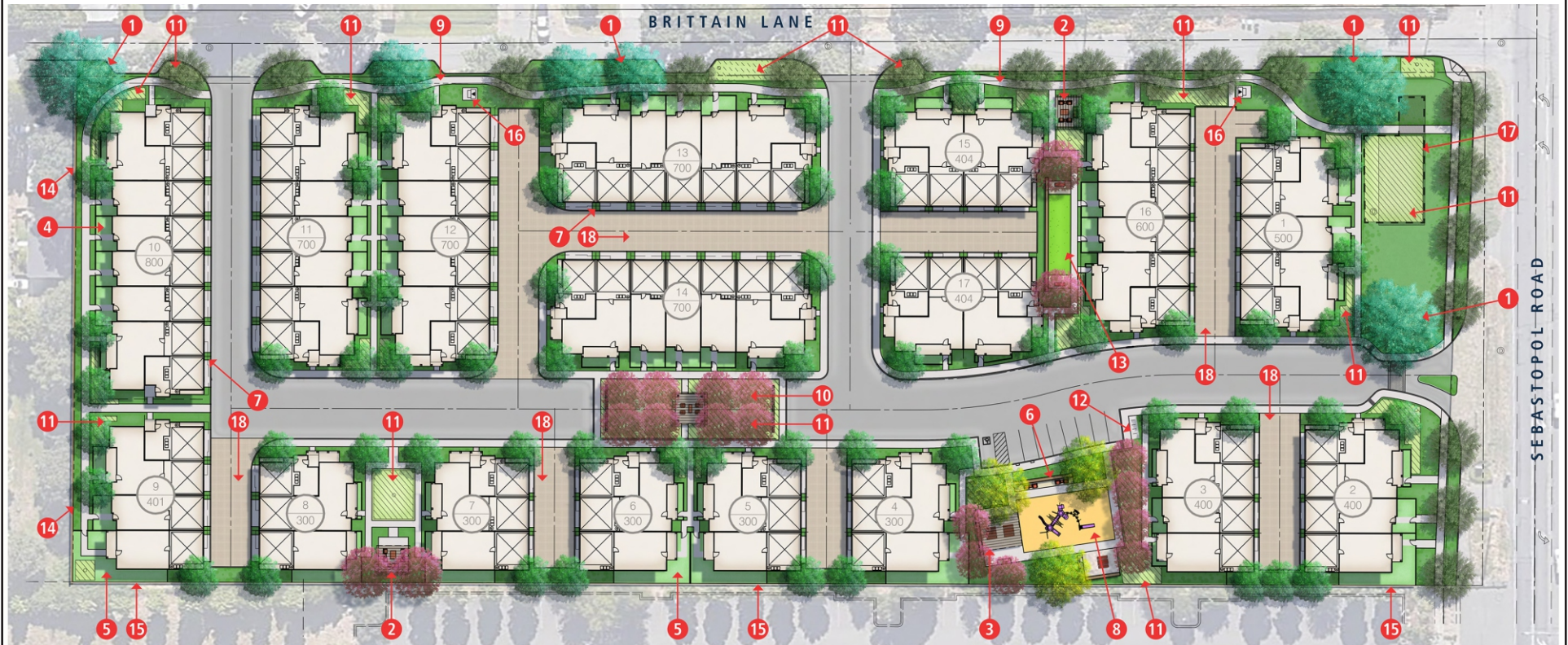


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Exhibit 4 Conceptual Site Plan

CITY VENTURES
851 BRITTAINE LANE SUBDIVISION PROJECT
FINAL ADDENDUM

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LEGEND

- | | | |
|-----------------------------|--|---|
| 1 Existing trees | 7 Planting pocket with vine at garages | 13 Game lawn (Cornhole) |
| 2 Seating area | 8 Kids play area | 14 Perimeter fence 'A' - 8'H with lattice top |
| 3 Barbecue area with tables | 9 Meandering walk | 15 Perimeter fence 'B' - 6'H solid |
| 4 Private patios | 10 Pocket park | 16 Transformer |
| 5 Private yard space | 11 Bioretention basins | 17 Hydromod vault with open bottom |
| 6 Lounge seating area | 12 Bicycle parking | 18 Pervious pavers (See Civil sheets) |

Source: TARRAR Utility Consultants. Vero Consultants. C2 Collaborative. Fournier Design Studio. August 22, 2022.

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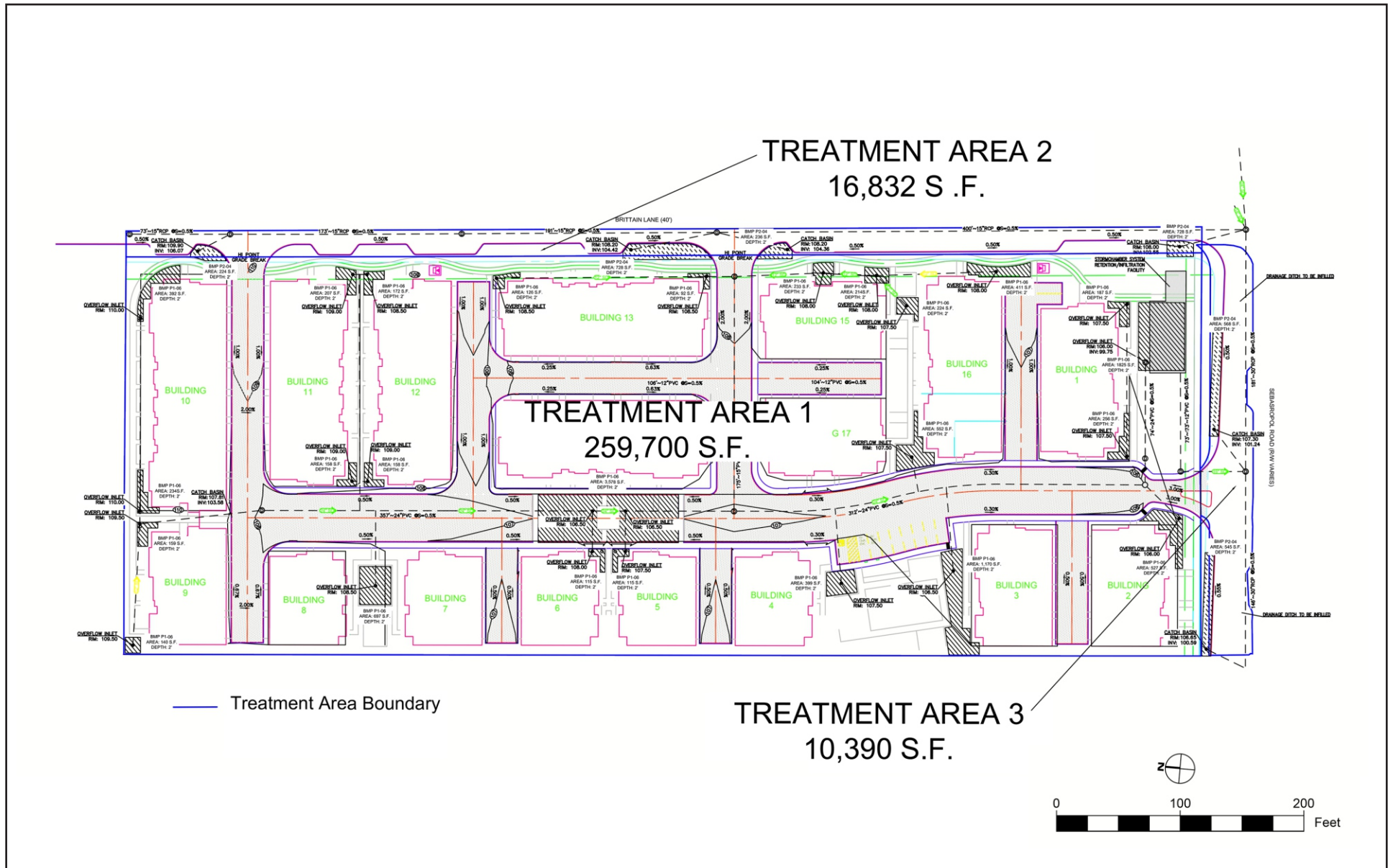


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Exhibit 5 Conceptual Landscape Plan

CITY VENTURES
851 BRITAIN LANE SUBDIVISION PROJECT
FINAL ADDENDUM

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SECTION 3: CEQA CHECKLIST

The purpose of the checklist is to evaluate the categories in terms of any changed condition (e.g., changed circumstances, project changes, or new information of substantial importance) that may result in a changed environmental result (e.g., a new significant impact or substantial increase in the severity of a previously identified significant effect) (CEQA Guidelines § 15162).

The questions posed in the checklist come from Appendix G of the CEQA Guidelines. A “no” answer does not necessarily mean that there are no potential impacts relative to the environmental category but that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the Final EIR. These environmental categories might be answered with a “no” in the checklist since the proposed project does not introduce changes that would result in a modification to the conclusion of the previously approved CEQA document.

This Addendum addresses the conclusions of the 2016 FEIR.

3.1 - Explanation of Checklist Evaluation Categories

(1) Conclusion in Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR and Related Documents

This column summarizes the conclusion of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR (previous EIR) relative to the environmental issue listed under each topic.

(2) Do the Proposed Changes Involve New Impacts?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(1), this column indicates whether the changes represented by the revised project will result in new significant environmental impacts not previously identified or mitigated by the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation FEIR or whether the changes will result in a substantial increase in the severity of a previously identified significant impact.

(3) New Circumstances Involving New Impacts?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(2), this column indicates whether there have been substantial changes with respect to the circumstances under which the project is undertaken that will require major revisions to the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(4) New Information Requiring New Analysis or Verification?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3)(A-D), this column indicates whether new information of substantial importance, which was not known and could not have been

known with the exercise of reasonable diligence at the time the previous EIR was adopted, shows any of the following:

- (A) The project will have one or more significant effects not discussed in the previous EIR.
- (B) Significant effects previously examined will be substantially more severe than shown in the previous Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation FEIR.
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation FEIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If the additional analysis completed as part of this environmental review were to find that the conclusions of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation FEIR remain the same and no new significant impacts are identified, or identified impacts are not found to be substantially more severe, or additional mitigation is not necessary, then the question would be answered “no” and no additional environmental document would be required.

(5) Mitigation Measures Implemented or Address Impacts

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3), this column indicates whether the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation FEIR provides mitigation measures to address effects in the related impact category. Any previously adopted mitigation measures will be identified. The response will also address proposed revisions to previously adopted mitigation measures. These mitigation measures will be implemented with the construction of the project, as applicable. If “NA” is indicated, the Final EIR has concluded that the impact either does not occur with this project or is not significant and therefore no additional mitigation measures are needed.

3.2 - Discussion and Mitigation Sections

(1) Discussion

A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

(2) Mitigation Measures

Applicable mitigation measures from the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation FEIR that apply to the proposed project are listed under each environmental category.

(3) Conclusions

A discussion of the conclusion relating to the analysis is contained in each section.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
I. Aesthetics, Light, and Glare <i>Except as provided in Public Resources Code Section 21099, would the project:</i>					
a) Have a substantial adverse effect on a scenic vista?	Less than significant impact.	No	No	No	None
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	No impact.	No	No	No	None
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than significant impact.	No	No	No	None
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The City is surrounded by foothills, which are prominently visible from many locations throughout the flatlands of the City. Presently, the City does not have any officially designated scenic vistas. However, the General Plan includes Policies UD-A-1 and UD-A-8 which protect views of the natural hillsides and ridgelines visible from the City, specifically Taylor Mountain

and Bennett Mountain. As such, the RASRSP and the previous EIR concluded that buildout would not adversely impact scenic vistas because development would be subject to the provisions of the General Plan that pertain to preservation of views. Therefore, the EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

Taylor Mountain and its associated foothills are visible from various vantage points on the project site. The proposed project would result in the development of 82 dwelling units on the 5.74-acre project site. The density would be 14.3 dwelling units per acre. The dwelling units would stand approximately 29 feet, 6 inches above finished grade, which would be consistent with the surrounding area. As a result, existing views of the surrounding foothills would largely remain unchanged. Additionally, the proposed project would be required to comply with the applicable General Policies, including General Plan Policies UD-A-1, UD-A-8, and UD-A-9, all of which protect views of the ridgelines and hillsides that surround the City. Further, consistent with UD-B-6, the proposed project would be required to undergo the City's design review process, which reviews plans for new development to ensure consistency with the Design Guidelines that were adopted to implement the Urban Design Element of the General Plan. Thus, the proposed project would not adversely impact views of a scenic vista and would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The California Department of Transportation (Caltrans) administers the California Scenic Highway Program, which was developed to preserve and protect State Scenic Highway corridors from changes that would affect the aesthetic value of the land adjacent to scenic highways. There are two highways in the vicinity of the Specific Plan area: US-101, which runs along the eastern portion the Specific Plan area, and SR-12, which runs along the northern portion of the Specific Plan area. The previous EIR concluded that buildout would not adversely impact the viewshed of a State Scenic Highway because neither of the identified portions of US-101 nor SR-12 that are adjacent to the Specific Plan area are designated State Scenic Highways. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The portions of SR-12 and US-101 that are closest to the project site are neither eligible nor officially designated State Scenic Highways. A portion of SR-12 from where it meets US-101 east of the project site toward the City of Kenwood is an eligible State Scenic Highway.² However, the project site is not visible from any portion of SR-12 or US-101 due to intervening vegetation and structures. Additionally, the proposed project would be required to comply General Plan Goal T-G, which protects scenic roadways. Further, as discussed above and consistent with General Plan Policy UD-B-6, the proposed project would undergo design

² California Department of Transportation (Caltrans). 2022. State Scenic Highway Map Viewer. Available: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacc>. Accessed June 3, 2022.

review, which would ensure that the building's design does not impact State Scenic Highways. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not degrade the visual character of the area because it is mostly built out, and that adherence to General Plan goals, policies, and design guidelines would ensure that new development is compatible with its surroundings. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would result in the development of 82 dwelling units on the 5.74-acre project site. The density would be 14.3 dwelling units/acre. The dwelling units would stand approximately 29 feet, 6 inches above finished grade, which would be consistent with the surrounding area. Furthermore, consistent with General Plan Policy UD-B-6, the project would undergo design review for compliance with applicable City standards. Thus, the proposed project would not degrade the visual character of the project site or its surroundings. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not introduce new substantial sources of light and glare because future development would comply with the City's Zoning Code provisions that pertain to outdoor lighting. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would result in the development of 82 dwelling units on the 5.74-acre project site. Landscape lighting fixtures would consist of freestanding fixtures that would stand approximately 18 feet above finished grade. Light fixtures would be full-cutoff (i.e., no up lighting) and Dark Sky Approved, which would prevent light trespass onto surrounding properties. Additionally, as discussed above, the proposed project would undergo design review to ensure that lighting features are consistent with the City's Design Guidelines. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to aesthetics, light, and glare. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
II. Agricultural and Forest Resources <i>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 Department 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:</i>					
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 nonagricultural use?	No impact.	No	No	No	None
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No impact.	No	No	No	None
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))?	No impact.	No	No	No	None
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No impact.	No	No	No	None
e) Involve other changes in the existing	No impact.	No	No	No	None

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?					

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that the project boundaries contained Urban Built-Up Land, Farmland of Local Importance, and Other Land, none of which are classified as Important Farmland by the California Department of Conservation. Therefore, the previous EIR concluded that no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The project site is mapped as Urban Built-Up Land by the California Department of Conservation and is not used for cultivated agriculture.³ Thus, development of the proposed project would not convert Important Farmland to nonagricultural use. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that there were no parcels within the project boundaries that were encumbered by Williamson Act contracts or zoned for agricultural use. Therefore, the previous EIR concluded that no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The project site is zoned by the City Code as R-3-18, which is a nonagricultural zoning district. Additionally, as established by the previous EIR, the project site is presently not encumbered by Williamson Act contracted, and the project site does not support agricultural land use activities and, thus, would not be eligible for a Williamson Act contract. Therefore, the proposed project would not conflict with agricultural zoning or an active Williamson Act contract. As such, the proposed project would not introduce new environmental impacts or

³ California Department of Conservation. 2022. California Important Farmland Finder, 851 Brittain Lane. Available: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed June 3, 2022.

create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that there were no parcels within the project boundaries that were zoned for forest use. Therefore, the previous EIR concluded that no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The project site is zoned by the City Code as R-3-18, a non-forest zoning district. Thus, the proposed project would not conflict with forest zoning. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that there were no parcels within the project boundaries that were used for timber harvesting. Therefore, the previous EIR concluded that no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

As previously discussed, the project site is mapped as Urban Built-Up Land by the California Department of Conservation and is not used for timber production.⁴ Thus, development of the proposed project would not convert timberland to non-timber production use. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

e) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that there were no parcels within the project boundaries that were actively used for agricultural or timber harvesting. Therefore, the previous EIR concluded that no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

As previously discussed, the project site and surroundings are mapped as Urban Built-Up Land by the California Department of Conservation and are not used for agricultural or timber use. Thus, development of the proposed project would not create pressures to convert agricultural or timberland to other use. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

⁴ California Department of Conservation. 2022. California Important Farmland Finder, 851 Brittain Lane. Available: <https://maps.conservation.ca.gov/DLRP/CIFF/>. Accessed June 3, 2022.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to agricultural and forest resources. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
III. Air Quality <i>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</i>					
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than significant impact.	No	No	No	None
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?	Less than significant impact with mitigation incorporated.	No	No	No	MM 3.3.3
c) Expose sensitive receptors to substantial pollutant concentrations?	Less than significant impact with mitigation incorporated.	No	No	No	MM 3.3.5; MM 3.3.6; MM AIR-1
d) Result in other emissions (such as those leading to odors or) adversely affecting a substantial number of people?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that development within the Specific Plan area would comply with Bay Area Air Quality Management District (BAAQMD) construction and operational control measures intended to reduce local and regional air pollutants. Further, the previous EIR found that development would be consistent with General Plan policies intended to improve transit service, bicycle, and pedestrian access to transit, and energy efficiency. As a result, the previous EIR concluded that implementation of the Specific Plan would construct housing and result in jobs adjacent to existing bicycle and pedestrian facilities while improving energy efficiency of structures. Therefore, the previous EIR concluded that the Specific Plan would not conflict with the 2010 Clean Air Plan and impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The BAAQMD does not provide a numerical threshold of significance for project-level consistency analysis with its Air Quality Plans (AQPs). Therefore, the following criteria will be used for determining a project's consistency with the AQP.

- Criterion 1: Does the project support the primary goals of the AQP?
- Criterion 2: Does the project include applicable control measures from the AQP?
- Criterion 3: Does the project disrupt or hinder the implementation of any AQP control measures?

Criterion 1

The primary goals of the 2017 Clean Air Plan, the current BAAQMD AQPs to date, are to:

- Attain air quality standards.
- Reduce population exposure to unhealthy air and protect public health in the Bay Area.
- Reduce greenhouse gas (GHG) emissions and protect the climate.

A measure for determining whether the proposed project supports the primary goals of the AQP is if the proposed project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQPs. This measure is determined by evaluating whether the proposed project was reasonably accounted for in the AQP.

The Specific Plan was adopted in November 2016, which was prior to the BAAQMD's adoption of the latest 2017 AQP.

The project site is designated Medium Density Residential by the General Plan and zoned Multi-Family Residential (R-3-18) by the Specific Plan. The proposed project's residential uses are allowable with both the Specific Plan and Zoning Code. Additionally, the project's density (14.3 dwelling units per acre) is within the 8 to 18 units per acre range allowed by the General Plan and Zoning Code. The BAAQMD's latest AQP utilizes growth projections from Plan Bay Area 2040, which relies on growth projections and land use patterns from local general plans and was adopted after the adoption of the General Plan. Thus, development of the project site has been reasonably accounted for in the BAAQMD's latest AQP.

Furthermore, as discussed further in Impact 2.3(b), implementation of the proposed project would not exceed the BAAQMD operational or construction thresholds for criteria pollutants on an average daily or annual basis. Therefore, the proposed project would be consistent with the Criterion 1.

Criterion 2

The 2017 Clean Air Plan contains control measures to reduce air pollutants and GHG emissions at the local, regional, and global levels. Along with the traditional stationary, area, mobile source, and transportation control measures, the 2017 Clean Air Plan contains many control

measures designed to protect the climate and promote mixed use, compact development to reduce vehicle emissions and exposure to pollutants from stationary mobile sources. The 2017 Clean Air Plan also includes an account of the implementation status of control measures identified in the prior 2010 Clean Air Plan.

Table 2 below lists the 2017 Clean Air Plan policies relevant to the proposed project and evaluates the proposed project's consistency with the policies.⁵ As shown below, the proposed project would be consistent with applicable measures.

Table 2: Project Consistency with Applicable Clean Air Plan Control Measures

Control Measure	Project Consistency
Buildings Control Measures	
BL1: Green Buildings	Consistent. The proposed project would not conflict with implementation of this measure. The City of Santa Rosa Municipal Code (Municipal Code) Title 18 Chapter 18-42 Building Code incorporates all measures contained in the 2019 California Building Standards Code (CBC) and Green Building Standards Code includes all measures from Title 24. The proposed project would be required to comply with the latest energy efficiency standards contained in these codes and incorporate applicable energy efficiency features designed to reduce project energy consumption. For example, the proposed project would include low water demand landscaping, which would reduce the amount of energy needed to provide outdoor water. The City would enforce these measures prior to issuance of demolition, grading, construction, or building permits, as applicable.
BL4: Urban Heat Island Mitigation	Consistent. The proposed project would include 76,328 square feet of landscaped area and 44,370 square feet of open space, which would serve to reduce stormwater runoff and would include the planting of shade trees; hence, it would also reduce the urban heat island effect.

⁵ Bay Area Air Quality Management District (BAAQMD). 2017. Final 2017 Clean Air Plan. Website: https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed March 8, 2022.

Control Measure	Project Consistency
Energy Control Measures	
EN1: Decarbonize Electricity Generation	Consistent. The project applicant would, at a minimum, be required to conform to the energy efficiency requirements of the CBC, also known as Title 24. The 2019 Title 24 Standards are the current State building regulations which went into effect on January 1, 2020. Proposed buildings that would receive building permits after January 1, 2020, would be subject to the 2019 Title 24 Standards, including the proposed project. For example, the proposed project would install solar photovoltaic systems capable of generating 144,320 kWh of electricity per year as well as low-flow plumbing fixtures and irrigation heads compliant with Title 24 Standards.
EN2: Decrease Electricity Demand	
Natural and Working Lands Control Measures	
NW2: Urban Tree Planting	Consistent. The proposed project would include 76,328 square feet of landscaped area. Plantings would include trees, shrubs, and groundcover.
WA3: Green Waste Diversion	Consistent. The waste service provider for the proposed project would be required to meet the Assembly Bill (AB) 341, Senate Bill (SB) 939, and SB 1374 requirements that require waste service providers to divert green waste. All vegetation refuse generated during operations of the proposed project would be disposed of off-site.
WA4: Recycling and Waste Reduction	Consistent: The waste service provider for the proposed project would be required to meet the AB 341, SB 939, and SB 1374 requirements that require recyclable waste to be recycled and to remove 75 percent from the landfill waste stream by 2020.
Stationary Control Measures	
SS36: Particulate Matter from Trackout	Consistent with mitigation. The Bay Area Air Quality Management District’s (BAAQMD’s) recommended mitigation measures for construction fugitive dust control would be implemented to reduce fugitive dust and trackout during project construction. In addition, mud and dirt that may be tracked out onto the nearby public roads during construction activities shall be removed promptly by the contractor based on BAAQMD’s requirements. Therefore, the proposed project would be consistent with this measure after implementation of adopted Specific Plan Mitigation Measure (MM) 3.3.3, which is required by the Specific Plan for all development projects.

Control Measure	Project Consistency
SS37: Particulate Matter from Asphalt Operations	Consistent. Asphalt used during the construction of the proposed project would be subject to BAAQMD Regulation 8, Rule 15-Emulsified and Liquid Asphalts. Although this rule does not directly apply to the proposed project, it does limit the reactive organic gases (ROG) content of asphalt available for use during construction through regulating the sale and use of asphalt. By using asphalt from facilities that meet BAAQMD regulations, the proposed project would be consistent with this Clean Air Plan measure.
Transportation Control Measures	
TR9: Bicycle and Pedestrian Access and Facilities.	Consistent. There are no existing sidewalks along the proposed project's frontage on Brittain Lane or Sebastopol Road. There are existing sidewalks across from the project site on Sebastopol Road. Several bus stops are located within a walking distance of the site, including bus line 2 and 2B on Sebastopol Road (170-feet walking distance to the project site) operated by the City of Santa Rosa (CityBus). As part of the proposed project, a new sidewalk would be constructed along the project site's frontage on Sebastopol Road. Additionally, a sidewalk would be constructed between Brittain Lane and the existing terminus of the sidewalk west of Lombardi Lane, providing a continuous sidewalk connection between the project site and the nearby Cook Middle School via the signalized intersection at Lombardi Lane. Therefore, the proposed project would not conflict with the BAAQMD's efforts to encourage planning for bicycle and pedestrian facilities.
Source: Bay Area Air Quality Management District (BAAQMD) 2017.	

In summary, the proposed project would not conflict with any applicable measures under the 2017 Clean Air Plan after the implementation of the adopted Specific Plan Mitigation Measure (MM) 3.3.3, which requires construction activity to demonstrate compliance with BAAQMD construction control measures for all development projects within the Specific Plan planning area. Therefore, the proposed project would be consistent with Criterion 2 after incorporation of mitigation.

