3575 Mendocino Avenue Project

CEQA Addendum to the 2020 Adopted Sustainable Communities Environmental Assessment

December 2, 2022

Prepared for:

City of Santa Rosa
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Acronyms and Abbreviations

AFY	acre feet per year
APN	assessor's parcel number
Applicant	Quarterra
approved project	3575 Mendocino Avenue Project
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
CAL FIRE	California Department of Forestry and Fire Protection
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of Santa Rosa
CO	carbon monoxide
CRMP	Cultural Resources Monitoring Plan
DPM	diesel particulate matter
du/ac	dwelling units per acre
EIR	Environmental Impact Report
ERPP	Emergency Response and Preparedness Plan
EV	electric vehicle
GHG	greenhouse gas
gpd	gallons per day
gsf	gross square feet
Highway 101	U.S. Highway 101
HRA	Health Risk Assessment
HVAC	heating, ventilation, and air conditioning
MERV	minimum efficiency reporting value

MMRP	Mitigation Monitoring and Reporting Program
MTC/ABAG	Metropolitan Transportation Commission/Association of Bay Area Governments
NOA	naturally occurring asbestos
NPDES	National Pollutant Discharge Elimination System
nsf	net square feet
OPR	California Governor's Office of Planning and Research
PDA	priority development area
Plan Bay Area	Plan Bay Area 2040
$PM_{2.5}$	particulate matter 2.5 microns in diameter or less
PM_{10}	particulate matter 10 microns in diameter or less
PRC	Public Resources Code
-RC	Resilient City combining district
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCEA	Sustainable Communities Environmental Assessment
SCS	Sustainable Communities Strategy
-SH	Senior Housing combining district
SRCSD	Santa Rosa City School District
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminants
Tubbs Wildfire	2017 Central Lake-Napa-Unit Complex Tubbs Wildfire
TV-R	Transit Village Residential zoning district
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
WTP	Wastewater Treatment Plant

1.0 INTRODUCTION

This document is an Addendum to the Sustainable Communities Environmental Assessment (SCEA) prepared for the 3575 Mendocino Avenue Project (approved project) adopted by the City of Santa Rosa (City) on December 8, 2020. The approved project involves redevelopment of an approximately 13.3-acre infill site into a compact, sustainable, transit-oriented, master planned transit village community with up to 532 high-density multi-family housing units consisting of 162 senior affordable units and 370 market rate housing units. The approved project also includes 1-acre of shared open space and the construction of a new public