Criterion 3

The proposed project would constitute the development and operation of 82 townhomes and would not include any feature or design which could create conditions which prevent the extension of adjacent transit, pedestrian, or bicycle facilities. The proposed project would not alter any existing roadways, including Sebastopol Road, and subsequently any bus routes. The proposed project would include bicycle parking in each unit garage. Based on the City's Bicycle and Pedestrian Master Plan Update, 2018, the City is proposing to construct a Class II bike lane

along Sebastopol Road, west of Corporate Center Parkway and extending to the Joe Rodota Trail. As discussed in the Project Description, the Applicant is proposing to construct the portion of the bike lane along the proposed project's frontage. Additionally, east of Corporate Center Parkway, the City's planned improvements include construction of a Class IV separated bikeway along Sebastopol Road connecting to the SMART Trail that parallels the railroad tracks through the City. The extension of the bike lanes to the west of Corporate Center Parkway would create a connected bicycle link along Sebastopol Road, allowing riders to use it to access the Joe Rodota Trail and from there to either downtown Santa Rosa or Sebastopol Road. The proposed project would include sidewalks along the project frontages on Sebastopol Road, along Brittain Lane, and along the northern property boundary. Therefore, the proposed project would not preclude the extension of a transit line or bike path, propose excessive parking beyond parking requirements, or otherwise create an impediment or disruption to implementation of any AQP control measures. As shown in Table 2 above, the proposed project would incorporate several AQP control measures as project design features, such as complying with energy efficiency standards contained in the current version of the CBC and maintaining landscaping across the project site. Considering this information, the proposed project would not disrupt or hinder implementation of any AQP control measures. Therefore, the proposed project is consistent with Criterion 3.

Summary

As analyzed above, the proposed project would be consistent with all three criteria after the implementation of adopted Specific Plan MM 3.3.3. Thus, the proposed project would not conflict with the 2017 Clean Air Plan and would be consistent with the conclusions of the previous EIR. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that development of the Specific Plan would not result in greater increases in Vehicle Miles Traveled (VMT) than the projected population increases over the planning period plan and as such would not result in operational impacts that would cumulatively considerable increase of criteria pollutants. The previous EIR analyzed potential construction impacts and determined a potentially significant impact would occur related to construction pollutants, such as fugitive dust and reactive organic gases (ROG). As a result, the previous EIR included adopted Specific Plan MM 3.3.3, which requires construction activity to demonstrate compliance with BAAQMD construction control measures and General Plan Policy OSC-J-1, that would reduce fugitive dust, nitrogen oxides (NO_x), and ROG emissions. The previous EIR determined that development in the Specific Plan would not result in operational carbon monoxide (CO) hotspots because no intersection or freeway ramp would experience more than 44,000 vehicles per hour or result in 24,000 vehicles per hour where vertical and/or horizontal mixing of pollutants and atmosphere is substantially limited (i.e., a tunnel or freeway overpass). Therefore, the previous EIR concluded that the Specific Plan would not

result in a cumulatively considerable increase in criteria pollutants with implementation of mitigation and impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

This impact is related to the cumulative effect of a proposed project's regional criteria pollutant emissions. By its nature, air pollution is largely a cumulative impact resulting from emissions generated over a large geographic region. The nonattainment status of regional pollutants is a result of past and present development within the San Francisco Bay Air Basin (Air Basin), and this regional impact is a cumulative impact. Therefore, new development projects (such as the proposed project) within the Air Basin would contribute to this impact only on a cumulative basis. No single project would be sufficient in size, by itself, to result in nonattainment of regional air quality standards. Instead, a project's emissions may be individually limited, but cumulatively considerable, when evaluated in combination with past, present, and future development projects.

Potential localized and regional impacts would result in exceedances of State or federal standards for NO_x, particulate matter (PM₁₀ and PM_{2.5}), or CO. NO_x emissions are of concern because of potential health impacts from exposure during both construction and operation and as a precursor in the formation of airborne ozone. PM₁₀ and PM_{2.5} are of particular concern during construction because of the potential to emit exhaust emissions from the operation of off-road construction equipment and fugitive dust during earth-disturbing activities (construction fugitive dust). CO emissions are of particular concern during project operation because operational CO hotspots are related to increases in on-road vehicle congestion.

ROG emissions are also important because of their participation in the formation of ground-level ozone. Ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and can cause substantial damage to vegetation and other materials. Elevated ozone concentrations result in reduced lung function, particularly during vigorous physical activity. This health problem is particularly acute in sensitive receptors such as the sick, elderly, and young children.

The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to Section 15064(h)(4) of the CEQA Guidelines,⁶ the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the proposed project's incremental effects would be cumulatively considerable. Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether the proposed project would result in regional emissions that exceed the BAAQMD regional thresholds of significance for construction and operations on a project level. The thresholds of significance represent the allowable amount of emissions each project can produce without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a proposed project that would not

⁶ California Department of Natural Resources. 2019. Website: <https://resources.ca.gov/admin/Legal/CEQA-Supplemental-Documents>. Accessed July 8, 2022.

exceed the BAAQMD thresholds of significance on the project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. Construction and operational emissions are discussed separately below.

Construction Emissions

Construction Fugitive Dust

As previously mentioned, fugitive dust (PM₁₀ and PM_{2.5}) would be generated during earthmoving activities but would largely remain localized near the project site.

The BAAQMD does not recommend a numerical threshold for fugitive dust particulate matter emissions. Instead, the BAAQMD bases the determination of significance for fugitive dust on considering the control measures to be implemented. If all appropriate emissions control measures are implemented for a project as recommended by the BAAQMD, then fugitive dust emissions during construction are not considered significant. As the proposed project would involve the disturbance of greater than 1 acre, the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) during construction activities is required in order to comply with existing regulations. The SWPPP would ensure the implementation of various dust control measures determined to be most appropriate for the project site. These measures may include, but would not be limited to, watering or seeding disturbed areas, covering stockpiles of dirt or aggregate, or other soil stabilization practices.

In addition, the BAAQMD recommends that all construction projects implement a series of mitigation measures which also include various dust control measures, such as watering disturbed areas daily and reducing vehicle speeds on unpaved roads. Adopted Specific Plan MM 3.3.3, which was included in the previous EIR, requires the same construction mitigation measures recommended by the BAAQMD to ensure that adequate dust control measures are implemented at the project site, in combination with any additional dust control measures identified and implemented by the SWPPP for the proposed project. With the implementation of adopted Specific Plan MM 3.3.3 and a SWPPP, short-term construction impacts associated with violating an air quality standard or contributing substantially to an existing or projected air quality violation would be less than significant for fugitive dust.

Construction Air Pollutant Emissions: ROG, NO_x, PM₁₀, and PM_{2.5}

The California Emissions Estimator Model (CalEEMod), Version 2020.4.0, was used to estimate the proposed project's construction emissions. CalEEMod provides a consistent platform for estimating construction and operational emissions from a wide variety of land use projects and is the model recommended by the BAAQMD for estimating project emissions. Estimated construction emissions are compared with the applicable thresholds of significance established by the BAAQMD to assess ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5} construction emissions to determine significance for this criterion.

Construction of the proposed project is expected to start in April 2023 and to conclude in August 2026. For purposes of this analysis, construction of the proposed project was assumed to correspond to these dates. If the construction schedule moves to later years, construction emissions would likely decrease because of improvements in technology and more stringent

regulatory requirements that would affect future construction equipment. The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA Guidelines.⁷

As shown in Table 3, the proposed project would be constructed in a total of 889 workdays. For a more detailed description of the construction parameters used in estimating air pollutant emissions modeling, please refer to the CalEEMod Notes Document in Appendix A.

Table 3: Preliminary Construction Schedule

Construction Activity	Phase Start Date	Phase End Date	Working Days per Week	Total Number of Working Days
Phase 0				
Demolition	4/3/2023	4/20/2023	5	14
Site Preparation	4/21/2023	4/27/2023	5	5
Grading	4/28/2023	6/8/2023	5	30
Paving/Trenching	1/4/2023	1/4/2024	5	150
Phase 1 (17 of 82 townhomes)				
Building Construction	1/5/2024	6/18/2024	5	118
Architectural Coating	6/19/2024	7/23/2024	5	25
Phase 2 (17 of 82 townhomes)				
Building Construction	7/24/2024	1/3/2025	5	118
Architectural Coating	1/4/2025	2/7/2025	5	25
Phase 3 (17 of 82 townhomes)				
Building Construction	2/8/2025	7/23/2025	5	118
Architectural Coating	7/24/2025	8/27/2025	5	25
Phase 4 (17 of 82 townhomes)				
Building Construction	8/28/2025	2/9/2026	5	118
Architectural Coating	2/10/2026	3/16/2026	5	25
Phase 5 (14 of 82 townhomes)				
Building Construction	3/17/2026	7/29/2026	5	97
Architectural Coating	7/30/2026	8/27/2026	5	21

The calculations of pollutant emissions from the construction equipment account for the type of equipment, horsepower, and load factors of the equipment, along with the duration of use. According to information provided by the project applicant, the construction of the

⁷ California Department of Natural Resources, Documents. 2019. Website: <https://resources.ca.gov/admin/Legal/CEQA-Supplemental-Documents>. Accessed July 8, 2022.

townhomes would be built in batches of 17 and then occupied by new residents immediately after. In order to demonstrate the phased overlap of construction, the construction modeling was separated into the phases shown above in Table 3.

Average daily construction emissions are compared with the BAAQMD's significance thresholds in Table 4 below.

Table 4: Construction Emissions

Construction Activity	Air Pollutants ¹ (tons/year)			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
Phase 0 (Site work for the Entire 6.93-acre Site)				
2023 Demolition	0.02	0.16	0.01	<0.01
2023 Site Preparation	0.01	0.07	<0.01	<0.01
2023 Grading	0.03	0.27	0.01	0.02
2023 Paving/Trenching	0.10	0.88	0.05	0.04
2024 Paving/Trenching	<0.01	0.02	<0.01	<0.01
Phase 1 (Construction and painting of townhomes 1-17)				
2024 Building Construction	0.04	0.36	0.02	0.02
2024 Architectural Coating	0.17	0.02	<0.01	<0.01
Phase 2 (Construction and painting of townhomes 18-34)				
2024 Building Construction	0.04	0.04	0.02	0.01
2025 Building Construction	<0.01	<0.01	<0.01	<0.01
2025 Architectural Coating	0.17	0.02	<0.01	<0.01
Phase 3 (Construction and painting of townhomes 35-51)				
2025 Building Construction	0.04	0.04	0.01	0.01
2025 Architectural Coating	0.17	0.01	<0.01	<0.01
Phase 4 (Construction and painting of townhomes 52-68)				
2025 Building Construction	0.03	0.25	0.01	0.01
2026 Building Construction	0.01	0.08	<0.01	<0.01
2026 Architectural Coating	0.17	0.01	<0.01	<0.01
Phase 5 (Construction and painting of townhomes 69-82)				
2026 Building Construction	0.03	0.27	0.01	0.01
2026 Architectural Coating	0.14	0.01	<0.01	<0.01
Entire Construction Duration (All Phases of Construction)				
Total Emissions (tons)	1.12	2.51	0.15	0.14

Construction Activity	Air Pollutants ¹ (tons/year)			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
Daily Average				
Total Emissions (lbs)	2,245.36	5,010.26	297.82	283.84
Average Daily Emissions (lbs/day) ²	2.53	5.64	0.34	0.32
Significance Threshold (lbs/day)	54	54	82	54
Exceeds Significance Threshold?	No	No	No	No
Notes: lbs = pounds NO _x = nitrogen oxides PM ₁₀ = particulate matter 10 microns or less in diameter PM _{2.5} = particulate matter 2.5 microns or less in diameter ROG = reactive organic gases ¹ Totals may not add up due to rounding. Calculations use unrounded totals. ² Calculated by dividing the total lbs of emissions by the total number of nonoverlapping working days of construction (889 workdays). Source: CalEEMod Output (see Appendix A). Values above which represent less than 0.005 are automatically rounded down and shown as <0.01.				

As shown in Table 4, the construction emissions from all construction activities are below the recommended thresholds of significance; therefore, project construction would have less than significant impact related to emissions of ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5}. As previously discussed, the proposed project would implement adopted Specific Plan MM 3.3.3 from the previous EIR for dust control to reduce potential impacts related to fugitive dust emissions during project construction. Therefore, the construction of the proposed project would have a less than significant impact.

Operational Emissions

Operational Air Pollutant Emissions: ROG, NO_x, PM₁₀, and PM_{2.5}

Operational emissions would include area, energy, and mobile sources. Area sources include emissions from architectural coatings, consumer products, and landscape equipment, while energy sources include emissions from the combustion of electricity for water and space heating. Mobile sources include exhaust and road dust emissions from the vehicles that would travel to and from the project site. Pollutants of concern include ROG, NO_x, PM₁₀, and PM_{2.5}.

Project operations were analyzed starting in 2024, the first calendar year of potential operation when new residents would occupy the first batch of townhomes. The major sources for proposed operational emissions of ROG, NO_x, PM₁₀, and PM_{2.5} include motor vehicle traffic and the occasional repainting of buildings.

The average daily and annual emissions are presented in Table 5. Operational emissions of the respective pollutants were calculated using CalEEMod, Version 2020.4.0. For detailed assumptions used to estimate emissions, see Appendix A.

Table 5: Operational Emissions

Emissions Source	Criteria Pollutants			
	ROG	NO _x	PM ₁₀ (Total)	PM _{2.5} (Total)
Annual Emissions Summary (tons/year)				
Area	0.54	0.01	<0.01	—
Energy	—	—	—	—
Mobile (Motor Vehicles)	0.31	0.41	0.50	0.14
Waste	—	—	—	—
Water	—	—	—	—
Total Project Emissions	0.85	0.42	0.50	0.14
Thresholds of Significance	10	10	15	10
Exceeds Significance Threshold?	No	No	No	No
Average Daily Emissions Summary (lbs/day)				
Project Emissions	1,700.60	836.00	1,006.96	280.00
Average Daily Project Emissions (lbs/day)¹	4.66	2.29	2.76	0.77
Thresholds of Significance	54	54	82	54
Exceeds Significance Threshold?	No	No	No	No
Notes: lbs = pounds NO _x = nitrous oxides PM ₁₀ = particulate matter 10 microns or less in diameter PM _{2.5} = particulate matter 2.5 microns or less in diameter ROG = reactive organic gases ¹ For average daily emissions, the proposed project is assumed to operate 365 days per year. Therefore, the annual tonnage of emissions is multiplied by 2,000 pounds per ton to identify total pounds of emissions and divided by 365 days per year to identify average daily emissions. Source: CalEEMod Output (see Appendix A). Values above which represent less than 0.005 are automatically rounded down and shown as <0.01.				

As shown in Table 5, the proposed project would not exceed the BAAQMD's thresholds of significance during operation, indicating that ongoing project operations would not be considered to have the potential to generate a significant quantity of air pollutants. Therefore, long-term operational impacts associated with criteria pollutant emissions generated by the proposed project would be less than significant.

Operational Carbon Monoxide Hotspot

The CO emissions from traffic generated by the proposed project are a concern at the local level. Congested intersections can result in the potential for high, localized concentrations of CO, known as a CO hotspot.

The BAAQMD recommends a screening analysis to determine whether a project has the potential to contribute to a CO hotspot. The screening criteria identify when site-specific CO dispersion modeling is necessary. The proposed project would result in a less than significant impact to air quality for local CO if all the following screening criteria are met:

- The project is consistent with an applicable Congestion Management Program (CMP) established by the County Congestion Management Agency (CMA) for designated roads or highways, regional transportation plan, and local CMA plans; and
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour; and
- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The Traffic Impact Analysis (TIA) Report prepared for the proposed project⁸ was reviewed and approved by the City of Santa Rosa Transportation and Public Works Department prior to use in this analysis. Furthermore, the proposed project would be an urban infill project that would be consistent with the Specific Plan. As a result, the proposed project would be consistent with the local CMA and associated plans.

As indicated in the TIA, no intersections impacted by the proposed project would experience traffic volumes of 44,000 or more vehicles per hour. The TIA analyzed peak-hour traffic volumes on Sebastopol Road. According to the TIA, Average Daily Traffic (ADT) and peak-hour volumes for Sebastopol Road were determined based on a 24-hour count conducted on Wednesday, May 18, 2022, while schools were in session. During the traffic count:

- Approximately 13,500 vehicles used Sebastopol Road throughout the day.
- This included 1,050 vehicles during the AM peak-hour (7:45 a.m. to 8:45 a.m.) and 1,070 vehicles during the PM peak-hour (4:00 p.m. to 5:00 p.m.).

As discussed in the TIA, the proposed project would generate 520 daily trips with 39 AM peak-hour and 47 PM peak-hour trips. As a result, the addition of the proposed project's AM peak-hour and PM peak-hour trips at Sebastopol Road would equal an estimated 1,089 AM peak-hour vehicles and 1,107 PM peak-hour vehicles, respectively. Therefore, during existing

⁸ W-Trans Transportation Consultants. 2022. Draft Transportation Study for the 851 Brittain Lane Project.

conditions, the addition of proposed project traffic volumes would not result in nearby intersections experiencing traffic volumes of 44,000 or more vehicles per hour.

Nonetheless, CO hotspots can still occur when a transportation facility's design or orientation prevents the adequate dispersion of CO emissions from vehicles, resulting in the accumulation of local CO concentrations. The design or orientation of a transportation facility that may prevent the dispersion of CO emissions include tunnels, parking garages, bridge underpasses, natural or urban canyons, below-grade roadways, or other features where vertical or horizontal atmospheric mixing is substantially limited. However, adjacent roadways that would receive new vehicle trips generated by the proposed project do not include transportation facilities where vertical or horizontal atmospheric mixing is substantially limited. For example, adjacent or nearby roadways (such as Sebastopol Road, Lombardi Lane, or Corporate Center Parkway, which are the nearby roadways that would receive vehicle trips generated by the proposed project) are all exposed surface roadways with none of the design features discussed above that could prevent atmospheric mixing.

Finally, the proposed project would not result in any significant impacts related to transportation. As discussed in further detail in Section 2.17 Transportation, all studied roadway segments and intersections would operate under applicable City and Sonoma County Transportation Authority thresholds in combination with the proposed project vehicle trips and existing traffic levels. Thus, the proposed project is considered consistent with the local CMP. Therefore, based on the above criteria, the proposed project would not exceed the CO screening criteria and would have a less than significant impact related to CO.

As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that construction of development projects in the Specific Plan area could expose sensitive receptors to substantial pollutant concentrations. However, the previous EIR found that implementation of adopted Specific Plan MM 3.3.3 and MM 3.3.5 would prevent significant impacts. The adopted Specific Plan MM 3.3.3 and MM 3.3.5 requires the preparation of a site-specific construction pollutant mitigation plan in consultation with BAAQMD staff prior to the issuance of grading permits. The previous EIR determined that implementation of adopted Specific Plan MM 3.3.6 would reduce toxic air contaminants (TACs) potential impacts to sensitive receptors by requiring site-specific analysis that would be verified by BAAQMD staff and tied to issuance of building permits on the grounds that no significant impacts would occur. Therefore, the previous EIR concluded that the Specific Plan would not expose sensitive receptors to substantial pollutant loads with implementation of adopted Specific Plan MM 3.3.3, MM 3.3.5, and MM 3.3.6 and impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The BAAQMD defines a sensitive receptor as the following: “Facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples include schools, hospitals, and residential areas.” As specified by the BAAQMD, health risk and hazard impacts should be analyzed for sensitive receptors within a 1,000-foot radius of the project site.⁹ The closest existing sensitive receptors in each direction include the following:

- Single-family residences adjacent to the site, north and east of Brittain Lane, as close as 75 feet east of the project site.
- Single-family residences located southeast of the project site approximately 775 feet away.
- Lawrence Cook Middle School, as close as 1,200 feet to the southeast of the project site.
- Bayside Church—Santa Rosa Campus (potential daycare), located adjacent to the west of the project site as close as 190 feet.

The following four criteria were applied to determine the significance of project emissions to sensitive receptors. The proposed project is considered to have a potentially significant impact if:

- **Criterion 1:** Construction of the project would result in an exceedance of the health risk significance thresholds.
- **Criterion 2:** The cumulative health impact would result in an exceedance of the cumulative health risk significance thresholds.
- **Criterion 3:** Operation of the project would result in an exceedance of the health risk significance thresholds.
- **Criterion 4:** A CO hotspot assessment demonstrates that the project would result in the development of a CO hotspot that could cause an exceedance of the CO ambient air quality standards.

Criterion 1: Project Construction Toxic Air Pollutants

An assessment was made of the potential health impacts to surrounding sensitive receptors of resulting TAC emissions during construction. A summary of the assessment is provided below, while the detailed assessment is provided Appendix A.

Diesel particulate matter (DPM) has been identified by the California Air Resources Board (ARB) as a carcinogenic substance. Major sources of DPM include off-road construction

⁹ Bay Area Air Quality Management District (BAAQMD). 2017. California Environmental Quality Act Air Quality Guidelines. Website: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed January 19, 2022.

equipment and heavy-duty delivery truck and worker activities. For purposes of this analysis, DPM is represented as exhaust emissions of PM_{2.5}.

Estimation of Construction DPM Emissions

Construction DPM emissions were estimated using CalEEMod, Version 2020.4.0, as described in the discussion for Impact 2.3(b). As presented in Table 3, the proposed project's construction is anticipated to occur from April 2023 through August 2026. Construction emissions were calculated for each construction activity, as displayed in Table 4. On-site and off-site emissions generated during project construction were modeled with a working schedule of 8 hours per day, 5 days per week.

Based on the analysis presented in this section, emissions were estimated for unmitigated project construction and mitigated project construction.

Estimation of Cancer Risks and Hazards

The BAAQMD has developed a set of guidelines for estimating cancer risks that provide adjustment factors that emphasize the increased sensitivities and susceptibility of young children to exposures to TAC.^{10,11} These adjustment factors include age-sensitivity weighting factors, age-specific daily breathing rates, and age-specific time-at-home factors. The following equations are drawn from the California Office of Environmental Health Hazard Assessment (OEHHA) Health Risk Assessment (HRA) guidelines and were adjusted with values identified for adjustment in the BAAQMD guidelines.

$$\text{Cancer Risk} = \text{CPF} \times \text{DOSE}_{\text{AIR}} \times \text{ASP} \times \text{ED/AT} \times \text{FAH} \quad (\text{EQ-1})$$

Where:

Cancer Risk = Total individual excess cancer risk defined as the cancer risk a hypothetical individual faces if exposed to carcinogenic emissions from a particular source for specified exposure durations; this risk is defined as an excess risk because it is above and beyond the background cancer risk to the population; cancer risk is expressed in terms of risk per million exposed individuals.

CPF = Inhalation Cancer Potency Factor (1.1)

ASP = Age Sensitivity Factor (see Appendix A)

ED = Exposure Duration (duration of construction activity)

AT = Averaging Time for lifetime cancer risk (70 years expressed in days)

¹⁰ Bay Area Air Quality Management District (BAAQMD). 2016. BAAQMD Air Toxics NSR Program Health Risk Assessment Guidelines. December. Website: https://www.baaqmd.gov/~media/files/planning-and-research/permit-modeling/hra_guidelines_12_7_2016_clean-pdf.pdf?la=en. Accessed April 13, 2022.

¹¹ Bay Area Air Quality Management District (BAAQMD). 2020. BAAQMD Health Risk Assessment Modeling Protocol. December. Website: https://www.baaqmd.gov/~media/files/ab617-community-health/facility-risk-reduction/documents/baaqmd_hra_modeling_protocol_august_2020-pdf.pdf?la=en. Accessed April 13, 2022.

FAH = Fraction of time-at-home (see Appendix A)

$$\text{DOSE}_{\text{AIR}} = C_{\text{AIR}} \times \text{DBR} \times A \times \text{EF} \quad (\text{EQ-2})$$

Where:

C_{AIR} = TAC concentration from air dispersion model ($\mu\text{g}/\text{m}^3$)

DBR = Daily Breathing Rate (see Appendix A)

A = Inhalation Absorption factor (1)

EF = Exposure Frequency (see Appendix A)

The BAAQMD- and OEHHA-recommended values for the various cancer risk parameters, shown in EQ-1 and EQ-2, are provided in Appendix A.

Estimation of Non-Cancer Chronic Hazards

TACs can also cause chronic (long-term) effects related to non-cancer illnesses, such as reproductive effects or birth defects, or adverse environmental effects. Non-cancer health risks are conveyed in terms of the hazard index (HI), a ratio of the predicted concentration of the facility's reported TAC emissions to a concentration considered acceptable to public health professionals. A significant risk is defined as an HI of 1 or greater. An HI of less than 1 indicates that no significant health risks are expected from the facility's TAC emissions. The relationship for the non-cancer hazards of TACs is given by the following equation:

$$\text{HI} = C_{\text{ann}}/\text{REL}$$

Where:

HI = Hazard Index: an expression of the potential for chronic non-cancer health risks

C_{ann} = Annual average TAC concentration ($\mu\text{g}/\text{m}^3$)

REL = Reference Exposure Level: the DPM concentration at which no adverse health effects are anticipated

Annual concentrations of DPM as predicted by the air dispersion model are used to estimate chronic non-cancer hazards. The OEHHA has defined a REL for DPM of $5 \mu\text{g}/\text{m}^3$.

Estimation of Health Risks and Hazards from Project Construction

To assess impacts to off-site sensitive receptors, receptor locations within the American Meteorological Society/United States Environmental Protection Agency (EPA) Regulatory Model (AERMOD) were placed at locations of existing residences and schools located in the vicinity of the project boundary. As previously discussed, project construction is anticipated to start in April 2023 and conclude in August 2026 (see Table 3:). The following AERMOD modeling parameters were utilized to identify the DPM concentration at identified receptors.

1. Sensitive receptors (e.g., schools, daycare facilities, hospitals, care facilities, residences) in the immediate project vicinity are represented in the model with discrete Cartesian receptors at a flagpole height of 1.2 meters.

The urban dispersion coefficient was used as greater than 50 percent of the surrounding three kilometers is developed.

2. Emissions were characterized in the model using area and volume sources to represent different activities. The following describes the emission sources utilized in the model for each model scenario.
 - On-site construction activities were represented using the polygon area source tool.
 - Off-site emissions from construction vehicle trips were represented with line volume sources. Off-site emissions were adjusted to account for off-site emissions that would occur within approximately 1,000 meters of the project site (see Appendix A).

Future on-site residential receptors and existing off-site sensitive receptors were considered in this analysis. Table 6 provides a summary of the scenarios that were analyzed as part of the construction HRA and includes the Maximally Impacted Sensitive Receptor (MIR) for each scenario analyzed.

Table 6: Maximally Impacted Sensitive Receptor in Each Scenario Analyzed

Scenario	MIR	Construction Duration and Phases Analyzed in Scenario
Scenario 1—Existing Off-site Receptors Exposed to all Phases of Construction	38°25'4".6"N 122°45'0".4"W An existing off-site single-family residential home located within 50 feet of the northern border of the project site	All phases of construction (Phases 0-5) 4/3/2023- 8/27/2026
Scenario 2—On-site Receptors Exposed to Half of the Emissions from Construction of Phases 1 through 5 (receptors placed in the south half of the project site)	38°25'3".2"N 122°45'0".7"W A proposed sensitive receptor in the southern half of the project site	Half of Emissions from Ground-up Construction (Phases 1-5) 1/5/2024- 8/27/2026
Scenario 3—On-site Receptors Exposed to Half of the Emissions from Construction of Phases 1 through 5 (receptors placed in the north half of the project site)	38°25'3".7"N 122°45'0".3"W A proposed sensitive receptor in the southern half of the project site	Half of Emissions from Ground-up Construction (Phases 1-5) 1/5/2024- 8/27/2026
Notes: MIR = Maximally Impacted Sensitive Receptor Source: Appendix A.		

Table 7 presents a summary of the proposed project's construction cancer risk, chronic non-cancer hazard, and annual PM_{2.5} concentration impacts at each MIR.

Table 7: Estimated Health Risks and Hazards During Project Construction—Unmitigated

Impact Scenario	Age Group	Cancer Risk (risk per million)	Chronic Non- Cancer Hazard Index ¹	Annual PM _{2.5} Concentration (µg/m ³)
Scenario 1 MIR (Existing Off-site Receptors Exposed to All Phases of Construction)	Infant	25.61	0.022	0.109
	Child	7.42	0.022	0.109
	Adult	0.98	0.022	0.109
Scenario 2 MIR (Proposed On-Site Receptors Exposed to Ground-up Construction)	Infant	12.45	0.012	0.057
	Child	4.25	0.012	0.057
	Adult	0.56	0.012	0.057
Scenario 3 MIR (Proposed On-Site Receptors Exposed to Ground-up Construction)	Infant	25.34	0.023	0.117
	Child	8.65	0.023	0.117
	Adult	1.14	0.023	0.117
Maximum in Any Scenario Analyzed		25.6	0.023	0.117
BAAQMD Thresholds of Significance		10	1	0.3
Exceeds Individual Source Threshold?		Yes	No	No
Notes: MIR = Maximally Impacted Receptor ¹ Chronic non-cancer hazard index was estimated by dividing the annual diesel particulate matter (DPM) concentration (as PM _{2.5} exhaust) by the Reference Exposure Level (REL) of 5 µg/m ³ . Source: Appendix A.				

As shown in Table 7, health risks associated with the proposed project's construction DPM emissions would not exceed the BAAQMD's chronic non-cancer hazard index or annual PM_{2.5} thresholds of significance at in any scenario analyzed. However, the DPM concentration during construction of the proposed project would cause an exceedance the applicable cancer risk significance threshold at the MIR in the infant scenarios under Scenario 1 and Scenario 3. Therefore, to comply with adopted Specific Plan MM 3.3.5, the proposed project must comply with a construction pollutant mitigation plan that would reduce the cancer risk impact during the construction period.

As written, adopted Specific Plan MM 3.3.5 states, “. . . If BAAQMD risk thresholds (i.e., probability of contracting cancer is greater than 10 in one million) would be exceeded, mitigation measures shall be identified in the construction pollutant mitigation plan to address potential impacts and shall be based on site-specific information, such as the distance to the nearest sensitive receptors, project site plan details, and construction schedule . . . Construction pollutant mitigation plan measures shall include but not be limited to limiting the amount of acreage to be graded in a single day, requiring the use of advanced particulate filters on construction equipment, and requiring the use of alternative fuels, such as biodiesel, to power construction equipment.”

To implement the adopted Specific Plan MM 3.3.5, this addendum includes clarification of the mitigation measure that would be included in the construction pollutant mitigation plan under Implementation Measure (IM) AIR-1. IM AIR-1 requires the project applicant and/or construction contractor to provide documentation to the City of Santa Rosa that all off-road diesel-powered construction equipment greater than 50 horsepower meets EPA or ARB Tier IV Final off-road emissions standards or otherwise results in emissions less than the BAAQMD threshold, for example, by use of a mix of Tier 4 Final equipment and other equipment, including alternative powered vehicles.

As a result, the inclusion of IM AIR-1 would be consistent with the Specific Plan and adopted Specific Plan MM 3.3.5 because it would ensure that the proposed project not exceed BAAQMD risk thresholds, specifically cancer risk during construction for sensitive receptors. The use of Tier IV Final off-road equipment would be exactly what adopted Specific Plan MM 3.3.5 describes as a “mitigation plan measure” because Tier IV equipment includes engines that emit fewer pollutants and thus result in reduced cancer risk to sensitive receptors. Thus, because IM AIR-1 implements adopted Specific Plan MM 3.3.5, the proposed project does not have a new or substantially more severe impact than evaluated in the previous EIR.

Table 8 shows the health risks and non-cancer hazard index for construction with implementation of Tier IV Final mitigation, as one option of the construction pollutant mitigation plan required by IM AIR-1.

Table 8: Estimated Health Risks and Hazards During Project Construction—Mitigated

Impact Scenario	Age Group	Cancer Risk (risk per million)	Chronic Non- Cancer Hazard Index ¹	Annual PM _{2.5} Concentration (µg/m ³)
Scenario 1 MIR (Existing Off-site Receptors Exposed to All Phases of Construction)	Infant	2.03	0.002	0.009
	Child	0.59	0.002	0.009
	Adult	0.08	0.002	0.009
Scenario 2 MIR (Proposed On-Site Receptors Exposed to Ground-up Construction)	Infant	1.30	0.001	0.006
	Child	0.44	0.001	0.006
	Adult	0.06	0.001	0.006
Scenario 3 MIR (Proposed On-Site Receptors Exposed to Ground-up Construction)	Infant	2.05	0.002	0.009
	Child	0.70	0.002	0.009
	Adult	0.09	0.002	0.009
Maximum in Any Scenario Analyzed		2.05	0.002	0.009
BAAQMD Thresholds of Significance		10	1	0.3
Exceeds Individual Source Threshold?		No	No	No
Notes: µg/m ³ = micrograms per cubic meter BAAQMD = Bay Area Air Quality Management District MIR = Maximally Impacted Sensitive Receptor PM _{2.5} = particulate matter 2.5 microns or less in diameter				

Impact Scenario	Age Group	Cancer Risk (risk per million)	Chronic Non- Cancer Hazard Index ¹	Annual PM _{2.5} Concentration (µg/m ³)
¹ Chronic non-cancer hazard index was estimated by dividing the annual DPM concentration (as PM _{2.5} exhaust) by the Reference Exposure Level (REL) of 5 µg/m ³ . Source: Appendix A.				

As noted in Table 8, the proposed project's construction-related health risks would not exceed any applicable BAAQMD significance threshold after the incorporation of IM AIR-1; therefore, project-related emissions would not result in significant health impacts to nearby sensitive receptors during construction.

Criterion 2: Cumulative Health Risk Assessment

The BAAQMD recommends assessing the potential cumulative impacts from sources of TACs within 1,000 feet of a project. For a project-level analysis, the BAAQMD provides several tools for use in screening potential sources of TACs. The BAAQMD-provided tools used to assess the potential cumulative impacts from TACs are described below:

- Health Risks for Local Roadways.** The BAAQMD pre-calculated concentrations and the associated potential cancer risks and PM_{2.5} concentration increases for each county within their jurisdiction for roadways that carry at least 30,000 average daily trips. For Community Air Risk Evaluation (CARE) Program areas, the BAAQMD also includes local roadways that meet BAAQMD's "major roadway" criteria of 10,000 vehicles or 1,000 trucks per day. The latest available screening tool is in the form of a Geographic Information System (GIS) raster file. As the proposed project is not located in a CARE area,¹² the BAAQMD-screening tool does not include local roadways that meet BAAQMD's "major roadway" criteria for the project area. Therefore, traffic volumes were retrieved for roadways within 1,000 feet of the project site experiencing between 10,000 and 30,000 daily vehicle trips and calculated for their associated health risks. Those results are added to and shown in Table 9.
- Freeway Screening Analysis Tool.** The BAAQMD prepared a GIS tool that contains pre-estimated cancer risk and PM_{2.5} concentration increases for highways within the Bay Area. The nearest freeways to the proposed project include SR-12, approximately 200 feet north of the project site.
- Stationary Source Risk and Hazard Screening Tools.** The BAAQMD prepared a GIS tool with the location of permitted sources and provides a health risk calculator that estimates and refines screen-level cancer risk, a non-cancer health hazard index, and PM_{2.5} concentrations using emissions data from BAAQMD's permitting database.¹³ For each

¹² Bay Area Air Quality Management District (BAAQMD). 2014. Community Air Risk Evaluation Program. Website: <https://www.baaqmd.gov/community-health/community-health-protection-program/community-air-risk-evaluation-care-program>. Accessed June 24, 2022.

¹³ Bay Area Air Quality Management District (BAAQMD). 2022. Permitted Stationary Sources Risk and Hazards. Website: <https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=2387ae674013413f987b1071715daa65>. Accessed June 24, 2022.

emissions source, the BAAQMD provides conservative estimates of cancer risk and PM_{2.5} concentrations. Based on information from the GIS tool, three BAAQMD-permitted stationary sources exist within the vicinity of 1,000 feet of the project site.

- **Rail Screening Tools.** The BAAQMD prepared GIS tools that contain estimated cancer risks and PM_{2.5} concentrations from railroad operations at any point within the Air Basin. No railways are within 1,000 feet of the project site.

Cumulative Health Risk Assessments

A cumulative HRA was performed that examined the cumulative impacts of the proposed project's construction emissions and sources of TAC emissions within 1,000 feet of the project site. The analysis was performed for the off-site MIR and on-site MIR, and the highest values are presented below.

The cumulative health risk results, including health risks from the existing stationary source, are summarized during project construction in Table 9. Cumulative health risk results shown therein are representative of the health risks to the MIR that would experience the highest concentration of pollutants.

Table 9: Summary of the Cumulative Health Impacts at the Off-site MIR During Construction

Source/Impact Scenario	Source Type	Distance from the Project Site (feet)	Cancer Risk (per million)	Chronic HI	PM _{2.5} Concentration (µg/m ³)
Project MIR					
Project Construction (Unmitigated)	Diesel Construction Equipment	—	25.6	0.023	0.117
Project Construction (Mitigated)	Diesel Construction Equipment	—	2.05	0.002	0.009
Existing Stationary Sources (BAAQMD Facility Number)¹					
Selvage Concrete Products, Inc. (ID 18850)	Manufacturing, non-metal product	650	No Data	0.032	No Data
Leisure Mobile Home Park (ID 20958)	Accommodation and Food Services, RV park	550	0.018	0.00	0.001
Guanella Auto Body	Other Services (except Public Administration), automotive repair and maintenance	400	No Data	0.001	No Data
Major Roadways					
Existing Local Roadway Network		—	0.2409	No Data	0.0039
Rail					

Source/Impact Scenario	Source Type	Distance from the Project Site (feet)	Cancer Risk (per million)	Chronic HI	PM _{2.5} Concentration (µg/m ³)
Existing Rail in the Air Basin		>1,000	0.1233	No Data	0.0002
Highways/Freeways					
Existing Freeways (Highway 12)		300	9.919	No Data	0.1955
Cumulative Health Risks					
Cumulative Maximum with Project DPM Emissions (Unmitigated)			35.91	0.056	0.317
Cumulative Maximum with Project DPM Emissions (Mitigated)			12.35	0.035	0.210
BAAQMD's Cumulative Thresholds of Significance			100	10	0.8
Threshold Exceeded in Either Scenario?			No	No	No
Notes: HI = Hazard Index MIR = Maximally Impacted Receptor No Data = no data available µg/m ³ = micrograms per cubic met ¹ Assumes emissions remain constant with time. Source: Appendix A.					

As noted in Table 9, the cumulative impacts from the project construction and existing sources of TACs would be less than the BAAQMD's cumulative thresholds of significance. Thus, the cumulative health risk impacts from project construction and cumulative impacts at the project site during operations would be less than significant.

Criterion 3: Operational Emissions

The proposed project would result in the development and operation of 82 townhomes. As previously discussed in Impact 2.3(b), the proposed project would not result in a potential CO hotspot. As discussed in the TIA, the proposed project would generate 520 daily trips with 39 AM peak-hour and 47 PM peak-hour trips. As a result, the addition of the proposed project's AM peak-hour and PM peak-hour trips at Sebastopol Road would equal an estimated 1,089 AM peak-hour vehicles and 1,107 PM peak-hour vehicles, respectively. As a residential development, it is anticipated that the proposed project would not generate noticeable heavy-duty vehicle trips.

Because the proposed project would generate 520 daily passenger vehicle trips and nearly all passenger vehicles are gasoline-fueled, the proposed project would not generate a significant amount of DPM emissions during operation; however, gasoline-fueled vehicles would still emit relatively small amounts of gasoline TACs such as benzene, isopentane, and toluene during project operation. Nonetheless, the potential cancer risks associated with non-diesel TACs emitted from gasoline vehicles in the Air Basin are substantially less than the potential cancer

risks associated with DPM emissions¹⁴ and are therefore not included in this analysis. Furthermore, these emissions would be dispersed throughout the local roadway network and would not solely be generated at the project site. Thus, the proposed project would not result in significant health impacts to nearby sensitive receptors during operation.

Criterion 4: Carbon Monoxide Hotspot Assessment

As discussed in Impact 2.3(b), the proposed project would not generate sufficient vehicle traffic volumes during project operation to substantiate creating a CO hotspot. Therefore, this impact would be less than significant with regard to exposing sensitive receptors to substantial concentrations of CO emissions. As such, the proposed project would result in less than significant impacts related to exposing sensitive receptors to substantial pollutant concentrations.

Summary

As described above, the proposed project would not expose sensitive receptors to substantial pollutant concentrations during either construction or operations within incorporation of mitigation. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation

The previous EIR determined that no odor complaints had been received for any odor generators within the Specific Plan area and that future construction would generate temporary odor impacts that would not be significant. In addition, the previous EIR found that new sensitive receptors in the Specific Plan area would not be exposed to existing odor generators because they would not include uses that generate significant amounts of odors, such as a wastewater treatment plant or asphalt batch plant. Therefore, the previous EIR concluded that the Specific Plan would not expose receptors to significant amounts of odors or generate significant amounts of odors and impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

As stated in the BAAQMD 2017 Air Quality Guidelines, odors are generally regarded as an annoyance rather than a health hazard.¹⁵ The ability to detect odors varies considerably among the populations and is subjective. The BAAQMD does not have a recommended odor threshold for construction activities. However, the BAAQMD recommends operational screening criteria that are based on the distance between receptors and types of sources known to generate odors. For projects within the screening distances, the BAAQMD has the following threshold for project operations:

¹⁴ California Air Resources Board (ARB). 2008. Health Risk Assessment for the Union Pacific Railroad Oakland Railyard. Website: https://ww2.arb.ca.gov/sites/default/files/classic/railyard/hra/up_oak_hra.pdf?_ga=2.229617876.913681903.1594937953-503090677.1594937953. Accessed March 8, 2022.

¹⁵ BAAQMD. 2017. Website: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed June 22, 2022

An odor source with five or more confirmed complaints per year averaged over 3 years is considered to have a significant impact on receptors within the screening distance shown in Table 3-3 [of the BAAQMD's guidance].

Two circumstances have the potential to cause odor impacts:

1. A source of odors is proposed to be located near existing or planned sensitive receptors, or
2. A sensitive receptor land use is proposed near an existing or planned source of odor.

Projects that would site an odor source or a receptor farther than the applicable screening distance, shown in Table 10 below, would not likely result in a significant odor impact.

Table 10: Odor Screening Distances

Land Use/Type of Operation	Project Screening Distance
Wastewater Treatment Plant	2 miles
Wastewater Pumping Facilities	1 mile
Sanitary Landfill	2 miles
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	2 miles
Chemical Manufacturing	2 miles
Fiberglass Manufacturing	1 mile
Painting/Coating Operations	1 mile
Rendering Plant	2 miles
Coffee Roaster	1 mile
Food Processing Facility	1 mile
Confined Animal Facility/Feed Lot/Dairy	1 mile
Green Waste and Recycling Operations	1 mile
Source: Bay Area Air Quality Management District (BAAQMD). 2017. Final 2017 Clean Air Plan. April 19. Website: https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en . Accessed March 8, 2022.	

The BAAQMD also identifies that the presence of an odor impact is dependent on a number of variables including:

- Nature of the odor source (e.g., wastewater treatment plant, food processing plant);
- Frequency of odor generation (e.g., daily, seasonal, activity-specific);
- Intensity of odor (e.g., concentration);

- Distance of odor source to sensitive receptors (e.g., miles);
- Wind direction (e.g., upwind or downwind); and
- Sensitivity of the receptor.

Project Construction

Diesel exhaust and ROG¹⁶s, which are objectionable to some, would be emitted during construction of the proposed project; however, emissions would disperse rapidly from the project site and would be short-term and intermittent in duration and frequency. Therefore, project construction would not generate objectionable odors affecting a substantial number of people. As such, construction odor impacts would be less than significant.

Project Operation

Project as an Odor Receptor

Land uses typically associated with generating substantial odors include wastewater treatment facilities, waste disposal facilities, agricultural operations, or other operations listed previously in Table 10. Using Google Maps, one automobile body shop, one coffee shop, and one asphalt batch plant were identified within the associated screening distances. Public records retrieved from the BAAQMD show that 41 unconfirmed odor complaints and three confirmed (all in 2018) were filed for the BoDean Company between 2017 and 2022 (odor complaint history records included in Appendix A). The BoDean Company is located at 1060 Maxwell Drive, which is approximately 1.75 miles to the northeast of the project site and is considered an asphalt batch plant. The site at 1060 Maxwell Drive operates during normal business hours from 8:00 a.m. to 5:00 p.m.

The number of confirmed complaints (3) for this facility is below the BAAQMD's threshold (5 averaged per year), as mentioned above. In addition, the project site is located 1.75 miles southwest of 1060 Maxwell Drive and the intervening topography includes fully developed urban land uses, such as residential subdivisions, landscaping, Santa Rosa Creek, and Highway 12, which would limit the spread of odors to the site. Furthermore, the predominant wind direction in Santa Rosa is from the northwest and trending toward the southeast as prevailing winds follow the axis of the valley, northwest/southeast. The Sonoma Valley prevailing winds can transport local and nonlocally generated pollutants northward into the narrow valley, which often traps and concentrates the pollutants under stable conditions.¹⁶ Therefore, due to the primary wind direction to the southeast and northward, the project site's location is upwind of the odor source. As a result, the proposed project as a receptor during operation would not experience peculiar odor impacts from nearby sources due to prevailing wind direction and distance from the odor source.

Project as an Odor Generator

The proposed project would construct 82 new townhomes, whose operations could lead to odors from associated residential laundry cleaning, vehicle exhaust, outdoor cooking, and waste disposal. However, such odors generated by project operation would be small in

¹⁶ Bay Area Air Quality Management District (BAAQMD). CEQA Guidelines May 2017, page C-11. Accessed June 14, 2022

quantity and duration and would not pose an objectionable odor impact to future and existing receptors.

To summarize, the proposed project as a source or receptor would not generate any peculiar emissions nor odors that adversely affect a substantial number of people. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

The following approved mitigation measures are required for all development projects within the Specific Plan planning area, which includes the proposed project. MM 3.3.6 would not be applicable to the proposed project because the project would not result in the construction of residences within 1,000 feet of emissions sources such as the US 101.

MM 3.3.3 Where projects in the project area are subject to subsequent CEQA review, the City of Santa Rosa must ensure that in addition to the BAAQMD basic construction mitigation measures from Table 8-1 of the BAAQMD CEQA Air Quality Guidelines (or subsequent updates), BAAQMD additional mitigation measures from Table 8-2 of the BAAQMD CEQA Air Quality Guidelines (or subsequent updates) are noted on the construction documents and implemented. These measures include the following:

1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.
2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6-to-12-inch compacted layer of wood chips, mulch, or gravel.
8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than 1 percent.

9. Minimizing the idling time of diesel-powered construction equipment to two minutes.
10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet average 20 percent NO_x reduction and 45 percent PM reduction compared to the most recent ARB fleet average.
11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).
12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NO_x and PM.
13. Requiring all contractors use equipment that meets ARB's most recent certification standard for off-road heavy-duty diesel engines.

MM 3.3.5 Projects within the project area that have a construction area greater than 5 acres, and which are scheduled to last more than two years shall be required to prepare a site-specific construction pollutant mitigation plan in consultation with Bay Area Air Quality Management District (BAAQMD) staff prior to the issuance of grading permits. A project-specific construction-related dispersion model acceptable to the BAAQMD shall be used to identify potential toxic air contaminant impacts, including diesel particulate matter (DPM). If BAAQMD risk thresholds (i.e., probability of contracting cancer is greater than 10 in one million) would be exceeded, mitigation measures shall be identified in the construction pollutant mitigation plan to address potential impacts and shall be based on site-specific information, such as the distance to the nearest sensitive receptors, project site plan details, and construction schedule. The City shall ensure construction contracts include all identified measures. Construction pollutant mitigation plan measures shall include but not be limited to limiting the amount of acreage to be graded in a single day, requiring the use of advanced particulate filters on construction equipment, and requiring the use of alternative fuels, such as biodiesel, to power construction equipment.

MM 3.3.6 *Not applicable to the proposed project.*

The following measures shall be utilized in site planning and building designs to reduce TAC and PM_{2.5} exposure where new receptors are located within 1,000 feet of emissions sources:

- Future development in the project area that includes sensitive receptors (such as residences, schools, hospitals, daycare centers, or retirement homes) located within 1,000 feet of US 101 and/or stationary sources shall require site-specific analysis to determine the level of health risk. This analysis shall be conducted following procedures outlined by the BAAQMD. If the site-specific analysis reveals significant exposures from all sources (i.e., health risk in terms of excess cancer

risk greater than 100 in one million, acute or chronic hazards with a hazard Index greater than 10, or annual PM_{2.5} exposures greater than 0.8 µg/m³), measures shall be employed to reduce the risk to below the threshold (e.g., electrostatic filtering systems or equivalent systems and location of vents away from TAC sources).

- Future nonresidential developments projected to generate more than 100 heavy-duty truck trips daily and/or include the need for a BAAQMD permit to operate a stationary source shall include measures to protect public health to ensure they do not cause a significant health risk in terms of excess cancer risk greater than 10 in one million, acute or chronic hazards with a Hazard Index greater than 1.0, or annual PM_{2.5} exposures greater than 0.3 µg/m³.

The following implementation measure (IM) is included to implement adopted Specific Plan MM 3.3.5, which reduces the proposed project's potential to expose sensitive receptors to substantial levels of elevated TACs during the construction period.

IM AIR-1

To implement Specific Plan Mitigation Measure (MM) 3.3.5, prior to the issuance of any demolition, grading, or building permits (whichever occurs earliest), the applicant shall submit a construction pollutant mitigation plan to the City of Santa Rosa Building Division that demonstrates that the proposed project would meet the Bay Area Air Quality Management District's (BAAQMD) cancer risk threshold by one of the following two methods during all phases of construction:

- Demonstrates that all off-road equipment with engines greater than 50 horsepower would have Tier 4 Final engines.
- Alternatively, the project applicant may demonstrate that the project would meet the BAAQMD cancer-risk threshold by a combination of measures, such as use of California Air Resources Board (ARB)-certified Level 3 diesel particulate filters, alternatively fueled equipment (i.e., non-diesel), or use of added exhaust muffling and filtering devices. If any measures other than use of Tier 4 Final diesel engines are proposed, the project applicant shall submit a signed letter by a qualified air quality specialist that verifies that the equipment included in the plan meets the BAAQMD cancer risk threshold.

As part of the construction pollutant mitigation plan, the applicant shall include construction equipment lists of off-road equipment descriptions and information. Off-road equipment descriptions and information shall include, but are not limited to, equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, and engine serial number. Construction permits will not be issued until the City has confirmed that the emissions of the construction equipment in the construction pollutant mitigation plan would not exceed the BAAQMD cancer risk threshold.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to air quality. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
IV. Biological Resources <i>Would the project:</i>					
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 United States Fish and Wildlife Service?	Less than significant impact with mitigation incorporated.	No	No	No	MM 3.4.1a; MM 3.4.1b
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service?	Less than significant impact.	No	No	No	None
c) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than significant impact with mitigation incorporated.	No	No	No	MM 3.4.1a; MM 3.4.2b

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
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 wildlife nursery sites?	Less than significant impact.	No	No	No	None
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No impact.	No	No	No	None
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?	No impact.	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that, without mitigation, buildout could result in adverse effects, either directly or indirectly, on species listed as endangered, threatened, rare, proposed, and candidate plant and wildlife species as well as plant species identified by the California Native Plant Society (CNPS) with a rating of List 1A or 1B. The previous EIR set forth MM 3.4.1a which requires implementation of General Plan MM 4.F-5, which requires implementation of all requirements of the Santa Rosa Plain Conservation Strategy (Conservation Strategy), including mitigation for loss of habitat. The previous EIR also requires implementation of MM 3.4.1b, which requires surveys for and protection of active bird nests and bat roosts. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The following analysis is based on the Biological Resource Analysis (BRA) prepared for the proposed project by Johnson Marigot Consulting, LLC (JMC), dated June 2022 (Appendix B).¹⁷ Two earlier versions of the BRA, prepared by JMC and dated April 2022 and May 2022, were peer-reviewed by FirstCarbon Solutions (FCS), and FCS identified information and analysis that would need to be added. Additional revisions were made to the BRA on July 14, 2022, to reflect impacts to a wetland swale related to the proposed widening of Sebastopol Road along the frontage of the property. The following discussion reflects the updated BRA.

Special-status Wildlife Species

According to the BRA, Section 4.4.2 *Special-Status Wildlife with Suitable Habitat and/or Potential to Occur on the Project Site*, there are five regionally known special-status wildlife species that have the potential to occur on the project site, namely California tiger salamander (*Ambystoma californiense*), white-tailed kite (*Elanus leucurus*), pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and western red bat (*Lasiurus blossevillii*).

Per the BRA, potential impacts on the California tiger salamander include the loss of approximately 5.5 acres of suitable upland over-summering and/or upland dispersal habitat available on the project site. Per the BRA, California tiger salamander individuals are not expected to occur on-site due to the lack of connectivity between the project site and extant California tiger salamander populations as a result of intervening barriers such as the heavily trafficked Sebastopol Road and existing development surrounding the site. The previous EIR includes MM 3.4.1a, which requires the implementation of Avoidance and Minimization Measures and compensatory mitigation prescribed within the Conservation Strategy and the United States Fish and Wildlife Service (USFWS) Programmatic Biological Opinion. Pursuant to the previous EIR, the proposed project would be required to implement adopted Specific Plan MM 3.4.1a to minimize potential adverse effects on the California tiger salamander through the implementation of Avoidance and Minimization Measures during the construction phase of the project, the establishment and effective management of preserves to maintain genetic diversity and provide suitable habitat for California tiger salamander, securing and expanding breeding sites, and implementation of minimum mitigation ratios for impacted resources.

While the BRA does not specify the expected minimum mitigation ratios, it states that the closest known breeding record for the California tiger salamander is approximately 1,000 feet from the project site, which would indicate a 2:1 ratio (mitigated: impacted) per the Conservation Strategy ratios cited by BRA in Table 1. The ultimate mitigation ratios will be identified and imposed as part of the permitting process.

As part of site preparation activities, the entire project site (with the exception of locations where trees are to be protected in-place) would be graded and compacted and on-site shrubs and trees and structures would be removed, potentially resulting in permanent impacts to nesting bird and roosting bats, including special-status birds or bats, if present. Active bird

¹⁷ Johnson Marigot Consulting, LLC. 2022, Biological Resource Analysis, Brittain Lane Residential Project. Accessed June 3, 2022.

nests or roosts may be affected by project-related activities that result in premature nest or roost abandonment or destruction.

Implementation of the previous EIR's adopted MM 3.4.1b, which requires pre-construction nesting bird and roosting bat surveys as well as active bird nest and bat protection, would minimize potential for adverse effects on nesting birds and roosting bats.

Critical Habitat

Per the BRA, project implementation would result in the conversion of a total of approximately 6.2 acres of land within federally designated critical California tiger salamander habitat into residential development. However, as described above, implementation of the previous EIR's adopted MM 3.4.1a would minimize potential for adverse effects on designated critical habitat. Accordingly, while project implementation could result in impacts to designated critical habitat, these impacts would be reduced to a level considered less than significant pursuant to CEQA and would not exceed the severity of impacts previously evaluated and disclosed in the previous EIR.

Special-status Plant Species Covered Under the Conservation Strategy

The BRA states that the seasonal wetland on-site provides marginal habitat for the federally listed, State listed, and regional species of concern covered under the Conservation Strategy, namely Sonoma sunshine (*Blennosperma bakeri*), Burke's goldfields (*Lasthenia burkei*), and Sebastopol meadowfoam (*Limnanthes vinculans*) (collectively referred to as the federally listed plant species).

Presence/absence of the federally listed plant species can be established by conducting surveys and reporting the survey results following the protocol of the Conservation Strategy, Appendix D, *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain*. According to Section 3.1.3 *Rare Plant Surveys* of the BRA, JMC personnel conducted protocol-level rare plant surveys for special-status plant species within all suitable habitats on the project site on March 10, April 13, and May 31, 2022, and July 26, 2022. No special-status plant species were reported as being present on the project site per the JMC BRA, however protocol rare plant surveys are ongoing and have yet to be completed.

However, implementation of the previous EIR's adopted MM 3.4.1a would reduce potential adverse effects on federally listed plants to a less than significant level through the establishment and effective management of preserves to maintain genetic diversity of listed plants and the requirement to implement minimum mitigation ratios for any impacted resources, with the ultimate mitigation ratios identified and imposed as part of the permitting process.

Special-status Plant Species Not Covered Under the Conservation Strategy

In addition to the federally listed plant species discussed above, the BRA also identifies 29 rare plant species (or listed as special-status under State regulations) with a potential to occur on-site, as provided in Table A of the BRA. None of these species are covered under the Conservation Strategy. According to Section 3.1.3 *Rare Plant Surveys* of the BRA, JMC

personnel conducted protocol-level rare plant surveys for special-status plant species within all suitable habitats on the project site on March 10, April 13, and May 31, 2022, and July 26, 2022. No special-status plants were reported as being present on the project site per the JMC BRA; however, protocol rare plant surveys are ongoing and have yet to be completed.

While project implementation could result in impacts on species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or USFWS, either directly or through habitat modifications, according to the previous EIR, these impacts would be reduced to a level considered less than significant under CEQA with implementation of previous EIR adopted MM 3.4.1.a and 3.4.1.b, and would not exceed the severity of impacts previously evaluated and disclosed in the previous EIR. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not result in adverse impacts on sensitive natural communities or riparian habitat because compliance with General Plan policies that pertain to protecting these resources would ensure that they are not adversely impacted. Therefore, the previous EIR states that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The BRA identifies a 0.005-acre seasonal wetland and a 0.012-acre seasonal wetland swale on-site, which would be considered sensitive communities by CDFW. Since the seasonal wetlands are proposed to be filled, the project could result in a potential impact on the seasonal wetland communities of these wetlands. Any potential impacts on potentially present sensitive communities would be mitigated for concurrently with the wetland mitigation measures specified under c), below.

While project implementation could result substantial adverse effect on the sensitive natural communities identified in local or regional plans, policies, and regulations or by the CDFW or USFWS, these impacts would be reduced to a level considered less than significant under CEQA with implementation of MM 3.4.2b and would not exceed those potential impacts that were evaluated and disclosed in the previous EIR. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout may result in adverse impacts on wetlands. The EIR set forth MM 3.4.2b, which require mitigation for loss of these resources. The previous EIR concluded that implementation of these mitigation measures, if required, would reduce any potential impacts to less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

As discussed in response b) sensitive natural communities, the project site supports approximately 0.017 acres of potentially jurisdictional waters of the United States and waters of the State under the jurisdiction of the United States Army Corps of Engineers (USACE) pursuant to the Clean Water Act (CWA) (Section 404) and under the jurisdiction of the California State Water Resources Quality Control Board (State Water Board) pursuant to the CWA (Section 401) and the Porter Cologne Water Quality Control Act, i.e., federally and State protected wetlands.

Project implementation would require fill of the seasonal wetland, which would result in the loss of 0.017 acres of this habitat type. Implementation of the previous EIR adopted MM 3.4.2b would require a formal wetland delineation, which has been conducted and submitted to USACE, as well as impact avoidance, impact minimization, and/or compensatory mitigation for impacts to waters of the United States to ensure no net loss of wetlands.

Accordingly, while project implementation would result in impacts to waters of the United States, these impacts would be reduced to a level considered less than significant pursuant to CEQA and do not exceed those considered in the previous EIR. No additional analysis is required.

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout could interfere with movement of native resident or migratory fish or wildlife species or established migratory corridors. The previous EIR states that implementation of the goals and policies of the General Plan and the Citywide Creek Master Plan would reduce potential impacts and enhance wildlife corridors in the project area such that the resulting impacts would be less than significant.

The previous EIR addressed potential impacts related to impeding established nursery sites in the Special-status Species section (Impact 3.4.1; pages 3.4-26 *et seq.*), concluding that with implementation of adopted Specific Plan MM 3.4.1b, impacts to nursery sites would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

Per the BRA, the project site does not “act as a wildlife corridor” and project implementation would therefore not result in impacts to wildlife corridors.

The project site provides potential habitat for nesting birds and maternity bat roosts. However, with implementation of adopted Specific Plan MM 3.4.1b, including protection of active bird nests and bat roosts, impacts to these resources would be considered less than significant. Accordingly, this potential impact does not exceed those considered in the previous EIR. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

e) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that that buildout would not conflict with local policies and City Code provisions because new development would be required to comply with them. Therefore, the previous EIR concluded that no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

If the project complies with all local policies (including implementation of the Conversation Strategy), as well as City Code provisions including the City's Tree Ordinance, no conflict or impact would occur.

An arborist survey was conducted on the project site by Horticultural Associates in April 2022 (Appendix B of the BRA). A total of 21 trees with a diameter of 6-inches or greater were identified on-site. Per the City's Tree Ordinance, the on-site oaks and redwood (*Sequoia sempervirens*) trees would be considered "heritage trees." Project implementation would require removal of seven valley oak, two redwood, one cottonwood, and three ornamental trees. As the project is required to comply with the Santa Rosa City Code, which includes the Tree Ordinance, implementation of the project would not result in a conflict with the Tree Ordinance. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

f) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved Habitat Conservation Plan. Santa Rosa has not adopted a conservation plan nor is it signatory to a plan. However, as described above, the City has adopted General Plan 2035 MM 4.F-5, which requires development projects to be conditioned to incorporate avoidance and mitigation measures in the Santa Rosa Plain Conservation Strategy (Conservation Strategy) and USFWS Programmatic Biological Opinion for covered species. Adopted Specific Plan MM 3.4.1a identified in Impact 3.4.1 requires implementation of MM 4.F-5 of the General Plan EIR. Therefore, the previous EIR concluded that there will be no impact.

851 Brittain Lane Subdivision Project Analysis and Conclusions

No changes to the conclusion of the previous EIR are applicable to the proposed project. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

The following approved mitigation measures are required for all development projects within the Specific Plan planning area, which includes the proposed project.

- MM 3.4.1a** Implement General Plan Mitigation Measure 4.F-5: The City of Santa Rosa shall incorporate the avoidance and mitigation measures described in the Santa Rosa Plain Conservation Strategy and the USFWS Programmatic Biological Opinion, as conditions of approval for development in or near areas with suitable habitat for California tiger salamander, Burke's goldfields, Sonoma sunshine, Sebastopol meadowfoam, and many-flowered navarretia. However, in accordance with the USFWS Programmatic Biological Opinion, projects within the Southwest Santa Rosa Preserve System will be evaluated individually and mitigation may not necessarily adhere to the ratios described in the Conservation Strategy.
- MM 3.4.1b** If there is the potential for destruction of a nest or substantial disturbance to nesting birds or bats due to construction activities, a plan to monitor nesting birds or bats during construction shall be prepared and submitted to the USFWS and CDFG for review and approval. The City shall comply with all USFWS or CDFG guidance for protection of nesting birds. If vegetation, buildings, or bridges that potentially provide nesting sites must be removed, a qualified wildlife biologist shall conduct pre-construction surveys. If an active bird nest is found, the bird shall be identified as to species and the approximate distance from the closest work site to the nest estimated. No additional measures need be implemented if active nests are more than the following distances from the nearest work site: (a) 300 feet for raptors; or (b) 75 feet for other non-special-status bird species. Disturbance of active nests shall be avoided to the extent possible until it is determined that nesting is complete, and the young have fledged. Bats shall be absent or flushed from roost locations prior to demolition of buildings. If flushing of bats from buildings is necessary, it shall be done by a qualified biologist during the nonbreeding season from October 1 to March 31. When flushing bats, structures shall be moved carefully to avoid harming individuals, and torpid bats given time to completely arouse and fly away. During the maternity season from April 1 to September 30, prior to building demolition or construction, a qualified biologist shall determine if a bat nursery is present at any sites identified as potentially housing bats. If an active nursery is present, disturbance of bats shall be avoided until the biologist determines that breeding is complete, and young are reared.
- MM 3.4.2b** A formal wetland delineation shall be conducted for areas that will be permanently or temporarily impacted by the project. If jurisdictional waters cannot be avoided, the City shall apply for a CWA Section 404 permit from the USACE and a Section 401 permit from the Regional Water Quality Control Board (RWQCB). These permits shall be obtained prior to issuance of grading permits and implementation of the proposed project.
- The City shall ensure that the project will result in no net loss of waters of the U.S. by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact, as determined in the CWA Section 404/401 permits.

Compensatory mitigation may consist of (a) obtaining credits from a mitigation bank; (b) making a payment to an in lieu fee program that will conduct wetland, stream, or other aquatic resource restoration, creation, enhancement, or preservation activities (these programs are generally administered by government agencies or nonprofit organizations that have established an agreement with the regulatory agencies to use in lieu fee payments collected from permit applicants); and/or (c) providing compensatory mitigation through an aquatic resource restoration, establishment, enhancement, and/or preservation activity. This last type of compensatory mitigation may be provided at or adjacent to the impact site (i.e., on-site mitigation) or at another location, usually within the same watershed as the permitted impact (i.e., off-site mitigation). The project proponent/permit applicant retains responsibility for the implementation and success of the mitigation project.

Evidence of compliance with this mitigation measure shall be provided prior to construction and grading activities for the proposed project.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to biological resources. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
V. Cultural and Tribal Cultural Resources <i>Would the project:</i>					
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	Less than significant impact.	No	No	No	None
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less than significant impact with mitigation incorporated.	No	No	No	MM 3.5.2a; MM 3.5.2b
c) Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant impact with mitigation incorporated.	No	No	No	MM 3.5.2a; MM 3.5.3b
<i>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</i>					
d) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	N/A	No	No	No	None
e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section	N/A	No	No	No	None

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.					

Discussion

A Historic Built Environment Assessment (Historic Assessment) was prepared for the proposed project by South Environmental on July 14, 2022 (Appendix C). The purpose of the Historic Assessment is to determine whether the proposed project would result in impacts to historic built environment resources located within or adjacent to the project site. The Historic Assessment determined that one historic built environment resource more than 45 years old was identified within the project site. This resource was found not eligible under all designation criteria due to a lack of significant historical associations and architectural merit resulting from compromised integrity. Thus, no historical resources were identified within the project site as a result of this study.

A Section 106 Cultural Resources Assessment (Section 106 Assessment) was prepared for the proposed project by FCS on August 26, 2022. The purpose of the Section 106 Assessment is to document the presence or absence of any potentially significant prehistoric resources or historic properties located within the proposed project's Area of Potential Effect (APE), and, if historic properties would be affected by the proposed project, to propose recommendations to mitigate the effects. As discussed in the Section 106 Assessment, FCS recommends a finding of "no adverse effect" to known historic or archaeological resources.

While the assessment did not identify any known resources within the APE, the potential for subsurface archaeological deposits exists to the presence of recorded prehistoric resources in the general vicinity of the APE, as well as the geology, topography, and proximity of the APE to Santa Rosa Creek. This finding is consistent with the conclusions made in the previous EIR. The recommendations made for the proposed project in the Section 106 Assessment have been incorporated into the adopted MMs related to Cultural Resources. Please note that the Section 106 Assessment is considered confidential due the sensitive information pertaining to cultural resources and has not be included in the appendices of this document.

Cultural Resources

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not adversely impact historic resources because compliance with the General Plan and City Code provisions would ensure that such

potential resources are assessed prior to development. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would result in the removal of the existing structures on the project site. As discussed above, these structures have been assessed for historical significance by the Historic Assessment and were determined to not meet federal, State, or local criteria to be considered significant historic resources.. Thus, the proposed project would not result in a substantial change to a historic resource. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout may adversely impact archaeological resources because of the possibility for inadvertent discovery during development activities. The previous EIR set forth adopted Specific Plan MM 3.5.2a and MM 3.5.2b, which require archaeological studies prior to development and the implementation of inadvertent discovery procedures in the event of a find. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would result in ground disturbance and, thus, a Section 106 Cultural Resource Assessment was prepared in accordance with MM 3.5.2a. No known archaeological resources were determined to be present. In accordance with MM 3.5.2b, inadvertent discovery procedures would be implemented in the event a potential archaeological resource is encountered during ground disturbance. As further discussed below, MM 3.5.2b has been enhanced by the recommendations included in the Section 106 Assessment to better implement adopted MM 3.5.2b. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout may adversely impact human remains because of the possibility for inadvertent discovery during development activities. The EIR set forth MM 3.5.3, which requires implementation of inadvertent discovery procedures in the event of a find. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would result in ground disturbance and, thus, has the potential to encounter human remains. In accordance with MM 3.5.3b, inadvertent discovery procedures would be implemented in the event potential human remains are encountered during ground disturbance. As such, the proposed project would not introduce new environmental impacts or

create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Tribal Cultural Resources

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR did not address tribal cultural resources because this issue was not on the CEQA Appendix G Checklist. Nonetheless, MM 3.5.2b, which requires implementation of inadvertent discovery procedures in the event of a find, would serve to address impacts on tribal cultural resources. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would result in ground disturbance and, thus, has the potential to encounter human remains. In accordance with MM 3.5.2b, inadvertent discovery procedures would be implemented in the event tribal cultural resources are encountered during ground disturbance. As further discussed below, MM 3.5.2b has been enhanced by the recommendations included in the Section 106 Assessment to better implement adopted MM 3.5.2b. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

e) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR did not address tribal cultural resources because this issue was not on the CEQA Appendix G Checklist. Nonetheless, MM 3.5.3b, which requires implementation of inadvertent discovery procedures in the event of a find, would serve to address impacts on tribal cultural resources. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would result in ground disturbance and, thus, has the potential to encounter human remains. In accordance with MM 3.5.3b, inadvertent discovery procedures would be implemented in the event tribal cultural resources are encountered during ground disturbance. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

The following approved mitigation measures are required for all development projects within the Plan Area, which includes the proposed project.

- MM 3.5.2a** Phase 1 Archaeological Resource Study. When specific projects are proposed within the project area that involve ground-disturbing activity, a site-specific Phase I

archaeological resource study shall be performed by a qualified archaeologist or equivalent cultural resources professional that will include an updated records search, pedestrian survey of the project area, development of a historic context, sensitivity assessment for buried prehistoric deposits, and preparation of a technical report that meets federal and State requirements. If significant or unique resources are identified and cannot be avoided, treatment plans will be developed in consultation with the City and appropriate Native American representatives to mitigate potential impacts to less than significant based on the provisions of Public Resources Code Section 21083.2.

MM 3.5.2b Should any archaeological artifacts be discovered during construction of any project allowed under the Specific Plan, all construction activities shall be halted immediately within 50 feet of the discovery, the City shall be notified, and a professional archaeologist that meets the Secretary of the Interior's Standards and Guidelines for Professional Qualifications in archaeology and/or history shall be retained to determine the significance of the discovery. The professional archaeologist shall prepare a plan to identify, record, report, evaluate, and recover the resources as necessary, which shall be implemented by the developer. Construction within the area of the discovery shall not recommence until impacts on the archaeological resource are mitigated as described in MM 3.5.2a. Additionally, Public Resources Code Section 5097.993 stipulates that a project sponsor must inform project personnel that collection of any Native American artifacts is prohibited by law.

Adopted MM 3.5.2b shall be enhanced to include the following requirements as recommended in the Section 106 Cultural Resources Assessment prepared for the proposed project:

- An Archaeologist who meets the Secretary of the Interior's Professional Qualification Standards for archaeology shall be present to monitor during initial clearing and grubbing prior to grading and trenching of the Area of Potential Effect (APE), as identified by the Section 106 Cultural Resources Assessment. In the event exposed soils indicate cultural materials may be present, this may be followed by regular or periodic archaeological monitoring as determined by the Archaeologist.
- Adopted MM 3.5.2b shall apply to any cultural resources discovered at the site, including but not limited to stone, bone, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites.
- Reasonable efforts to avoid, minimize, or mitigate adverse effects to the property will be taken and the California Office of Historic Preservation (OHP) and Native American tribes with concerns about the property, and the Advisory Council on Historic Preservation (Council) shall be notified within 48 hours in compliance with 36 Code of Federal Regulations 800.13 (b)(3).

- MM 3.5.3b** Should human remains be discovered during construction of any project allowed under the Specific Plan, all construction activities shall be halted immediately within 50 feet of the discovery, the City shall be notified, and the Sonoma County Coroner shall be notified, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California’s Health and Safety Code. If the remains are determined to be Native American, the coroner will notify the Native American Heritage Commission, and the procedures outlined in CEQA Section 15064.5(d) and (e) shall be followed.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to cultural and tribal cultural resources. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VI. Energy <i>Would the project:</i>					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	N/A	No	No	No	None
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	N/A	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined implementation of General Plan 2035 policies would reduce energy consumption and emphasize the efficient use of energy sources, resulting in a less than significant impact related to energy consumption and inefficient use of energy.

851 Brittain Lane Subdivision Project Analysis and Conclusions

Energy is generally transmitted either in the form of electricity, measured in kilowatts (kW)¹⁸ or megawatts (MW),¹⁹ or natural gas measured in US Therms.²⁰ Electricity is used primarily for lighting, appliances, and other uses associated with the proposed project. Natural gas is used primarily for space and water heating, when applicable.

Construction

The proposed project would require demolition, site preparation, grading, building construction, architectural coating, and paving activities. Project construction would require energy for the manufacture and transportation of building materials, preparation of the site

¹⁸ 1 kW = 1,000 watts; A watt is a derived unit of power that measure rate of energy conversion. 1 watt is equivalent to work being done at a rate of 1 joule of energy per second. In electrical terms, 1 watt is the power dissipated by a current of 1 ampere flowing across a resistance of 1 volt.

¹⁹ 1 MW = 1 million watts

²⁰ A unit for quantity of heat that equals 100,000 British thermal units. A British thermal unit is the quantity of heat required to raise the temperature of 1 pound of liquid water 1 degree Fahrenheit at a constant pressure of 1 atmosphere.

(e.g., site clearing, and grading), and the actual construction of the building. Petroleum-based fuels such as diesel fuel and gasoline would be the primary sources of energy for these tasks.

The types of on-site equipment used during construction of the proposed project could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, frontend loaders, forklifts, and cranes. Construction equipment is estimated to consume a total of 59,104 gallons of diesel fuel over the entire construction duration (Appendix A).

Fuel use associated with construction vehicle trips generated by the proposed project was also estimated; trips include construction worker trips, haul truck trips for material transport, and vendor trips for construction material deliveries. Fuel use from these vehicles traveling to the project site was based on (1) the projected number of trips the proposed project would generate during construction, (2) average trip distances by trip type, and (3) fuel efficiencies estimated in the ARB Emissions Factors mobile source emission model (EMFAC). The specific parameters used to estimate fuel usage are included in Appendix A. In total, the proposed project is estimated to generate 129,560 VMT and a combined 4,982 gallons of gasoline and diesel for vehicle travel during construction.

Other equipment could include construction lighting, field services (office trailers), and electrically driven equipment such as pumps and other tools. Singlewide mobile office trailers, which are commonly used in construction staging areas, generally range in size from 160 square feet to 720 square feet. A typical 720-square-foot office trailer would consume approximately 30,109 kilowatt-hours (kWh) during the roughly 2.5-year construction period (Appendix A).

The proposed project's construction is not anticipated to result in unusually high energy use. Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. Similarly, compliance with State regulations would limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. Additionally, the overall construction schedule and process is already designed to be efficient to avoid excess monetary costs. For example, equipment and fuel are not typically used wastefully due to the added expense associated with renting the equipment, maintaining it, and fueling it. Therefore, the opportunities for future efficiency gains during construction are limited. Therefore, it is anticipated that construction of the proposed project would not result in wasteful, inefficient, and unnecessary energy consumption.

Operation

The proposed project would consume energy as part of building operations and transportation activities. Energy consumption of the proposed project is summarized in Table 11. As described previously, the proposed project would be all-electric, include rooftop solar panels, and would not include natural gas utilities.

Table 11: Annual Project Energy Consumption

Energy Consumption Activity	Annual Consumption
Electricity Consumption	422,743 kWh/year
Natural Gas Consumption	0 kBTU/year
Total Fuel Consumption	48,239 gallons/year
Notes: kBTU = kilo-British Thermal Unit kWh = kilowatt-hour Source: Appendix A	

Unmitigated operation of the proposed project would consume an estimated 422,743 kWh of electricity and an estimated 0 kilo-British Thermal Unit (kBTU) of natural gas on an annual basis. The proposed project would be considered to result in a potentially significant impact if it would result in wasteful, inefficient, or unnecessary consumption of energy resources.

Considering the guidance provided by Appendix F of the CEQA Guidelines²¹ and the Appellate Court decision in *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) Cal.App.5th 63, 164-168²², the proposed project would be considered to result in wasteful, inefficient, or unnecessary consumption of energy resources if it would conflict with the following energy conservation goals:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas, or oil; and
- Increasing reliance on renewable energy sources.

Decreasing Overall Per Capita Energy Consumption

The TIA determined that the countywide residential VMT per capita generated by the Sonoma County Transportation Authority (SCTA) travel demand model has a baseline average residential VMT of 16.60 miles per capita while the proposed project would generate 15.02 VMT based on the project site location within Traffic Analysis Zone (TAZ) 473. As described in the TIA, the proposed project residential density of 20.4 units per net acre would result in a reduction in VMT to 10.90 VMT per capita. As discussed in Section 2.17, Transportation, the proposed project would result in an approximately 27.4 percent reduction in per capita VMT from regional average estimates. As such, the proposed project would result in an overall decrease in per capita transportation energy consumption with respect to resident transportation energy resources.

²¹ California Department of Resources. 2022. CEQA Guidelines. Website: https://www.califaep.org/statute_and_guidelines.php. Accessed July 11, 2022.

²² Arthur F. Koon. February 23, 2022. Miller, Starr, Regalia. Website: <https://www.ceqadevelopments.com/2022/02/23/third-district-addresses-significant-ceqa-issues-in-mixed-decision-on-placer-countys-eir-for-specific-plan-rezoning-allowing-development-of-martis-valley-timberlands/>. Accessed July 11, 2022.

In 2020, Sonoma County consumed a total 1,346,565 megawatt-hours (MWh) of electricity and 69.19 million US Therms, or approximately 69,190,000 Million Metric British Thermal Units (MMBTU), as well as had a population of 488,863 residents.^{23,24} As such, the County currently has an estimated per capita energy consumption of 2,754 kWh and 142 MMBTU per year. As shown in Table 11, the proposed project would result in up to 422,743 kWh per year and 0 kBTU/year per year. Considering the City's average persons per household of 2.61,²⁵ the proposed project, consisting of 82 dwelling units, would result in the introduction of an estimated 214 new residents. Therefore, the proposed project would result in a per capita energy consumption of 1,975 kWh per year and 0 MMBTU per year, both of which would be below the County's average electricity and natural gas consumption rates. As such, the proposed project would contribute to the overall energy conservation goal of reducing per capita energy consumption.

Decreasing Reliance on Fossil Fuels

The proposed project would be designed and constructed in accordance with the California Building Code energy efficiency standards. For example, the proposed project would install solar photovoltaic systems capable of generating 144,320 kWh of electricity per year, and low-flow plumbing fixtures and irrigation heads that are compliant with the CBC. CBC energy efficiency standards include a broad set of energy conservation requirements that apply to the structural, mechanical, electrical, and plumbing systems in a building. Compliance with the CBC would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. As a result, the increase in energy conservation and efficiency would reduce the amount of potentially fossil fuel-sourced electricity consumption, and thereby reducing project reliance on fossil fuels.

Project-related vehicle trips would consume fuel throughout the life of the proposed project due to residents' vehicles and delivery vehicles traveling to and from the project site. This analysis evaluated operational fuel consumption based on the proposed project's operational assumptions. Regional access to the project site is provided by Highway 12, which is 100 feet north of the project site. As a result, the proposed project is located near regional and local roadways that would provide convenient access for future residents and would not result in excessively long VMT. Thus, the location of the proposed project would help minimize fossil fuel reliance with respect to transportation fuel consumption.

Increasing Reliance on Renewable Energy Sources

The proposed project would be considered to conflict with this criterion if it did not take steps to increase the reliance on renewable energy sources. As the proposed project constitutes a low-rise residential development, it would be required by the CBC to incorporate rooftop solar,

²³ California Energy Commission. 2022. Energy Consumption Database. Website: <http://www.ecdms.energy.ca.gov/>. Accessed June 10, 2022.

²⁴ California Department of Finance. 2022. E-5 Population and Housing Estimates for Cities, Counties, and State. Website: <https://dof.ca.gov/forecasting/demographics/estimates/estimates-e5-2010-2021/>. Accessed June 10, 2022.

²⁵ Ibid.

provided no code exemptions apply to the proposed project such as limited roof space or an alternative contribution to a community solar or battery storage facility.

As such, the proposed project plans to incorporate rooftop solar panels on each unit which would actively increase future residents' reliance on renewable energy sources. Moreover, the proposed project would be required to comply with the applicable electric vehicle (EV) charging infrastructure standards for the development type, such as pre-wiring to facilitate future installation of EV charging stations. As a result, the proposed project would be incrementally increasing overall reliance on renewable energy sources by including on-site renewable energy generation technologies and incorporating EV charging infrastructure to facilitate the future use of EVs.

Considering the above analysis, the proposed project would not result in the wasteful, inefficiency, or unnecessary consumption of energy resources. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that the Specific Plan would implement General Plan 2035 policies aimed at reducing energy use and improving energy efficiency. Therefore, the previous EIR concluded that the Specific Plan would not conflict with a State or local plan for energy efficiency and impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

Construction

The proposed project would result in energy consumption through the combustion of fossil fuels. Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations Title 13 Sections 2449(d)(3) and 2485 limit idling from both on-road and off-road diesel-powered equipment and are enforced by the ARB. The proposed project would be required to comply with these regulations. There are no renewable energy standards that would apply to construction of the proposed project. As a result, construction would not conflict with or obstruct any regulations adopted for the purposes of increasing the use of renewable energy. Furthermore, it is anticipated that construction of the proposed project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing energy use or increasing the use of renewable energy. Therefore, the proposed project would result in less than significant impacts related to construction energy efficiency and use of fossil fuels or decreased use of renewable resources.

Operation

The proposed project would be served with electricity provided by Pacific Gas and Electric Company (PG&E). In 2019, PG&E obtained 29 percent of its electricity from renewable energy sources while the remaining electricity was sourced from nuclear (44 percent), and large

hydroelectric (27 percent).²⁶ PG&E also offers a Solar Choice 50 percent option that sources 64 percent of its power mix from eligible renewable energy sources and a Solar Choice 100 percent option that sources 100 percent of its power mix from eligible renewable energy sources. Therefore, the proposed project's electricity provider meets the State's current objective of 33 percent. The proposed project's electricity provider would also be required to meet the State's future objective of 60 percent of in-State electricity sales being generated from renewable energy sources by 2030. The buildings would be designed in accordance with California Code of Regulations Title 24, California's Energy Efficiency Standards for Residential Buildings as applicable. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., heating, ventilation, and air conditioning [HVAC] and water heating systems), and indoor and outdoor lighting. For example, the proposed project would install solar photovoltaic systems capable of generating an estimated 144,320 kWh of electricity per year and low-flow plumbing fixtures and irrigation heads that are compliant with Title 24 Standards.

The proposed project would be required to comply with the applicable Title 24 Energy Efficiency Standards (for example, EV charging infrastructure and solar requirements) in effect at the time building permit applications are received, which are currently the 2019 standards. As more stringent State and local regulations are adopted with the purpose of reducing energy use the proposed project would be required to incorporate the applicable design features to meet new standards. In doing so, the proposed project would be consistent with the energy conservation policies stated in the City's General Plan and CAP because it would comply with the relevant solar power building code, utilize passive energy efficiency through low water demand landscaping, and comply with other relevant CBC standards. As described in Section 2.8 Greenhouse Gas Emissions, the proposed project applicant prepared a CAP New Development Checklist that outlines how the proposed project would include project design features that reduce energy usage and ensure consistency with the City of Santa Rosa CAP.

As such, the proposed project would not conflict with or obstruct the applicable plan for renewable energy or energy efficiency. Therefore, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

²⁶ Pacific Gas and Electric Company (PG&E). 2019 Power Content Label. Website: https://www.pge.com/pge_global/common/pdfs/your-account/your-bill/understand-your-bill/bill-inserts/2020/1220-PowerContent-ADA.pdf. Accessed June 10, 2022.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to energy. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VII. Geology, Seismicity, and Soils <i>Would the project:</i>					
a) Directly or indirectly cause 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.	Less than significant impact.	No	No	No	None
ii) Strong seismic ground shaking?	Less than significant impact.	No	No	No	None
iii) Seismic-related ground failure, including liquefaction?	Less than significant impact.	No	No	No	None
iv) Landslides?	Less than significant impact.	No	No	No	None
b) Result in substantial soil erosion or the loss of topsoil?	Less than significant impact.	No	No	No	None
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?	Less than significant impact.	No	No	No	None

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less than significant impact.	No	No	No	None
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Less than significant impact.	No	No	No	None
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	N/A	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

Overall, as discussed further below, the previous EIR concluded that buildout of the development and land use activities contemplated by the Specific Plan may expose people or structures to potential substantial adverse effects associated with seismic hazards, such as fault rupture, strong ground shaking, and seismic-related ground failure or landslides; however, impacts would be less than significant. The previous EIR notes that the Alquist-Priolo earthquake fault zone has been delineated in the City, but it does not extend into the project area. Therefore, previous EIR concluded that no impact would occur related to a Alquist-Priolo fault zone. However, the previous EIR notes that the project area could experience strong ground shaking as a result of an earthquake on the Hayward-Rodgers Creek fault. Further, the Specific Plan area is located in the California Building Standards Code (CBC) Seismic Zone 4, as is the rest of the City and the Bay Area. Therefore, all future development would be required to meet the most stringent CBC standards for Seismic Zone 4 in effect at the project design phase. Additionally, the previous EIR notes that the Specific Plan area is flat and not located near hilly or mountainous terrain that could pose a landslide risk. The previous EIR found that the project area is not mapped by the CGS as being located within an earthquake-induced landslide zone. However, slopes adjacent to the creeks that flow through and adjacent to the Specific Plan area may be subject to some type of slope failure as a result of violent ground

shaking. However, the previous EIR concluded that with mandatory compliance with the General Plan and the CBC, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

General Plan Policies NS-C 1 and NS-C 2 in the Noise and Safety Element require comprehensive geologic studies and/or a geotechnical investigation to be prepared prior to development approval, which would identify and provide mitigation for faults designated by the provisions of the Alquist-Priolo Earthquake Fault Zoning Act as well as landslide risk, liquefaction potential, settlement, seismically induced land sliding, or weak and expansive soils. As such, a Preliminary Geotechnical Investigation (Geotechnical Investigation) was prepared by Quantum Geotechnical, Inc. for the proposed project dated February 2, 2022, and included in Appendix D of this document.

The Geotechnical Investigation concluded that the project site is suitable for the construction of the proposed project with the incorporation of the recommendations included in the Geotechnical Investigation. The primary geotechnical features identified at the project site would be: (1) the presence of moderately expansive near surface clay soil, which is prone to heave and shrink movements with changes in moisture content and must be carefully considered in the design and construction of foundations, drainage, hardscape, and pavements, and (2) the potential for liquefaction, likely resulting in the liquefaction induced settlement of up to 1 inch. The Geotechnical Investigation includes recommendations for grading, construction, and operation that address soil corrosivity, surface and subsurface drainage, bio-filtration facilities, the building foundations, concrete flatwork, retaining walls, flexible pavement areas, and utility trenches as well as provides directions for project review and construction monitoring. Consistent with Policies NS-C 1 and NS-C 2, the proposed project would incorporate the recommendations included in the Geotechnical Investigation into the project design and grading/building plans to ensure that the appropriate grading and construction methods are implemented to address the site-specific conditions.

i) Rupture of a known earthquake fault?

As discussed above, the project site is not within an Alquist-Priolo Fault Hazard Zone. According to the California Geologic Survey (CGS) California Earthquake Hazards Zones application, the Rodgers Creek Fault Zone is closest fault zone to the project site, approximately 3.1 miles east.²⁷ In addition to the Rodgers Creek Fault Zone, the Geotechnical Investigation identified an unnamed fault approximately 0.8 miles from the project site and the Bennett Valley Fault Zone, which is approximately 5.9 miles from the project site. Thus, the potential damaging effects of regional earthquake activity would be considered in the design of the proposed project. The proposed project design would comply with Chapter 16 of the 2019 CBC. The 2019 CBC utilizes the design procedures outlined in the ASCE 7-16 Standard. Further, the proposed project would implement the applicable recommendations included in the Geotechnical Investigation, as discussed above. As such, the proposed project would not

²⁷ California Department of Conservation. 2022. EQ Zapp: California Earthquake Hazards Zone Application. Available: <https://www.conservation.ca.gov/cgs/geohazards/eq-zapp>. Accessed June 6, 2022.

introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

ii) Strong seismic ground shaking?

The project site is located within a seismically active region of California. Thus, development of the proposed project may expose persons or structures to strong ground shaking hazards. In accordance with State law and local ordinances, the proposed project would be required to comply with the applicable provisions of the CBC, which would serve to abate any hazards. Further, the proposed project would implement the applicable recommendations included in the Geotechnical Investigation, as discussed above. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

iii) Seismic-related ground failure, including liquefaction?

As previously discussed, the project site is located within a seismically active region of California. Thus, development of the proposed project may expose persons or structures to seismic-related ground failure hazards. Further, the Geotechnical Investigation determined that the project site is subject to moderate liquefaction susceptibility as shown on the liquefaction susceptibility maps from the Association of Bay Area Governments (ABAG)²⁸ and estimated that, based on the borings of the site soil, liquefaction induced settlement could occur up to 1 inch. Therefore, in accordance with State law and local ordinances, the proposed project would be required to implement the applicable recommendations included in the Geotechnical Investigation, as discussed above, as well as to comply with the applicable provisions of the CBC, which would serve to abate any hazards. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

iv) Landslides?

The project site contains flat relief is not at the base of any significant slopes; therefore, impacts related to landslides would be low. However, the proposed project would be required to comply with the applicable CBCs, and the applicable recommendations contained in the Geotechnical Investigation. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that buildout of vacant sites could involve the removal of vegetation that currently helps to stabilize site soils. The exposure of the soils during land clearing and grading activities could lead to increased surface runoff and erosion, with possible

²⁸ Association of Bay Area Governments. 2022. Interactive Liquefaction Susceptibility Map. Available: <https://abag.ca.gov/our-work/resilience>. Accessed June 6, 2022.

impacts to Roseland Creek, Santa Rosa Creek, or Colgan Creek. Because the project area does not contain steep slopes or grades, the potential for soil erosion is slight and soil loss can be easily controlled. The previous EIR concluded that all future development associated with buildout would be required to develop a SWPPP, per the City's Storm Water Management Plan. Thus, the previous EIR concluded that, with compliance with the CBC; the Santa Rosa City Code, which provides guidance on erosion and grading controls; and the City's Storm Water Management Plan, buildout would not result in substantial erosion. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

Development of the proposed project would involve ground-disturbing activities including grading and trenching. Thus, development of the proposed project may result in erosion or sedimentation. However, in accordance with State law and local ordinances, the proposed project would be required to comply with the applicable stormwater pollution prevention regulations, which would serve to abate any hazards. The proposed project would be required to develop a SWPPP, and its implementation would minimize erosion potential by identifying project design features and Best Management Practices (BMPs) that could be used during and following construction to control, prevent, remove, or reduce stormwater pollution from the site, including sediment from erosion. Soil erosion potential would also be reduced once the soil is graded and covered with concrete, structures, or asphalt. Further, the proposed project would be required to comply with the CBC and the applicable provisions of the Santa Rosa City Code, specifically Chapter 19-64, Grading and Erosion Control. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that the Specific Plan area would not be susceptible to hazards associated with unstable soils or geologic units because of compliance with Santa Rosa City Code provisions that pertain to grading and construction. Additionally, the previous EIR noted that future development associated with buildout would be required to comply with General Plan Policy NS-C 2, which requires a geotechnical investigation to be prepared to determine the presence of unstable soil and geologic units on the project site. The previous EIR concluded that, in general, soils can be engineered in accordance with the CBC and other geotechnical requirements to provide sufficient foundation for structures to account for underlying soil characteristics. This may include removal of any non-suitable soils and replacement with compacted and moisture-conditioned engineered fill in accordance with accepted geotechnical standard. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The project site is located within a seismically active region of California. Thus, development of the proposed project may expose persons or structures to seismic-related ground failure hazards. As discussed above, the project site is subject to moderate liquefaction susceptibility

with the potential of liquefaction induced settlement of up to 1 inch. Additionally, the Geotechnical Investigation discussed that strong earthquake shaking could cause densification of loose to medium dense cohesionless soils above the groundwater table. Therefore, cohesionless soil at the project site was generally medium dense and dense, and the potential for dynamic settlement is considered by negligible. The proposed project be required to comply with the CBC, Santa Rosa City Code, and the General Plan, which requires the proposed project to implement any applicable recommendations contained in the Geotechnical Investigation related to seismic-related ground failure, to abate any hazards. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that the Specific Plan area would not be susceptible to expansive soil hazards because of compliance with Santa Rosa City Code provisions that pertain to grading and construction. Additionally, as discussed above, the previous EIR noted that future development associated with buildout would be required to comply with General Plan Policy NS-C 2, which requires a geotechnical investigation to be prepared to determine the presence of expansive soils on the project site. The previous EIR concluded that, in general, soils can be engineered in accordance with the CBC and other geotechnical requirements to provide sufficient foundation for structures to account for underlying soil characteristics. This may include removal of any non-suitable soils and replacement with compacted and moisture-conditioned engineered fill in accordance with accepted geotechnical standard. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

According to the Geotechnical Investigation, the project site is underlain by Alluvial land soils, which has high clay content; however, the Geotechnical Investigation determined that there is moderately expansive near surface clay soil on the project site. According to the Geotechnical Investigation, the project site's plasticity Index (PI) values ranged from 8 to 18 when tested. The moderately expansive material is prone to heave and shrink movements with changes in moisture content which requires careful consideration in the design and construction of foundations, drainage, hardscape, and pavements. Thus, the Geotechnical Investigation recommends that post-tensioned slab foundations are the most appropriate foundation system for the proposed structures on the project site. In accordance with State law and local ordinances, the proposed project would be required to comply with the applicable provisions of the CBC and City Codes, which would serve to abate any hazards. Additionally, the proposed project would implement the recommendations contained in the Geotechnical Investigation, which would reduce risks related to expansive soil risk. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

e) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not result in the installation of new septic or alternative wastewater disposal systems because the Santa Rosa City Code requires that new development connect to the municipal wastewater system. Therefore, no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would connect to the Santa Rosa municipal sewer system. No septic or alternative wastewater disposal systems would be employed. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

f) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR and General Plan EIR

The General Plan's EIR does not identify paleontological resources in the City and the sedimentary rocks of the Glen Ellen and Huichica formations have not been identified as important paleontological resources formations. Thus, the previous EIR concluded that the geologic formations that underlie the project area have not been identified as important paleontological resource formations, or unique geological features. Thus, the previous EIR did not further evaluate paleontological resources. As such, the likelihood of encountering paleontological resources is remote.

851 Brittain Lane Subdivision Project Analysis and Conclusions

As previously discussed, no paleontological resources have been identified by the previous EIR on the project site. Additionally, the Geotechnical Investigation found that the project site is underlain by Alluvial land soils, which have a low potential for paleontological resources due to their recent age. Moreover, the proposed project involves slab-on-grade construction; no excavations for basements or parking garages are proposed. As such, the likelihood of encountering paleontological resources is remote. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to geology, seismicity, and soils. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VIII. Greenhouse Gas Emissions <i>Would the project:</i>					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than significant impact.	No	No	No	None
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that the Specific Plan would be consistent with the City of Santa Rosa Climate Action Plan (CAP) because it would include mixed use development in urban, infill areas of the City, land uses already considered in the General Plan 2035, and alternative transportation improvements that would improve bicycle, pedestrian, and transit. The previous EIR found that the Specific Plan would result in a net decrease in VMT due to less nonresidential uses compared to General Plan land use designations. As a result, the previous EIR concluded that because the Specific Plan would reduce the VMT compared to existing General Plan conditions, the development proposed by the Specific Plan would generate less GHG emissions compared to what was predicted in the CAP. Therefore, the previous EIR calculated that development of the Specific Plan would not generate significant GHG emissions and would result in less than significant impacts.

851 Brittain Lane Subdivision Project Analysis and Conclusions

Both construction and operational activities have the potential to generate GHG emissions. The proposed project would generate GHG emissions during temporary (short-term) construction activities such as demolition, site preparation and grading, running of construction equipment engines, movement of on-site heavy-duty construction vehicles, hauling of materials to and from the project site, asphalt paving, and construction worker motor vehicle trips.

Long-term, operational GHG emissions would result from project-generated vehicular traffic, operation of any landscaping equipment, off-site generation of electrical power over the life of

the proposed project, the energy required to convey water to and wastewater from the project site, and the emissions associated with the hauling and disposal of solid waste from the project site.

The BAAQMD updated their GHG thresholds for land use development projects on April 22, 2022. Now, one of the following thresholds must be met in order to determine whether a development project would not result in a significant impact related to GHG emissions. A project would not result in significant impacts if it achieves either Threshold A or B:

- A. Projects must include, at a minimum, the following project design elements:
 - 1. Buildings
 - a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
 - b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
 - 2. Transportation
 - a. Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill (SB) 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
 - I. Residential projects: 15 percent below the existing VMT per capita
 - II. Office projects: 15 percent below the existing VMT per employee
 - III. Retail projects: no net increase in existing VMT
 - b. Achieve compliance with off-street EV requirements in the most recently adopted version of the California Green Building Standards Code (CALGreen) Tier 2.
- B. Projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

As described in the BAAQMD Thresholds of Significance Justification Report, these new thresholds are intended to ensure every new development project contributes its “fair share” of what will be required to achieve California’s long-term 2045 climate goals.²⁹

Threshold A

Natural Gas Prohibition Provision

The first provision requires that the proposed project not include natural gas plumbing and instead relies on electricity as the primary building energy source. As noted in Section III, Air Quality, of this document, the proposed project would be designed as all-electric, would include rooftop solar panels on all townhomes, and would not include natural gas utilities or

²⁹ Bay Area Air Quality Management District (BAAQMD). 2022. Website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed June 3, 2022.

hookups. As such, the proposed project would be compliant with this provision under Threshold A.

Wasteful, Inefficient, or Unnecessary Energy Consumption Provision

Section VI, Energy, describes that the proposed project would not result in any wasteful, inefficient, or unnecessary energy usage during either construction or operation due to compliance with existing State and local regulations, such as Title 24, and the project design features that utilize rooftop solar, low water demand, drought tolerant landscaping, and EV charging utilities within each townhome garage. Title 24 standards, widely regarded as the most advanced energy efficiency standards, would help reduce the amount of energy required for lighting, water heating, and heating and air conditioning in buildings and promote energy conservation. Therefore, the proposed project would be consistent with this provision under Threshold A.

Electric Vehicle Charging Infrastructure Provision

In order to achieve compliance with EV requirements in the most recently adopted version of CALGreen Tier 2, the proposed project would need to include at a minimum four EV capable charging stations.³⁰ EV capable charging stations means the installation of a “raceway” (the enclosed conduit that forms the physical pathway for electrical wiring to protect it from damage) and adequate panel capacity to accommodate future installation of a dedicated branch circuit and charging station(s).³¹ As described previously, the proposed project would include EV charging capable hookups within each townhome garage. Therefore, the proposed project would be consistent with this provision under Threshold A.

Vehicle Miles Traveled Provision

In addition, as described in Section 2.17 Transportation of this document, the proposed project would result in a per unit VMT of 10.90 miles per trip, which is below the threshold of 14.11 miles per capita. As a result, the proposed project would achieve a reduction in project-generated VMT below the regional average and would meet a locally adopted SB 743 VMT target for residential projects. Therefore, the proposed project would meet all the criteria shown under Threshold A.

Threshold B

Furthermore, the proposed project would be consistent with the Santa Rosa CAP, which is a local GHG emissions reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b). Therefore, the proposed project would be consistent with Threshold B as well. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

³⁰ California Green Building Standards Code (CALGreen). 2022. Website: 2019 California Green Building Standards code, Title 24, Part 11 with July 2021 Supplement - CHAPTER 5 (iccsafe.org). Accessed June 14, 2022.

³¹ City of Sacramento. Electric Vehicle Infrastructure Requirements in CALGreen Building Code. 2020. Website: https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Building/Sacramento-Streamline/EV-Infrastructure-Reqs-in-CALGreen-Building-Code_April-2020.pdf?la=en. Accessed June 14, 2022.

The proposed project construction and operational GHG emissions are presented for informational purposes and no longer determine a project's impact significance.

Project Construction

The proposed project would emit GHG emissions during construction from off-road equipment, worker vehicles, and material delivery and/or hauling. Detailed construction assumptions are provided in Appendix A. The BAAQMD does not presently provide a construction-related GHG generation threshold but recommends that construction-generated GHG emissions be quantified and disclosed. Total GHG emissions generated during all phases of construction were combined and are presented in Table 12.

Table 12: Construction Greenhouse Gas Emissions

Construction Year	MT CO ₂ e per year ^{1,2}
Phase 0—Site Work for the Entire Project Site	235
Phase 1—17 of 82 townhomes	69
Phase 2—17 of 82 townhomes	70
Phase 3—17 of 82 townhomes	69
Phase 4—17 of 82 townhomes	70
Phase 5—14 of 82 townhomes	56
Total Construction Emissions	569
Notes: MT CO ₂ e = metric tons of carbon dioxide equivalent ¹ Emissions are rounded to the nearest whole number. ² Emissions were estimated assuming diesel fuel to represent a reasonably worse-case scenario in the absence of project-specific information that would be needed to override the CalEEMod default assumptions. The proposed project would limit emissions by using electrified equipment or alternatively fueled equipment as feasible. Source: CalEEMod Output (Appendix A).	

As shown in Table 12, construction of the proposed project is estimated to generate approximately 569 MT CO₂e over the entire project construction duration. As discussed above, neither the City nor the BAAQMD have an adopted thresholds of significance for construction-related GHG emissions. Construction would be temporary and would not result in a permanent increase in emissions.

The Santa Rosa CAP New Development Checklist includes measures to ensure new development projects are compliant with the City's CAP. Compliance with applicable regulations and consistency with the CAP would ensure the proposed project would not interfere with the implementation of AB 32 or SB 32. The proposed project's consistency with the CAP is described in detail below. Impacts related to a proposed project's consistency with a GHG emissions reduction plan, including the City's CAP, are primarily related to long-term

operational activities. However, short-term construction activities would comply with and use equipment and fuel consistent with State and local requirements.

Project Operation

Operational or long-term emissions occur over the life of a project. The major sources for operational GHG emissions include:

- **Motor Vehicles:** These emissions refer to exhaust related GHG emissions from the cars and trucks that would travel to and from the project site. Vehicle trips associated with project operations would primarily include resident trips to and from the proposed project. Trip generation rates used in estimating mobile source emissions were consistent with those presented in the traffic analysis prepared for the project by W-Trans.³² The trip generation potential is estimated to result in an average of 590 trips per day.
- **Natural Gas:** These emissions refer to the GHG emissions that occur when natural gas is burned on the project site for heating water, space heating, dryers, stoves, or other uses.
- **Indirect Electricity:** These emissions refer to those generated by off-site power plants to supply electricity required for the proposed project. PG&E is a utility providing electricity and natural gas service to Sonoma County. The proposed project would receive natural gas through PG&E. The proposed project would be served with electricity generated by Sonoma Clean Power and delivered by PG&E. GHG emissions from energy consumption were calculated using PG&E's electricity intensity factors for CO₂, N₂O, and CH₄. Additionally, the CEDC building would include a solar photovoltaic system on the roof that would generate on-site renewable energy.
- **Water Transport:** These emissions refer to those associated with the electricity required to transport and treat the water to be used on the project site.
- **Waste:** These emissions refer to the GHG emissions produced by decomposing waste generated by the project.

As described previously, the proposed project would be built as an all-electric development with rooftop solar and no natural gas appliances or plumbing. As such, the proposed project would not generate GHG emissions associated with the use of natural gas.

The proposed project's operational emissions were estimated with CalEEMod Version 2020.4.0. CalEEMod assumes compliance with some, but not all, applicable State-level rules and regulations regarding energy efficiency, vehicle fuel efficiency, renewable energy usage, and other GHG emissions reduction policies.

As shown in Table 13, operation of the proposed project would generate approximately 561 MT CO₂e per year with incorporation of the amortized construction emissions, after full buildout in 2024. The majority of the proposed project's emissions would be from passenger vehicles accessing the project site. Emissions in future years would be reduced through an

³² W-Trans. 2022. Preliminary Transportation Study for the 851 Brittain Lane Project. May 27.

increase in the use of renewable sources of energy, turnover of older vehicles, introduction of cleaner fuels and implementation of more stringent emissions control technology.

Table 13: Annual Operational GHG Emissions

Emission Source	Year 2024 Total Emissions (MT CO ₂ e per year)	Year 2030 Total Emissions (MT CO ₂ e per year)
Area	3	3
Energy	40	40
Mobile	471	392
Waste	19	19
Water	10	10
Amortized Construction Emissions	19	19
Total Project Emissions	561	482
Notes: AB = Assembly Bill MT CO ₂ e = metric tons of carbon dioxide equivalent. Unrounded results used to calculate totals. Source of Emissions: CalEEMod Output (Appendix A). Source of Threshold: BAAQMD 2017.		

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that the Specific Plan would be consistent with the City's CAP, which is a Qualified GHG Emissions Reduction Strategy as defined by the BAAQMD and was developed to comply with the requirements of AB 32 and achieve the goals of the AB 32 Scoping Plan as well as post-2020 GHG reduction targets. The previous EIR identified that the Specific Plan would include land uses consistent with the General Plan and thus would not change the conclusions from the CAP based on GHG emissions associated by land use. Therefore, the previous EIR concluded that because the Specific Plan would improve alternative transportation access, consistent with General Plan and CAP goals and policies, the Specific Plan would not conflict with an adopted plan or regulation reducing GHG emissions and impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The City's CAP follows both the State CEQA Guidelines and BAAQMD's Guidelines by incorporating the standard elements of a Qualified GHG Emissions Reduction Strategy. Standard elements of a Qualified GHG Reduction Strategy include measures or a group of measures (including performance standards) that demonstrate with substantial evidence that if implemented on a project-by-project basis would collectively achieve specified emissions levels.

Appendix D of the City’s CAP describes in detail how the City’s CAP was developed to satisfy the requirements of the BAAQMD’s guidelines on the standard elements of a Qualified GHG Reduction Strategy, with the intent to allow future development projects to determine that a project has a less than significant impact on GHG emissions as long as it is in compliance with the City’s CAP. These standard elements of a Qualified GHG Reduction Strategy and the of incorporation of each element into the City’s CAP are provided in Table 14.

Table 14: City of Santa Rosa Climate Action Plan Consistency with Elements of a Qualified Greenhouse Gas Reduction Strategy

Standard Elements of a Qualified GHG Reduction Strategy	The City of Santa Rosa Climate Action Plan’s Incorporation of Elements of a Qualified GHG Reduction Strategy
Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic range.	Incorporated. The CAP consists of a citywide GHG emissions inventory, which separates activities that generate GHG emissions into sectors including vehicle transportation, building energy usage, water delivery systems and others. The CAP includes existing and projected GHG emission for the defined geographic range of the City of Santa Rosa. “Business-as-usual GHG forecast” (status quo before State, regional, and local reduction efforts are taken into consideration) GHG emissions are included in the CAP for years 2007, 2015, 2020, and 2035.
Establish a level, based on substantial evidence below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.	Incorporated. The City, in coordination with the Climate Protection Campaign, Sonoma County, and the other nine municipalities in Sonoma County, established one of the most aggressive GHG emissions reduction targets in the State and nation by committing to reduce GHG emissions 25 percent below 1990 levels by 2015. The CAP demonstrates that the City would meet this reduction goal by 2020 with implementation of measures in the CAP. Furthermore, this goal exceeds the requirements of the AB 32 2020 reduction targets. With implementation of the reduction measures a total of 558,090 MT CO ₂ e is expected to be reduced in the City of Santa Rosa by 2020. The CAP includes calculated GHG emission reductions with implementation of the CAP not just for comparison to the 2020 targets but also out to year 2035, to be consistent with the planning horizon of the General Plan. As summarized on page ES-7 of the CAP, implementation of the measures of the Santa Rosa CAP are expected to decrease GHG emissions to 2.3 MT CO ₂ e per person per year-by-year 2035.
Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area.	Incorporated. As previously mentioned, the CAP demonstrates that the City would reduce GHG emissions 25 percent below 1990 levels by year 2020. The CAP includes calculated GHG emission reductions with implementation of the CAP not just for comparison to the 2020 targets but also out to year

Standard Elements of a Qualified GHG Reduction Strategy	The City of Santa Rosa Climate Action Plan's Incorporation of Elements of a Qualified GHG Reduction Strategy
	<p>2035, to be consistent with the planning horizon of the General Plan. As summarized on page ES-7 of the CAP, implementation of the measures of the Santa Rosa CAP are expected to decrease GHG emissions to 2.3 MT CO₂e per person per year-by-year 2035. In addition, the CAP states that its reduction measures build on previous efforts (particularly the Climate Protection Campaign's Community CAP). In addition, the measures offer a diverse mix of regulatory and incentive-based programs for both new and existing development.</p>
Specify measures or a group of measures, including performance standards that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.	<p>Incorporated. As explained on page ES-9 of the CAP, the CAP includes an implementation chapter and implementation matrix with details specific to each measure. Details described in the matrix include the following for individual measures: the responsible department, the implementation timeframe, and co-benefits. The CAP intended for this implementation matrix to be used to monitor the City's progress toward implementing the goals and policies included in the CAP. At the project level, the CAP includes a New Development Checklist for individual development projects to fill out to demonstrate compliance with the CAP.</p>
Monitor the plan's progress.	<p>Incorporated. As previously explained, the CAP includes an implementation matrix that will be used to monitor the City's progress toward implementing the goals and policies included in the CAP. The plans for implementation and monitoring are further explained on page D-9 of the CAP. The CAP indicates that it plans for staff to coordinate City Green Team meetings, track implementation of GHG reduction strategies and progress toward GHG reduction targets and prepare annual reports to the City Council on CAP implementation and progress.</p> <p>The City has actively implemented and continues to actively implement GHG reduction measures from the community-wide CAP (City's CAP) applicable to this project and the Municipal Operations Climate Action Plan (Municipal CAP), with goals and policies related to GHG emissions produced by municipal activities and developments, to reduce local GHG emissions to meet State, regional, and local reduction targets. These actions are documented on "Climate Action Planning in Santa Rosa."³³</p> <p>In February 2019, the Santa Rosa City Council designated implementation of the City's CAP as a Tier</p>

³³ City of Santa Rosa. Climate Action Planning in Santa Rosa. Website: <https://srcity.org/1634/Climate-Action-Planning>. Accessed June 3, 2022.

Standard Elements of a Qualified GHG Reduction Strategy	The City of Santa Rosa Climate Action Plan's Incorporation of Elements of a Qualified GHG Reduction Strategy
	One Council priority. A Climate Action Subcommittee was formed in 2019 to provide guidance and oversight of the implementation of the Municipal CAP and the City's CAP with a goal of reducing the local GHG emissions and ensuring long-term sustainability and resilience from climate change and its effects.
Adopt the GHG reduction strategy in a public process following environmental review.	Incorporated. The City's CAP was adopted on June 5, 2012, as a GHG reduction strategy in a public process following environmental review.
Notes: CAP = Climate Action Plan GHG = greenhouse gas Source of City's CAP: City of Santa Rosa. 2012. City of Santa Rosa Climate Action Plan. Website: https://srcity.org/DocumentCenter/View/10762 . Accessed June 5, 2022.	

As detailed in Table 14, the City's CAP remains a Qualified GHG Emissions Reduction Strategy and demonstrates that it would meet the anticipated State 2030 GHG emissions reductions targets. If the proposed project can demonstrate consistency with the City's CAP, its impacts related to GHG emissions would be considered less than significant and fully consistent with State GHG emissions reduction requirements. This is consistent with BAAQMD guidelines related to the analysis of projects and accounts for the anticipated updates to BAAQMD's 2030 GHG targets.

To ensure new development projects comply with the City's CAP, the City developed the New Development Checklist. The proposed project's compliance with the New Development Checklist is shown in Table 15. Measures denoted with an asterisk are required in all new development projects. As shown in the table, the proposed project would comply with all applicable requirements.

Table 15: Consistency with Santa Rosa's Climate Action Plan New Development Checklist

New Development Checklist Measures	Project Consistency
Required Measures	
1.1.1: Comply with CALGreen Tier 1 standards*	Complies. The City of Santa Rosa Ordinance Code Chapter 18-42 requires compliance with Tier 1 CALGreen standards. ¹ The proposed project would implement required green building strategies to comply with Tier 1 CALGreen standards. The proposed project includes sustainability design features that support the Green Building Strategy. ²
1.1.3: After 2020, all new development will utilize zero net electricity*	Complies. The proposed project would be required to comply with California's Building Energy Efficiency Standards. ² The City of Santa Rosa Ordinance Code

New Development Checklist Measures	Project Consistency
	<p>Chapter 18-42 requires compliance with Tier 1 CALGreen standards.¹ The proposed project would implement required green building strategies to comply with Tier 1 CALGreen standards.</p> <p>Since the CAP adoption, the California Energy Commission (CEC) has determined that it is not possible to achieve net zero on a wholesale basis and “net zero” has been removed from the CA Energy Codes. Appendix E of the Climate Action Plan (CAP) states that, “To be in compliance with the CAP, all measures denoted with an asterisk are required in all new development projects unless otherwise specified. If a project cannot meet one or more of the mandatory requirements, substitutions may be made from other measures listed at the discretion of the Community Development Director.”</p> <p>CAP Goal 1.1 requires projects to comply with Tier 1 CALGreen requirements, as amended, for new nonresidential and residential development. Tier 1 CALGreen does not include “net zero” GHG assumptions for development. In addition, current CA Green Building Code Standards apply to all projects and has been determined by the Director to be an acceptable substitution for CAP Goal 1–1.1.3. Therefore, strict compliance with CAP Goal 1–1.1.3 is not achievable and not required. The City of Santa Rosa Ordinance Code Chapter 18-42 requires compliance with Tier 1 CALGreen standards, and the proposed project would be required to include Tier 1 CALGreen standards.</p>
1.3.1: Install real-time energy monitors to track energy use*	Complies. The proposed project would be built to comply with all regulations and would include Energy efficient smart “NEST” thermostats in each unit.
1.4.2: Comply with the City’s tree preservation ordinance*	Complies. As described in Section IV. Biological Resources Impact IV(e), project implementation would require removal of seven valley oak, two redwood, one cottonwood, and three ornamental trees. However, the proposed project would preserve eight trees. As the project is required to comply with the Santa Rosa City Code, which includes the Tree Ordinance, implementation of the project would not result in a conflict with the Tree Ordinance. In addition, the proposed project’s landscaping plan includes new plantings and trees, particularly along the project boundaries.
1.4.3: Provide public and private trees in compliance with the Zoning Code*	Complies. The proposed project would be required to comply with the City’s Zoning Code.
1.5: Install new sidewalks and paving with high solar reflectivity materials*	Complies. The proposed project would be required to construct paved areas in accordance with City standards.
2.1.3: Pre-wire and pre-plumb for solar thermal or photovoltaics (PV) systems	Complies. The proposed project would include solar photovoltaic systems for each unit.

New Development Checklist Measures	Project Consistency
3.1.2: Support implementation of station plans and corridor plans	Not Applicable. The project site is not located within the North Santa Rosa Station Area Specific Plan or the Downtown Station Area Plan. The proposed project would not impede the implementation of this nearby plan or any other station or corridor plan.
3.2.1: Provide on-site services such as ATMs or dry cleaning to site users	Not Applicable. This is a voluntary measure that is not proposed at this time. Furthermore, the proposed project is a residential development that would not include a commercial or mixed-use component.
3.2.2: Improve non-vehicular network to promote walking, biking	Complies. The proposed project would add sidewalks, walkways, and planter strips along project site frontages along Sebastopol Road and Brittain Lane to promote walking and connectivity to other land uses and the existing biking network.
3.2.3: Support mixed-use, higher-density development near services	Complies. The proposed project would include 82 townhomes adjacent to existing roadways and land uses that provide a wide range of services, including churches, medical care, schools, grocery stores, and restaurants.
3.3.1: Provide affordable housing near transit	Complies. The proposed project would be built to accommodate first time home buyers and young families according to the plan set submitted to the City. Although the proposed project would not be specifically low-income or very low-income housing, the site is located on Sebastopol Road, which is served by CityBus and several bus lines.
3.5.1: Unbundle parking from property cost	Not Applicable. This is a voluntary measure that is not proposed at this time.
3.6.1: Install calming features to improve pedestrian/bike experience	Not Applicable. This is a voluntary measure that is not proposed at this time.
4.1.1: Implement the Bicycle and Pedestrian Master Plan	Complies. Based on the City of Santa Rosa's Bicycle and Pedestrian Master Plan Update, 2018, the City is proposing a Class II bike lane along Sebastopol Road west of Corporate Center Parkway and extending to the Joe Rodota Trail. The proposed project would construct the portion of the Class II bike lanes along the proposed project's frontage.
4.1.3: Provide bicycle safety training to residents, employees, motorists	Not Applicable. This is a voluntary measure that is not proposed at this time.
4.2.2: Provide safe spaces to wait for bus arrival	Not Applicable. There is not a bus stop or public transit stop on the project site frontage or proposed as part of the project.
4.3.2: Work with large employers to provide rideshare programs	Not Applicable. The proposed project would be residential and would not include employment.
4.3.3: Consider expanding employee programs promoting transit use	

New Development Checklist Measures	Project Consistency
4.3.4: Provide awards for employee use of alternative commute options	
4.3.5: Encourage new employers of 50+ to provide subsidized transit passes*	Not Applicable. The proposed project would be residential and would not result in any job creation, this measure would not apply.
4.3.7: Provide space for additional park-and-ride lots	Not Applicable. This is a voluntary measure that is not proposed at this time.
4.5.1: Include facilities for employees that promote telecommuting	Not Applicable. The proposed project would be residential and would not include employment
5.1.2: Install electric vehicle charging equipment	Complies. Each residential unit would include EV chargers and wiring in the garage.
5.2.1: Provide alternative fuels at new refueling stations*	Not Applicable. The proposed project would not include refueling stations.
6.1.3: Increase diversion of construction waste*	Complies. The proposed project would be required to comply with existing regulations and conditions of the grading and construction permits.
7.1.1: Reduce potable water use for outdoor landscaping*	Complies. The proposed project would include an automatic irrigation system that would irrigate all landscaped areas with a weather system override in order to adjust the amount of water that is delivered. This system would measure evapotranspiration and be designed to irrigate each hydrozone independently in order to minimize water waste conform to the City's Water Efficient Landscape Ordinance (WELO) and other outdoor water efficiency requirements.
7.1.3: Use water meters which track real-time water use*	Complies. The proposed project would include an automatic irrigation system that would irrigate all landscaped areas with a weather system override in order to adjust the amount of water that is delivered. This system would measure evapotranspiration and be designed to irrigate each hydrozone independently in order to minimize water waste conform to the City's WELO and other outdoor water efficiency requirements.
7.3.2: Meet on-site meter separation requirements in locations with current or future recycled water capabilities*	Not Applicable. The proposed project is not located in an area with meter separation requirements. If applicable, the proposed project would comply with this measure.
8.1.3: Establish community gardens and urban farms	Not Applicable. This is a voluntary measure that is not proposed at this time.
9.1.2: Provide outdoor electrical outlets for charging lawn equipment	Complies. The proposed project would include electrical outlets for charging lawn equipment.
9.1.3: Install low water use landscapes*	Complies. The proposed project would conform to the City's WELO, which requires low water use landscape designs consistent with all aspects of the City of Santa

New Development Checklist Measures	Project Consistency
	Rosa Water Efficiency Landscape Ordinance (Chapter 14-30).
9.2.1: Minimize construction equipment idling time to 5 minutes or less*	Complies. The proposed project would ensure that construction equipment idling time is minimized to 5 minutes or less. As required by adopted Specific Plan MM 3.3.3, signage would be posted at the project site throughout the duration of the construction period with idling restrictions clearly stated.
9.2.2: Maintain construction equipment per manufacturer's specs*	Complies. The proposed project would maintain construction equipment per manufacturer's specs.
9.2.3: Limit GHG construction equipment emissions by using electrified equipment or alternative fuels*	Complies. Emissions from the use of construction equipment would be limited through the use of electrified equipment or alternative fuels. Specifically, the following measures, would be applied during construction of project and have been included as part of the proposed project as project design features: a) Substitute electrified equipment for diesel and gasoline powered equipment where practical. b) Use alternative fuels for construction equipment on-site, where feasible, such as compressed natural gas, liquefied natural gas, propane, or biodiesel. c) Avoid the use of on-site generators by connecting to grid electricity or utilizing solar-powered equipment.
<p>Notes:</p> <p>* Measures denoted with an asterisk are required in all new development projects.</p> <p>Source of policy and project requirements:</p> <p>¹ City of Santa Rosa. 2021. Santa Rosa City Ordinance Code Chapter 18-42. Website: https://srcity.org/3228/Local-Code-Amendments. Accessed June 3, 2022.</p> <p>² California Energy Commission (CEC). 2019. Building Energy Efficiency Standards—Title 24. Website: https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards. Accessed June 3, 2022.</p> <p>³ City of Santa Rosa. 2017. Santa Rosa City Code Chapter 17-24. Website: http://qcode.us/codes/santarosa/view.php?topic=17-17_24&showAll=1&frames=on. Accessed June 3, 2022.</p> <p>⁴ City of Santa Rosa. 2019. Santa Rosa Municipal Code, Chapter 20-36.090. Website: http://qcode.us/codes/santarosa/view.php?topic=20-3-20_36-20_36_090&highlightWords=bicycle+parking. Accessed June 3, 2022.</p> <p>⁵ City of Santa Rosa. 2019. Santa Rosa City Code, Chapter 14-30 Water Efficient Landscape. Website: https://qcode.us/codes/santarosa/. Accessed June 3, 2022.</p> <p>⁶ City of Santa Rosa. 2019. 4.10 North Santa Rosa Station Area Specific Plan. Website: https://srcity.org/DocumentCenter/View/3047/Design-Guidelines-410-North-Santa-Rosa-Station-Area-Specific-Plan-PDF. Accessed June 3, 2022.</p> <p>⁷ City of Santa Rosa. 2012. City of Santa Rosa Climate Action Plan, Appendix B: CAP New Development Checklist. Website: https://srcity.org/DocumentCenter/View/10762. Accessed June 3, 2022.</p>	

As shown in Table 15, the proposed project would be consistent with the City of Santa Rosa CAP, which is a Qualified GHG Emissions Reduction Strategy as defined by the BAAQMD and was developed to comply with the requirements of AB 32 and achieve the goals of the AB 32 Scoping Plan as well as post-2020 GHG reduction targets. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to greenhouse gas emissions. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
IX. Hazards and Hazardous Materials <i>Would the project:</i>					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant impact.	No	No	No	None
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?	Less than significant impact.	No	No	No	None
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than significant impact.	No	No	No	None
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?	Less than significant impact with mitigation incorporated.	No	No	No	MM 3.8.4a; MM 3.8.4b
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	No impact.	No	No	No	None

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
in a safety hazard or excessive noise for people residing or working in the project area?					
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than significant impact.	No	No	No	None
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	No impact.	No	No	No	None

Discussion

Consistent with adopted MM 3.8.4a, included in the previous EIR, a Phase I Environmental Site Assessment (Phase I ESA) was prepared for the proposed project by Stantec Consulting Services, Inc. (Stantec), dated June 10, 2021 (Appendix E). The Phase I was conducted in conformance with the requirements of American Society of Testing and Materials (ASTM) International Designation E 1527-12, and All Appropriate Inquiries (AAI) as defined by the EPA. Stantec gathered information from interview, review of existing data, and site reconnaissance to determine whether Recognized Environmental Conditions (RECs) are present at the project site. According to database searches, the project site was identified as “Silva’s Garage” in the HIST UST, State Water Efficiency and Enhancement Program (SWEET) UST, and California Facility Inventory Database (CA FID) UST environmental databases. These listings were related to a 500-gallon leaded fuel underground storage tank (UST) that was installed in 1974. No additional information regarding the UST was provided by Stantec or available online. According to the Phase I ESA, the following RECs are present on-site:

- Auto Repair and Petroleum Storage. Stantec observed evidence of auto repair (i.e., Outlaw Customs and Classics) and petroleum/chemical storage including unlabeled 55-gallon drums which are considered a RECs to the project site.
- Former Underground Storage Tank. Given the lack of closure information, the former 500-gallon UST is considered a REC.

In addition, Stantec identified two non-ASTM issues at the project site. A water well was observed north of the residential structure and associated storage shed. The water well is not considered an environmental concern to the project site; however, the well will need to be abandoned in accordance with regulatory requirements. Additionally, given the age of the existing buildings at the project site (circa 1952), the presence of asbestos-containing material (ACM) and lead-based paint (LBP) is considered possible. Thus, the Phase I ESA recommends that a comprehensive, pre-demolition ACM survey be conducted in accordance with the sampling protocol of the Asbestos Hazard Emergency Response Act (AHERA) prior to any activities with the potential to disturb building materials to determine whether ACM are present. Further, in the event ACM is detected, Stantec recommends proper removal and disposal of the materials identified prior to any activities with the potential to disturb them.

Given the findings contained in the Phase I ESA, Stantec recommends collecting soil and soil vapor samples to evaluate potential impacts to the subsurface beneath the project site. As such, to investigate the RECs at the project site, a Phase II ESA was prepared by Stantec, dated March 29, 2022 (Appendix E). According to the Phase II ESA, Stantec collect soil samples and were submitted for analysis. The Phase II ESA concluded that auto service operations and former UST are no longer considered a REC and do not represent a human health risk concern in contemplation of the proposed residential development of the project site. Stantec recommends no further action or investigation regarding the environmental condition of the project site.

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR identifies that the use, storage, and transport of hazardous materials by developers, contractors, business owners, and others are required to be in compliance with local, State, and federal regulations during buildout construction and operation. Additionally, facilities that use hazardous materials are required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases. The previous EIR determined that development associated with buildout would be required to comply with federal, State, and local regulations regarding the handling, transport, disposal, and cleanup of hazardous materials. Considering the level of protection afforded by the various requirements, restrictions, and policies enforced by agencies with jurisdiction over the use, storage, or disposal of hazardous materials within the project area, the previous EIR concluded that the release of hazardous materials is unlikely. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

Construction activities associated with the proposed project could include the use of limited quantities of hazardous substances. The proposed project consists of the development of 82 residential dwelling units. Residential uses are not large quantity users of hazardous materials and, thus, would not have the potential to expose human health or the environment to hazards associated with releases of those materials. Consistent with the previous EIR, transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, State, and local regulations to ensure

that human health and the environment are not exposed to hazardous materials. Further, consistent with adopted Specific Plan MM 3.8.4a, Phase I and Phase II ESAs were conducted for the proposed project and concluded that there are no longer RECs at the project site. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would include uses that would require the routine use of hazardous materials. Existing local, State, and federal regulations regarding the appropriate, legal use, storage, and disposal of hazardous materials associated with household and commercial uses provide extensive regulatory oversight for the use and handling of hazardous materials and would ensure that the potential for accidental release of hazardous materials into the environment is less than significant. Further, all future development would be required to comply with General Plan Policies NS-F-1 through NS-F-6, which are aimed at reducing the risk from accidental release of chemicals, waste, or other hazardous materials, and Policy NS-F-4, which specifically addresses the accidental release of hazardous materials. Additionally, any development that creates or replaces a combined total of 10,000 square feet or more of impervious surface is required to develop an SWPPP, Which would prevent runoff from discharging into site waterways from dumpsters, maintenance areas, and other areas where potentially hazardous or hazardous materials are stored or used. Therefore, the potential for the accidental release of hazardous materials into the environment is considered less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units. The proposed project is entirely residential, and the use of hazardous materials and substances upon project occupancy would be limited to routine amounts of cleaning solvents, fertilizers, pesticides, and other substances used in landscaping. Residential uses are not large quantity users of hazardous materials and, thus, would not have the potential to create risk of upset conditions associated with releases of those materials. Additionally, consistent with adopted Specific Plan MM 3.8.4a, Phase I and Phase II ESAs were conducted for the proposed project and concluded that there are no longer any RECs at the project site. Furthermore, the proposed project would comply with the General Plan and develop an SWPPP. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

Several schools are located within and in the vicinity of the Specific Plan area. Construction activities associated with future development under the proposed project could result in hazardous emissions (i.e., heavy equipment diesel exhaust) or handling of hazardous materials, substances, or waste (i.e., construction materials) within 0.25 mile of these schools. However, the previous EIR concluded that buildout would not expose schools to hazardous

emissions or materials because there would be no net increase in industrial or commercial acreage. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units. The closest school to the project site is Lawrence Cook Middle School which is located approximately 0.22 miles southeast of the project site. J.X. Wilson Elementary School, which is located approximately 0.31 miles north, is also in close proximity to the project site. Thus, the proposed project is located within 0.25 miles of a school. However, residential uses are not large quantity users of hazardous materials and, thus, would not have the potential to expose schools to hazardous air emissions or materials. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that there are over 30 known open case hazardous materials sites located in the Specific Plan area, including sites included on the Cortese List (pursuant to Government Code Section 65962.5), as well as cases determined by North Coast RWQCB and/or the California Department of Toxic Substances Control (DTSC) to be closed, inactive, or no further action. The previous EIR concluded that buildout may result in development occurring on sites listed on the Cortese List. The previous EIR set forth MM 3.8.4a and MM 3.8.4b, which require assessment and remediation of Cortese List sites and implementation of inadvertent discovery procedures if previously unknown hazardous materials are encountered during ground-disturbing activities. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

According to the Phase I ESA, a review of the Cortese List found that the project site is not listed on the Cortese List, but there are four Cortese sites within approximately 0.5 miles of the project site. However, all four sites are considered closed. Additionally, as discussed above, a Phase II ESA was prepared, which included soil and soil vapor testing for petroleum hydrocarbons and VOCs, consistent with the previous EIR's adopted MM 3.8.4a. All test results were below the adopted thresholds and, thus, no further action is required. Although the Phase I and II ESAs thoroughly assessed the site, the previous EIR's adopted MM 3.8.4b would be implemented in the unlikely event undiscovered hazardous materials are encountered. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

e) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not expose persons or residing in the project area to aviation hazards because the nearest airport, Charles M. Schulz—Sonoma County Airport, is more than 5 miles to the north. Therefore, no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The project site is 5 miles south of Charles M. Schulz – Sonoma County Airport and is not within the boundaries of an adopted airport land use plan. Thus, it would not expose persons residing or working within 2 miles of an airport to aviation hazards. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

f) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The City's Draft Emergency Operations Plan (EOP) provides a blueprint for emergency management in the City in the case of a major earthquake, hazardous materials incident, flood, national security emergency, wildfire, landslide, dam failure, or other emergency. The EOP guides the City's response to an emergency in four phases: preparedness, response, recovery, and mitigation. The previous EIR concluded that the Santa Rosa Fire Department (SRFD) would review construction plans for roadway modifications in the project area and would establish temporary alternative emergency routes necessary for the duration of a construction project. During design review of subsequent projects, the City would ensure that roads and driveways are designed and constructed to meet City standards as well as California Fire Code requirements for emergency access. The SRFD would also review building plans for compliance with the Fire Code and establish a future inspection schedule for continuing compliance. Thus, the previous EIR concluded that buildout would not impair emergency response or evacuation because new development would be reviewed for compliance with applicable Fire Code standards. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would obtain vehicular access from one point on Sebastopol Road and two points on Brittain Lane. Thus, it would meet California Fire Code emergency access requirements. Further, the proposed project does not propose any permanent lane closures or obstructions that could impede emergency response to or from the project site from the surrounding streets. The proposed project would replace the existing uses at the site with an additional network of internal streets that would increase circulation in the area, and therefore, increasing potential emergency vehicle access and evacuation routes. Moreover, the proposed project would undergo design review, which would ensure that the proposed project's internal roadways are designed and constructed to meet City standards as well as California Fire Code requirements for emergency access. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

g) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not increase exposure to wildland fires because the project area is urban in nature and does not abut areas susceptible to wildland fires. Therefore, no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The project site is surrounded on four sides by urban development and infrastructure. Thus, it is not susceptible to wildland fires. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

The following approved mitigation measures are required for all development projects within the Specific Plan planning area, which includes the proposed project.

MM 3.8.4a Phase I Environmental Site Assessment. Developers shall be required to complete a Phase I Environmental Site Assessment for each property to be developed or redeveloped. If a REC is identified in a Phase I Environmental Site Assessment, a Phase II environmental site assessment shall be prepared to determine whether conditions are present that require remediation or other controls to minimize the potential for hazardous materials contamination to adversely affect public health and the environment. If remediation is required, developers shall complete site remediation in accordance with OSHA standards and Santa Rosa Fire Department, Sonoma County Environmental Health Department, and State Water Resources Control Board guidelines. The California DTSC may become involved wherever toxic levels of contaminants are found that pose an immediate hazard. Remediation shall reduce human exposure risk and environmental hazards, both during and after construction. The remediation plan shall be prepared in accordance with the environmental consultant's recommendations and established procedures for safe remediation. Specific mitigation measures designed to protect human health and the environment will be provided in the plan. Requirements shall include but not be limited to the following:

- Documentation of the extent of previous environmental investigation and remediation at the site, including closure reports for USTs and contaminant concentrations.
- A site-specific health and safety plan to be prepared by all contractors at the project site, where applicable. This includes a plan for all demolition, grading, and excavation on the site, as well as for future subsurface maintenance work. The plan shall include appropriate training, any required personal protective equipment, and monitoring of contaminants to determine exposure. The Health and Safety Plan shall be reviewed and approved by a certified industrial hygienist.
- Description of protocols for the investigation and evaluation of previously unidentified hazardous materials that could be encountered during project development, including engineering controls that may be required to reduce exposure to construction workers and future users of the site.
- Requirements for site-specific construction techniques that would minimize exposure to any subsurface contamination, where applicable, which shall include treatment and disposal measures for any contaminated groundwater removed from excavations, trenches, and dewatering systems in accordance with local and Regional Water Quality Control Board guidelines.

- Sampling and testing plan for excavated soils to determine suitability for reuse or acceptability for disposal at a State licensed landfill facility.
- Restrictions limiting future excavation or development of the subsurface by residents and visitors to the proposed development, and prohibition of groundwater development should it be determined from test results that contamination is present. The restrictions would be developed based on-site specific conditions and would reflect the requirements of the RWQCB and/or DTSC, depending on which agency is responsible for oversight of the particular site. Restrictions, which are sometimes also referred to as land use covenants, shall be recorded with the parcel(s), shall run with the land. The developer or landowner successor(s)-in-interest shall be responsible for ensuring development complies with the restrictions. Compliance with the restrictions must be demonstrated to the satisfaction of the City before a grading permit is issued.
- Completion of an approved remediation plan should land use restrictions be insufficient to allow development to proceed safely. Remediation measures may include excavation and replacement of contaminated soil with clean fill, pumping and treatment of groundwater, thermal treatment, etc.

MM 3.8.4b In the event previously unknown contaminated soil, groundwater, or subsurface features are encountered or have the potential be present during ground-disturbing activities at any site, work shall cease immediately, and the developer's contractor shall notify the City of Santa Rosa Fire Department for further instruction. The City shall ensure any grading or improvement plan or building permit includes a statement specifying that if hazardous materials contamination is discovered or suspected during construction activities, all work shall stop immediately until the City of Santa Rosa Fire Department has determined an appropriate course of action. Such actions may include, but would not be limited to, site investigation, human health and environmental risk assessment, implementation of a health and safety plan, and remediation and/or site management controls. The City of Santa Rosa Fire Department shall be responsible for notifying the appropriate regulatory agencies and providing evidence to the City Planning and Economic Development Department that potential risks have been mitigated to the extent required by regulatory agencies. Work shall not recommence on an impacted site until the applicable regulatory agency has determined further work would not pose an unacceptable human health or environmental risk. Deed restrictions may be required as provided under mitigation measure MM 3.8.4a.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to hazards and hazardous materials. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
X. Hydrology and Water Quality <i>Would the project:</i>					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than significant impact.	No	No	No	None
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than significant impact.	No	No	No	None
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	Less than significant impact.	No	No	No	None
(i) result in substantial erosion or siltation on- or off-site;	Less than significant impact.	No	No	No	None
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	Less than significant impact.	No	No	No	None
(iii) create or contribute runoff water which would exceed the capacity of existing or planned	Less than significant impact.	No	No	No	None

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
stormwater drainage systems or provide substantial additional sources of polluted runoff; or					
(iv) impede or redirect flood flows?	Less than significant impact.	No	No	No	None
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than significant impact.	No	No	No	None
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that construction activities associated with buildout that involve grading, excavation, or trenching could temporarily disturb soils, resulting in potential sediment transport to Roseland and Colgan creeks. Other pollutants, such as nutrients, trace metals, and hydrocarbons, could attach to sediment and be transported to downstream locations. Sediment-associated pollutants could also cause or contribute to degradation of surface water quality. The delivery, handling, and storage of construction materials and wastes, as well as the use of construction equipment containing fuel, oil, and grease, could also introduce a risk for contamination that could impact surface water or groundwater quality as result of spills or leaks from heavy equipment and machinery. These construction activities could impact surface water and groundwater quality in a manner that could lead to violations of water quality standards if controls are not in place to minimize potential impacts. However, the previous EIR concluded that every subsequent project under the Specific Plan would be subject to a General Construction Permit and be required to develop and implement an SWPPP, which must include erosion control/soil stabilization techniques, BMPs for preventing the discharge of construction-related pollutants, drainage facility inspections, monitoring and maintenance programs, and training and information programs. Further, all projects greater than 1 acre must comply the National Pollution Discharge Elimination System (NPDES)

Construction General Permit. Additionally, the City requires developers to prepare and implement the requirements set forth in the Storm Water Low Impact Development Technical Design Manual (LID Manual), pursuant to NPDES Municipal Separate Storm Sewer System (MS4) Permit requirements. As the area is gradually built out consistent with the LID Manual, the water quality associated with stormwater runoff would gradually be expected to improve compared to existing conditions. Incorporation of the LID Manual requirements into new projects would be reviewed by City staff in conjunction with issuance of grading and/or building permits. Thus, the previous EIR concluded that buildout would not result in the degradation of water quality because new development would be required to implement a SWPPP during construction and implement LID concepts in the storm drainage systems. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would involve ground-disturbing activities including grading and trenching. Thus, development of the proposed project may result in pollution in downstream waterways. In accordance with State law and local ordinances, the proposed project would be required to comply with the applicable stormwater pollution prevention regulations, which would serve to abate any hazards. As discussed above, the project would be required to comply with the General Construction Permit and the NPDES Construction Permit and would develop and implement a SWPPP. Additionally, the proposed project would implement LID measures, which are systems and practices that use or mimic natural processes that result in the infiltration, evapotranspiration, or use of stormwater in order to protect water quality. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

All future projects developed under the Specific Plan would use municipal water sources, which would include the use of groundwater. The previous EIR determined there would be adequate supply to meet existing demands and planned future demands, and no new or expanded water entitlements would be required. Therefore, the previous EIR concluded that buildout would not deplete groundwater supplies because the City is anticipated to have surplus municipal water supply and that the project area's water demands are accounted for in the City's Urban Water Management Plan (UWMP). Further, the previous EIR determined that although buildout would introduce new impervious surfaces, most of the parcels in the Specific Plan area are planned for low-density residential and open space, which would allow continued on-site percolation of runoff. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 residential dwelling units on the project site. The project site is located within the RASRSP that was analyzed in the previous EIR, which concluded that buildout of the Specific Plan would not substantially deplete

groundwater supplies, interfere substantially with groundwater recharge, or result in groundwater contamination. Further, the City's UWMP accounts for the project site's demand in its water demand projections, which also forecast a surplus over the long term.

Additionally, implementation of LID principles would contribute to groundwater recharge. The proposed development would include 25 Priority 1 (P1-06) bioretention facilities, which consist of vegetated basins with 18 inches of engineered soil designed to filter contaminants from stormwater and encourage infiltration, throughout TA-1. Stormwater flows exceeding the required treatment and acceptable ponding depths in the bioretention facilities would be directed to a network of 12-inch and 15-inch storm drains that would eventually discharge to a larger 24-inch storm drain in the main project driveway. This 24-inch storm drain would convey overflows into a larger stormwater retention and infiltration facility located in a landscaped LID area inside of the site's southeastern corner via a network of storm drains. Runoff from the west side of Brittain Lane (TA-2) would receive treatment via four Priority 2 (P2-04) bioretention cells with curb-cut inlets. Similarly, runoff from the north side of Sebastopol Road (TA-3) would receive treatment via two Priority 2 (P2-04) vegetated swales with curb-cut inlets. Thus, the proposed project would not deplete groundwater supplies and would contribute to groundwater recharge. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c (i) Result in substantial erosion or siltation on- or off-site?

Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that buildout would generally be limited to vacant and underutilized parcels surrounded by existing development with established drainage patterns. Thus, buildout would not likely result in substantial alteration of existing drainage patterns. The previous EIR also identified General Plan Policies PSF-I-1 and PSF-I-3, which require dedication, improvement, and maintenance of stormwater flow and retention areas as a condition of approval, and implementation of erosion and sediment control measures to maintain an operational drainage system and preserve drainage capacity, as applicable to future development under the RASRSP. In addition, subsequent projects in the project area would need to demonstrate conformance with the applicable policies in the Santa Rosa Citywide Creek Master Plan, such as Policies SW-2-1 through SW-2-3, which require new development to comply with the City's NPDES stormwater permit and the Storm Water LID Manual, encourage the use of small-scale landscape-based LID BMPs over other BMPs, and require implementation of projects identified in the Master Plan as part of future stormwater offset projects where feasible. Thus, the previous EIR concluded that buildout would not alter drainage patterns such that substantial erosion would occur because of compliance with City standards for storm drainage. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project design includes a storm drainage system that is sized appropriately to address potential stormflows resulting from the project. In accordance with State law and local ordinances, the proposed storm drainage system would detain runoff and release at a rate no greater than the pre-development condition of the project site, which would avoid the potential for any increase in erosion in downstream waterways. As previously discussed, the proposed project includes 25 bioretention facilities throughout TA-1 for stormwater treatment and infiltration. Stormwater flows exceeding the acceptable ponding depths in the bioretention facilities would be directed to a larger stormwater retention and infiltration facility located in a landscaped area inside of the site's southeastern corner via a network of storm drains. Runoff from TA-2 would receive treatment via four bioretention cells with curb-cut inlets. Similarly, runoff from TA-3 would receive treatment via two vegetated swales with curb-cut inlets.

The proposed project would be required to comply with General Plan Policies PSF-I-1 and PSF-I-3; the Santa Rosa Citywide Creek Master Plan, such as Policies SW-2-1 through SW-2-3; the City's NPDES stormwater permit; and the Storm Water LID Manual. Additionally, hydraulic modeling results for the proposed storm drain extension along Sebastopol Road and Brittain Lane indicated that all system components would satisfy conveyance and freeboard requirements set forth in the County's Flood Management Design Manual (2020) for the design 10-year storm. Coupled storm drain and overland flow modeling for the proposed project also showed that flood levels along Sebastopol Road during the design 100-year storm would be approximately 1.2 to 2.2 feet below the building pad elevations for the proposed project. Thus, the proposed project's finished floor elevations would lie approximately 3 feet or more above the estimated 100-year flood level.

Vector control issues present within the network of earthen drainage swales that currently parallel the north shoulder of Sebastopol Road would be improved by the proposed LID capture and treatment, the StormChamber retention and infiltration (clearance within 72 hours), and the installation of a new storm drain system. These design features would efficiently evacuate site runoff from the project site, Brittain Lane, and the developed parcel to the east of the project site.

The hydrograph analysis of StormChamber bypass flows during the 10-year design storm indicated that the 10-year site runoff would be evacuated in less than one hour. Therefore, barring significant obstruction of driveway culverts conveying drainage swale flows from the undeveloped parcels east of the Bayside Church parcel or the existing storm drain network west of Justin Drive, the treated and bypassed runoff from the project site would be drained within the 72 hours suggested for vector control. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c (ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that buildout could create the potential for flooding as a result of alteration of drainage patterns. However, the Specific Plan area is highly developed with a significant footprint of impervious surfaces (buildings, parking lots, and roadways). Thus, while existing drainage patterns may be altered, the previous EIR determined that stormwater would continue to be directed toward the City's network of storm drains and concluded that buildout would not alter drainage patterns such that substantial flooding would occur because of compliance with City standards for storm drainage. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project's storm drainage system is sized appropriately to accommodate potential storm flows and ensure that there would be no net increase in surface runoff. In accordance with State law and local ordinances, the proposed storm drainage system would detain runoff and release it at a rate no greater than the pre-development condition of the project site, which would avoid the potential for any downstream flooding hazards. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c (iii) 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?

Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

As discussed above, the previous EIR determined that development and land use activities contemplated by the Specific Plan would have the potential to create polluted runoff that could affect water quality. As previously discussed, compliance with General Plan Policies PSF-I-1 and PSF-I-3; Santa Rosa Citywide Creek Master Plan, such as Policies SW-2-1 through SW-2-3; the City's NPDES stormwater permit; and the Storm Water LID Manual are determined to be sufficient to reduce impacts associated with polluted runoff to a less than significant level. Thus, the previous EIR concluded that buildout would not alter drainage patterns such that substantial flooding or pollution would occur because of compliance with City standards for storm drainage. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

As discussed, the proposed storm drainage system would be sized appropriately to detain runoff and release it at a rate no greater than the pre-development condition of the project site. This would preclude the potential for exceedance of existing or planned storm drain

capacity. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c (iv) Impede or redirect flood flows?

Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR discusses that portions of the Specific Plan area are in Federal Emergency Management Agency (FEMA)-designated 100-year and 500-year flood hazard areas. General Plan Policy NS-D-6 requires the City to evaluate flood hazards prior to approval of development projects in FEMA-designated flood zones and to ensure that new development in such zones is designed to be protected from flooding. Citywide Creek Master Plan Policy SW-1-3 requires projects that would affect flood conveyance to provide a detailed hydraulic analysis prior to implementation. There are dams that have the potential to cause flooding in the project area, should a dam failure occur. As described above, implementation of Policy ND-D-6 would ensure new development is protected from flood hazards. Thus, the previous EIR concluded that buildout would not alter drainage patterns such that flood flows would be redirected because of compliance with City standards for storm drainage. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project site is not located within a 100-year Flood Zone as indicated by FEMA Flood Insurance Rate Map (FIRM) and does not contain any levees or dams, nor are any such facilities located upstream of the project site.³⁴ Furthermore, in accordance with City standards for storm drainage, the project proposes bioretention basins as part of a storm drainage system that would be capable of detaining runoff and releasing it at a rate no greater than the pre-development condition of the project site, which would ensure that project would not impede or redirect flood flows.

As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not increase exposure to 100-year flood hazards because new development that occurs these areas would be required to comply with City standards. As previously discussed, implementation of General Plan Policy ND-D-6 would ensure new development is protected from flood hazards. The previous EIR concluded that the

³⁴ Federal Emergency Management Agency (FEMA). 2008. Sonoma County, California and Incorporated Areas, Map Number 06097C0707E. Available: <https://map1.msc.fema.gov/firm?id=06097C0707E>. Accessed June 7, 2022.

project area is not located in an area subject to tsunami, seiche, sea level rise effects, or mudflow. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

According to the FEMA FIRM, the project site is not located within a 100-year flood hazard area. Thus, it would not expose persons or structures to 100-year flood hazards.³⁵ Additionally, as discussed in the previous EIR, the project site is not located in an area subject to tsunami, seiche, sea level rise effects, or mudflow. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

e) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not conflict with a groundwater management plan because the City is anticipated to have surplus municipal water supply and that the project area's water demands are accounted for in the City's UWMP. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units on the project site. The City's UWMP accounts for the project site's demand in its water demand projections, which also forecast a surplus over the long term. Thus, the proposed project would not conflict with a groundwater management plan. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to hydrology and water quality. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

³⁵ Federal Emergency Management Agency (FEMA). 2008. Sonoma County, California and Incorporated Areas, Map Number 06097C0707E. Available: <https://map1.msc.fema.gov/firm?id=06097C0707E>. Accessed June 7, 2022.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XI. Land Use and Planning <i>Would the project:</i>					
a) Physically divide an established community?	Less than significant impact.	No	No	No	None
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that the actions contemplated by the RASRSP would create a more cohesive and connected community while preserving existing uses and the unique character of the area. The previous EIR concluded that buildout would not divide an established community because the Specific Plan does not contemplate any development activities that would divide land uses. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The majority of the project site is currently vacant with one single-family home and associated outbuildings that front Sebastopol Road in the southeast corner of the project site. The site also contains one single-story building occupied by Outlaws Customs and Classics in the southwest corner. The proposed project would result in the development of 82 dwelling units on the project site. Although the existing dwelling units would be removed, their removal would not constitute the division of an established community because they would be replaced with residential dwelling units that are consistent with the project site's zoning and General Plan designation and with surrounding residential land uses. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not conflict with the General Plan or City Code because of corresponding amendments that would achieve consistency with both planning documents. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The majority of the project site is currently vacant with one single-family home and associated outbuildings that front Sebastopol Road in the southeast corner of the project site. The site also contains one single-story building occupied by Outlaws Customs and Classics in the southwest corner. The proposed project would result in the development of 82 dwelling units. The project site is designated Medium Density Residential by the General Plan and zoned Multi-Family Residential (R-3-18) by the Specific Plan. The proposed project's residential uses are allowable with both the General Plan and zoning. Additionally, the project's density (14.3 dwelling units/acre) is within the 8 to 18 units per acre range allowed by the General Plan and zoning. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to land use and planning. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XII. Mineral Resources <i>Would the project:</i>					
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?	No impact.	No	No	No	None
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?	No impact.	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not result in the loss of mineral resources of statewide importance because of the absence of such resources in the project area. Therefore, no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The project site does not support mineral extraction activities. Thus, the development of the proposed project would not result in loss of mineral resources of statewide importance. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not result in the loss of mineral resources of local importance because of the absence of such resources in the project area. Therefore, no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The project site does not support mineral extraction activities. Thus, the development of the proposed project would not result in loss of mineral resources of local importance. As such,

the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to mineral resources. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIII. Noise <i>Would the project:</i>					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than significant impact.	No	No	No	None
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	Less than significant impact.	No	No	No	None
c) For a project located within the vicinity of a private airstrip or 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?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of 2016 Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation

The previous EIR determined that the implementation of the Specific Plan would not exposure residents to traffic or stationary sources of noise in excess of established standards.

However, the previous EIR determined that construction activities could cause a substantial temporary increase in ambient noise levels at nearby noise-sensitive land uses, which may result in increased levels of annoyance, activity interference, and sleep disruption. As a standard condition of development approval, the City requires the implementation of BMPs for the control of construction-generated noise levels. Commonly applied BMPs in Santa Rosa

include limiting noise-generating construction activities to the less noise-sensitive hours of the day, prohibiting idling of heavy-duty off-road equipment when not in use, and ensuring that construction equipment is properly maintained and equipped with noise reduction intake and exhaust mufflers and shrouds, in accordance with manufacturers' recommendations. Implementation of these BMPs would minimize potential impacts to nearby noise-sensitive land uses. Therefore, this impact would be considered less than significant.

Brittain Lane Project Analysis and Conclusions

Short-term Construction Impacts

Reasonable worst-case combined noise level during the loudest phase of construction would be maximum noise levels of 90 dBA maximum noise/sound level (L_{\max}), and an hourly average of 86 dBA equivalent sound level or equivalent continuous sound level (L_{eq}), as measured at a distance of 50 feet from the acoustic center of a construction area.

The nearest sensitive noise receptor to the project site is a single-family home located approximately 25 feet north of the project site on Brittain Lane. At this distance reasonable worst-case construction noise levels would range up to 86 dBA L_{eq} when multiple pieces of construction equipment operate simultaneously near the project boundary. These noise levels could occur temporarily under the reasonable worst-case scenario of multiple pieces of heavy construction equipment operating simultaneously in relatively the same locations at the nearest project boundary for an hour period. These noise levels would attenuate at a rate of 6 dBA per doubling of the distance from the receptor as the equipment move and operate over other portions of the project site.

Although there could be a relatively high single event noise exposure potential causing an intermittent noise nuisance, the effect of construction activities on longer-term (hourly or daily) ambient noise levels would be small but could result in a temporary increase in ambient noise levels in the project vicinity that could result in annoyance or sleep disturbance of nearby sensitive receptors. As noted previously, the City has established standard conditions of development approval that including limiting hours of construction to 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays; no construction is permitted on Sundays and holidays. The proposed project will comply with this restriction of construction activities to these stated time-periods which would ensure that construction noise would not result in a substantial temporary increase in ambient noise levels that would result in annoyance or sleep disturbance of nearby sensitive receptors. Construction-related traffic noise and construction equipment operation noise would therefore be less than significant. This finding is consistent with the findings of the previous EIR.

Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts related to construction noise beyond what was previously analyzed in the previous EIR. No additional analysis is required.

Operational/Mobile Source Noise Impacts

A significant impact would occur if project-generated traffic would result in a substantial increase in ambient noise levels compared with those that would exist without the project. The City does not define “substantial increase” for mobile noise sources. Therefore, for purpose of this analysis, a substantial increase is based on the following criteria. As noted in the characteristics of noise discussion, audible increases in noise levels generally refer to a change of 3 dBA or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. A change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments. Therefore, a significant impact would occur if the project would cause the L_{dn} to increase by any of the following:

- 5 dBA or more even if the L_{dn} would remain below normally acceptable levels for a receiving land use.
- 3 dBA or more, thereby causing the L_{dn} in the project vicinity to exceed normally acceptable levels and result in noise levels that would be considered conditionally acceptable for a receiving land use.
- 1.5 dBA or more where the L_{dn} currently exceeds conditionally acceptable levels.

A characteristic of noise is that a doubling of sound sources with equal strength is required to result in a perceptible increase (defined to be a 3 dBA or greater) in noise levels. Based on the turning volume data contained in the Preliminary Transportation Impact Study (TIS) prepared by W-Trans, dated May 27, 2022, existing traffic volumes average 2,850 during the PM peak-hour on Sebastopol Road adjacent to the project site. The proposed project would generate less than 50 peak-hour trips. As a result, the project would not result in a doubling of traffic volumes on adjacent roadway segments and would result an increase of less than 1 dBA above existing traffic noise levels. Therefore, project-related traffic noise levels would not result in a substantial permanent increase in traffic noise levels in excess of applicable standards and would represent a less than significant impact.

Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts related to traffic noise beyond what was previously analyzed in the previous EIR. No additional analysis is required.

Operational/Stationary Source Noise Impacts

Similar to the previous EIR, the proposed project would result in development that could result in potential stationary noise impacts from proposed mechanical ventilation equipment operation.

Operational noise levels from typical market available residential mechanical ventilation equipment range from 50 dBA to 70 dBA L_{eq} at a distance of 3 feet. The nearest sensitive noise receptor to the project site is a single-family home located approximately 40 feet north of the project site. At this distance, reasonable worst-case noise levels generated by new mechanical ventilation equipment operations would attenuate to below 48 dBA L_{eq} . These noise levels are similar to the noise levels generated by existing mechanical ventilation systems in the project

vicinity and would not be audible over background ambient noise levels as measured at this nearest sensitive receptor. Therefore, similar to the findings of the previous EIR, implementation of the proposed project would not result in a substantial permanent increase in noise levels from new stationary noise sources and the impact would be less than significant.

Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts related to stationary noise sources beyond what was previously analyzed in the previous EIR. No additional analysis is required.

b) Summary of 2016 Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation

The previous EIR determined that this vibration impacts would be considered less than significant during construction and operation of the proposed project.

Brittain Lane Project Analysis and Conclusions

Similar to the previous EIR, the proposed project construction activities could result in ground-borne vibration impacts to existing structures located in the vicinity of the plan area.

The nearest off-site structure to the project construction footprint where the heaviest equipment would operate is the single-family home north of the project site. Of the variety of equipment used during construction, the large vibratory rollers that are anticipated to be used in the site preparation phase of construction would produce the greatest ground-borne vibration levels. Large vibratory rollers produce ground-borne vibration levels ranging up to 0.201 inch per second (in/sec) peak particle velocity (PPV) at 25 feet from the operating equipment. The façade of this closest structure would be located at 90 feet from the nearest interior roadway where the heaviest construction equipment would potentially operate on-site during construction of the project. At this distance, ground-borne vibration levels would range up to 0.03 PPV from operation of the types of equipment that would produce the highest vibration levels. This is below the Federal Transit Administration's (FTA's) Construction Vibration Impact Criteria³⁶ of 0.2 in/sec PPV for this type of structure, a building of non-engineered timber and masonry construction. Therefore, the impact of short-term ground-borne vibration associated with construction to off-site receptors would be less than significant.

Therefore, the proposed project would not introduce new environmental impacts or create more severe construction-related vibration impacts beyond what was previously analyzed in the previous EIR. No additionally analysis is required.

Operational Vibration Impacts

Anticipated development that would occur in the plan area would not include any permanent sources of vibration that would expose persons in the plan area to ground-borne vibration levels that could be perceptible without instruments at any receiving property adjacent to the project site.

³⁶ Federal Transit Administration (FTA). 2018. Transit Noise and Vibration Impact Assessment Manual. September.

Therefore, the proposed project would not introduce new environmental impacts or create more severe operational ground-borne vibration impacts beyond what was previously analyzed in the previous EIR. No additional analysis is required.

c) Summary of 2016 Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation

The previous EIR did not identify any impacts related to the project's potential to airport land uses and private air strip proximity.

Brittain Lane Project Analysis and Conclusions

The proposed project would be within the boundaries of development anticipated in the previous EIR. The nearest public airport to the plan area is the Sonoma County Airport, located approximately 5 miles north of the plan area. The plan area is located well outside of the 65 dBA CNEL airport noise contours of this closest airport. Therefore, implementation of the project would not expose persons residing or working in the project vicinity to noise levels from airport activity that would be in excess of normally acceptable standards for the proposed land use development, and no impact would occur.

Therefore, the proposed project would not introduce new environmental impacts or create more severe impacts related to airport noise beyond what was analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to noise. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIV. Population and Housing <i>Would the project:</i>					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than significant impact.	No	No	No	None
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that buildout would result in an increase in 3,702 residential units and would cause population growth at a rate of 2.61 persons per household, resulting in approximately 9,662 net new residents. However, the previous EIR concluded that while buildout of the project area would include the development of a substantial number of new residential units that would increase the City's overall population, the buildout would not cause population growth in excess of the General Plan's growth projections and, thus, would not be growth inducing. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would develop 82 dwelling units that would be consistent with the zoning and General Plan designation of the site. Further, the project is within the RASRSP area, which contemplated the development of 3,691 dwelling units; thus, the amount of residential growth generated by the proposed project is within City growth projections. Furthermore, the project site is located within an urbanized area of Santa Rosa and is served with infrastructure. Thus, it would not remove a physical barrier to growth. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout may result in some dwelling units being removed, there would be no net decrease in dwelling units such that substantial populations of people would be displaced. Therefore, impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would develop 82 dwelling units on the project site, resulting in a net increase of 81 dwelling units as the current tenants of the single-family home will vacate the existing residential structure on the project site. As such, the proposed project would not displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere. The proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to population and housing. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XV. Public Services <i>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:</i>					
a) Fire protection?	Less than significant impact.	No	No	No	None
b) Police protection?	Less than significant impact.	No	No	No	None
c) Schools?	Less than significant impact.	No	No	No	None
d) Parks?	Less than significant impact.	No	No	No	None
e) Other public facilities?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The majority of the project area is currently served by the Santa Rosa Fire Department (SRFD). The previous EIR concluded that buildout would not result in a need for new or expanded fire protection facilities because the project area is currently served with adequate fire protection and new development would occur incrementally and thus, not result in a sudden increase in demand for service. Therefore, impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units, which would be within the Specific Plan's buildout projections, and thus, would not increase demand for fire protection beyond previously anticipated levels. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The majority of the project area is currently served by the Santa Rosa Police Department (SRPD). The unincorporated islands in the project area are currently served by the Sonoma County Sheriff's Office and the California Highway Patrol; upon annexation, these areas would be primarily served by the SRPD. The previous EIR concluded that buildout would not result in a need for new or expanded police protection facilities because the project area is currently served with adequate police protection and new development would occur incrementally, and thus, not result in a sudden increase in demand for service. Therefore, impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units, which would be within the Specific Plan's buildout projections, and thus, would not increase demand for police protection beyond previously anticipated levels. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not result in a need for new or expanded school facilities because the residential uses would only add 44 additional students to K-12 schools. Therefore, impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units, which would be within the Specific Plan's buildout projections and, thus, would not increase demand for schools beyond previously anticipated levels. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not result in a need for new or expanded park facilities because the City currently exceeds its parkland/resident ratio of 3.5 acres per 1,000 residents and also has plans to develop six additional parks. As identified in the previous EIR, the City current maintains a park standard of 6 acres per 1,000 residents. Therefore, impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units, which would be within the Specific Plan's buildout projections, and thus, would not increase demand for park facilities beyond previously anticipated levels. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

e) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not result in a need for new or expanded community facilities because the City currently has two community centers, two aquatic facilities, a senior center, and a neighborhood center. Thus, ample facilities currently exist. Therefore, impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units, which would be within the Specific Plan's buildout projections, and thus, would not increase demand for public facilities such as libraries and community centers beyond previously anticipated levels. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to public services. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XVI. Recreation <i>Would the project:</i>					
a) Would the project 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?	No impact.	No	No	No	None
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	No impact.	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not result in a need for new or expanded recreational facilities because the City currently exceeds its parkland/resident ratio of 3.5 acres/1,000 residents and also has plans to develop six additional parks. As identified in the previous EIR, the City currently maintains a park standard of 6 acres per 1,000 residents. Therefore, impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units, which is within the Specific Plan's buildout projections and, thus, would not increase demand for recreation facilities beyond previously anticipated levels. Furthermore, the proposed project would include approximately 44,370 square feet of open space, approximately 16,340 square feet of which would be private space consisting of patios and decks, and approximately 18,906 square feet of which would be common space, divided into three amenity areas throughout the project site. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not result in a need for new or expanded recreational facilities because the City currently exceeds its parkland to resident ratio of 3.5 acres per 1,000 residents and also has plans to develop six additional parks. Therefore, impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units, which would be within the Specific Plan's buildout projections, and thus, would not increase demand for recreation facilities beyond previously anticipated levels. Furthermore, the proposed project would include approximately 44,370 square feet of open space, approximately 16,340 square feet of which would be private space consisting of patios and decks, and approximately 18,906 square feet of which would be common space, divided into three amenity areas throughout the project site. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to recreation. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XVII. Transportation <i>Would the project:</i>					
a) Conflict with a program plan, ordinance, or policy of the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Significant unavoidable impact.	No	No	No	MM 3.14.9; MM 3.14.12
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	N/A	No	No	No	None
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant impact.	No	No	No	None
d) Result in inadequate emergency access?	Less than significant impact.	No	No	No	None

This section is based on the Preliminary TIS prepared by W-Trans, dated May 27, 2022. The study is provided in Appendix H. The TIS concluded that the proposed project would be expected to generate an average of 590 trips on a daily basis, including 39 during the morning peak-hour and 47 during the evening peak-hour. It also concluded that, during a 5-year period, Sebastopol Road between Fresno Avenue and Lombardi Court has a higher collision rate than the State average for similar facilities. A trend of collisions due to left-turning vehicles at the intersections along the corridor was observed.

The TIS also determined that pedestrian, bicycle, and transit facilities adequately serve the project site based on the existing and planned network of pedestrian, bicycle, and transit facilities within the study area. Additionally, the TIS concluded that the available sight distance from the proposed project driveways along Brittain Lane and Sebastopol Road is adequate. An additional left-turn lane for turns onto the project site from Sebastopol Road was not evaluated as the project driveway is going to be limited to right-turns out only. Further, the TIS found that the project does not cause any queues to exceed the effective storage length at any approach to the intersection of Sebastopol Road/Corporate Center Parkway. The proposed site access and on-site circulation would function

acceptably for emergency response vehicles and given the nominal effect that the project would be expected to have on traffic operation given the limited trip generation. The TIS found that the proposed parking supply of 164 covered spaces and 46 uncovered visitor spaces would satisfy the City's Code requirements for vehicle parking. Private bike storage areas are proposed, satisfying the City's requirements for bike parking. Finally, the TIS concluded project would be expected to have a less than significant transportation impact on VMT.

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not have a significant impact on intersection and local roadway operations but would have a significant impact of freeway mainline and freeway ramp operations. The previous EIR set forth adopted Specific Plan MM 3.14.12, which requires the Dutton Avenue westbound off-ramp to be extended to 550 feet; however, the impact would remain significant and unavoidable. The previous EIR also evaluated construction impacts on roadway operations and set forth adopted Specific Plan MM 3.14.9, which requires a construction traffic control plan to be implemented in conjunction with new development. The previous EIR concluded that impacts associated with buildout were less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

As discussed above, the TIS determined that the proposed project would generate 590 daily trips, 39 AM peak-hour trips, and 47 PM peak-hour trips. Because the proposed project would generate less than 50 peak-hour trips, it would have a *de minimis* impact on traffic operations. W-Trans also evaluated transit, bicycles, and pedestrian modes of transportation and concluded that existing and planned facilities in the project vicinity would adequately serve the proposed project. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR did not evaluate impacts associated with VMT. However, the previous EIR determined that the Specific Plan would promote infill development within an urbanized portion of City served by transit. Furthermore, bicycle and pedestrian facilities (including the Class I Joe Rodota Trail) are within the Specific Plan boundaries. For these reasons, buildout of the Specific Plan would not substantially increase VMT. Therefore, the previous EIR concluded that impacts would be less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

As discussed above, the TIS determined that the baseline unadjusted VMT rate for the project vicinity is 15.02 miles per capita. In order for the project to have a less than significant impact, it must be less than 15 percent below the Sonoma County wide rate of 16.6 miles per capita (i.e., 14.11 miles per capita). Adjusting for the proposed project's density, the proposed project would achieve a VMT rate of 10.9 miles per capita, which would meet the 15 percent

threshold reduction. Thus, the proposed project would have a less than significant transportation impact on VMT. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR.

c) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not create roadway safety hazards because new development would be required to comply with City design standards for streets, access points, and pathways. Therefore, the previous EIR determined that impacts were less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would obtain vehicular access from one point on Sebastopol Road and two points on Brittain Lane. The Sebastopol Road point would be restricted to right-turn only. This restriction would prevent left-turn movements at an unsignalized point on an arterial roadway, which would be beneficial from a roadway safety standpoint. The TIS evaluated the sight distance in either direction at this location and determined that it would be sufficient to allow safe turning movements. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not impair emergency access because new development would be required to adhere to the California Fire Code's emergency access requirements. Therefore, the previous EIR concluded that impacts were less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would obtain vehicular access from one point on Sebastopol Road and two points on Brittain Lane. SFRD Fire Prevention Bureau Standards specify minimum roadway widths of 20 feet and turning radii of 20 feet for the inside turn radius and 40 feet for the outside turn radius. The proposed project design complies with these standards, and thus emergency access and circulation within the project site is considered adequate. Additionally, the proposed project would meet California Fire Code emergency access requirements. Thus, the TIS concluded that the proposed site access and on-site circulation would function acceptably for emergency response vehicles and given the nominal effect that the project would be expected to have on traffic operation given the limited trip generation, the project would be expected to have a less than significant impact on emergency response. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

The following approved mitigation measures are required for all development projects within the Specific Plan planning area, which includes the proposed project. MM 3.14.12 would not be applicable to the proposed project because it is the responsibility of the City.

MM 3.14.9 Prior to construction activities, applicants seeking to construct projects in the project area shall submit a construction traffic control plan to the City of Santa Rosa for review and approval. The plan shall identify the timing and routing of all major construction-related traffic to avoid potential congestion and delays on the local street network. Any temporary road or sidewalk closures shall be identified along with detour plans for rerouting pedestrian and bicycle traffic for rerouting pedestrian and bicycle traffic. The plan shall also identify locations where transit service would be temporarily rerouted or transit stops moved, and these changes must be approved by the Santa Rosa CityBus and Sonoma County Transit before the plan is finalized. If necessary, movement of major construction equipment and materials shall be limited to off-peak hours to avoid conflicts with local traffic circulation.

MM 3.14-12 *Not applicable to the proposed project.*

The City shall widen the Dutton Avenue westbound off-ramp to extend the right turn pocket to a minimum length of 550 feet to alleviate the adverse queueing onto the mainline freeway. The City shall monitor queueing conditions on the ramp through field observations and review of development traffic impact studies and add the widening project to the Capital Improvement Program once it is determined that queues are likely to exceed storage within a five-year time frame. The City shall collaborate with Caltrans in obtaining approvals to complete the widening project.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to transportation. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VIII. Utilities and Service Systems <i>Would the project:</i>					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than significant impact.	No	No	No	None
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less than significant impact.	No	No	No	None
c) 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?	Less than significant impact.	No	No	No	None
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less than significant impact.	No	No	No	None

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	Less than significant impact.	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would not require new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities because the project area is currently served with these utility services and have adequate supplies and capacity. Therefore, impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units on the project site. The proposed project would connect to existing water, sewer, storm drainage and electricity lines located beneath the roadways of Sebastopol Road and Brittain Lane. Thus, new off-site facilities would not be required. Additionally, the proposed project would include solar facilities on-site that would reduce the electricity demand generated by the project. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR determined that the that buildout of the RASRSP would create an annual demand of 1,401 acre-feet per year (AFY). The UWMP projected total demand at 33,518 AFY in 2035. As previously discussed in Section X, Hydrology and Water Quality, Impact X(b), the City anticipates having surplus water supply in year 2035. Given that buildout would reduce water demand compared to that assumed in the City's long-range water planning documents, the previous EIR concluded that there would be adequate supply to meet existing demands and planned future demands, and no new or expanded water entitlements would be required. Therefore, the previous EIR concluded that buildout would not require the City to obtain additional water supplies because the City has a water surplus and the project area's demand is accounted for in the UWMP. Therefore, impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units on the project site. Using the City's UWMP's residential demand rate of 100,000 gallons per year per detached single-family dwelling unit, the proposed project would demand 8.2 million gallons of water annually, which is approximately 25.2 AFY. The previous EIR determined that buildout of the RASRSP would create an annual demand of 1,401 AFY; therefore, the proposed project would account for approximately 1.8 percent of the total demand anticipated in the previous EIR. Thus, the UWMP and RASRSP accounts for the project site's demand in its water demand projections, which also forecast a surplus over the long term. Thus, the proposed project would not require the City to acquire additional water supplies. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

c) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The City of Santa Rosa is responsible for the operation, maintenance, and regulatory compliance of the Laguna Wastewater Treatment Plant (WWTP). The Laguna WWTP has an average daily dry weather flow of 15.5 million gallons per day (mgd) and is permitted for 21.34 mgd average daily dry weather flow. Therefore, the WWTP has excess capacity of approximately 5.84 mgd. The RASRSP buildout is estimated to generate approximately 0.009 mgd, which represents less than 0.1 percent of the excess capacity. Therefore, the previous EIR concluded that buildout would not require the City to add additional wastewater treatment capacity at the Laguna WWTP because there is ample available capacity to serve the project area's effluent generation. Therefore, impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units on the project site. Using the City's persons per household rate of 2.6 per household, the proposed project would generate approximately 214 residents. Using the City's wastewater generation rate of 50 gallons per capita per day, the proposed project would generate 10,700 gallons of wastewater per day. The Laguna WWTP has 5.84 mgd of available treatment capacity. Thus, the proposed project would not require the City to acquire additional treatment capacity. Further, the proposed project's wastewater generation has already been accounted for by the RASRSP. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

Solid waste management in the project area is the responsibility of the City through a franchise agreement with the County, which owns the Central Disposal Facility. The previous EIR concluded that buildout is anticipated to contribute 4.1 pounds of solid waste per capita per day, generating approximately 19.8 tons of solid waste per day or 7,230 tons per year. The Central Disposal Facility has an estimated remaining capacity of 9,470,629 cubic yards and a maximum permitted daily throughput for the solid waste facility of 2,500 tons per day. The

increase in solid waste anticipated to be generated by the Specific Plan represents less than 1 percent of the facility's daily permitted throughput. Therefore, the proposed project would not exceed the landfill's permitted capacity and the buildout of the RASRSP would not require additional landfill capacity because existing landfills (i.e., the Central Disposal Facility) have ample available capacity to serve the project area's solid waste generation. Therefore, impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units on the project site. Using a standard solid waste generation rate of 4.1 pounds of solid waste per person per day, the proposed project would generate 877 pounds (0.44 ton) of solid waste per day or 320,105 pounds (160.6 tons) per year. Therefore, the proposed project's solid waste generation would represent approximately 2.2 percent of the 7,230 tons per year of solid waste generation anticipated by the RASRSP. Further, the Central Disposal Facility has 9.4 million cubic yards of remaining capacity. Thus, the proposed project would not require additional landfill capacity. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

e) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

The previous EIR concluded that buildout would be required to comply with federal, State, and local regulations related to the disposal of solid waste. Future development in the project area would also need to participate in recycling efforts to assist the City in complying with AB 939 diversion rate requirements. Thus, the previous EIR concluded that compliance with these regulations would ensure that impacts are less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project consists of the development of 82 dwelling units on the project site. The proposed project would be served with curbside solid waste, recycling, and green waste collection. Thus, project residents would have the opportunity to divert recyclable materials and green waste from the solid waste stream and would contribute toward meeting State waste diversion targets. Further, the proposed project would comply with federal, State, and local regulations related to the disposal of solid waste, specifically AB 939. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to utilities and service systems. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

Environmental Issue Area	Conclusion in 2016 FEIR	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIX. Wildfire <i>If located in or near State Responsibility Areas or lands classified as very high fire hazard severity zones, would the project:</i>					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	N/A	No	No	No	None
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	N/A	No	No	No	None
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	N/A	No	No	No	None
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	N/A	No	No	No	None

Discussion

a) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

Evaluation of the impacts on adopted emergency response plan and emergency evacuation plan was evaluated within the Traffic and Transportation section of the previous EIR, under Impact 3.14.5 Emergency Access (Standard of Significance 4). The previous EIR concluded that buildout of the RASRSP includes new streets that would improve connectivity within the project area, creating new routes for all users, including emergency responders. Additionally, the previous EIR concluded that buildout would not impair emergency access because new development would be required to adhere to the California Fire Code's emergency access requirements. Moreover, all future development under the RASRSP would be reviewed for compliance with emergency access requirements by public safety officials as part of the City's entitlement process. Therefore, impacts were less than significant.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The proposed project would obtain vehicular access from one point on Sebastopol Road and two points on Brittain Lane. Thus, it would meet California Fire Code emergency access requirements. Further, as part of the entitlements process, the proposed project would be reviewed for compliance with emergency access requirements by public safety officials. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

b) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

Evaluation of the impacts related to wildland fire and fire hazard was generally discussed within the Hazards and Hazardous Materials section of the previous EIR, under the Impacts Not Evaluated in Detail section. The previous EIR concluded that that RASRSP area is generally developed with urban uses and is not adjacent to areas where there is a wildland urban interface fire hazard. Therefore, no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The project site is surrounded on four sides by urban development and infrastructure. Thus, it is not susceptible to wildland fires. Further, according to the California Department of Forestry and Fire Protection (CAL FIRE) Fire Hazard Severity Zone maps, the project site, which is located in a Local Responsibility Area (LRA), is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).³⁷ As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

³⁷ California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Hazard Severity Zone map viewer. Available: <https://egis.fire.ca.gov/FHSZ/>. Accessed June 8, 2022.

c) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

Evaluation of the impacts related to wildland fire and fire hazard was generally discussed within the Hazards and Hazardous Materials section of the previous EIR, under the Impacts Not Evaluated in Detail section. The previous EIR concluded that that RASRSP area is generally developed with urban uses and is not adjacent to areas where there is a wildland urban interface fire hazard. Therefore, the previous EIR concluded that buildout would not increase exposure to wildland fires because the project area is urban in nature, and thus, would not require the installation or maintenance of associated infrastructure (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities). Therefore, no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The project site is surrounded on four sides by urban development and infrastructure. Thus, it would not require the installation of wildfire fighting infrastructure. Further, according to the CAL FIRE Hazard Severity Zone maps, the project site, which is located in an LRA, is not located in a VHFHSZ. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

d) Summary of the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation EIR

Evaluation of the impacts related to wildland fire and fire hazard was generally discussed within the Hazards and Hazardous Materials section of the previous EIR, under the Impacts Not Evaluated in Detail section. The previous EIR concluded that that RASRSP area is generally developed with urban uses and is not adjacent to areas where there is a wildland urban interface fire hazard. Therefore, the previous EIR concluded that buildout would not increase exposure to wildland fires because the project area is urban in nature, and thus, would not be susceptible to post-fire flooding or land sliding. Therefore, no impact would occur.

851 Brittain Lane Subdivision Project Analysis and Conclusions

The project site is surrounded on four sides by urban development and infrastructure. Further, according to the CAL FIRE Hazard Severity Zone maps, the project site, which is located in an LRA, is not located in a VHFHSZ. Thus, it is not susceptible to post-fire hazards such as land sliding or flooding. As such, the proposed project would not introduce new environmental impacts or create more severe environmental impacts than those analyzed in the previous EIR. No additional analysis is required.

Mitigation Measures

None.

Conclusion

There is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to wildfire. The conclusions from the previous EIR remain unchanged when considering the implementation of the proposed project.

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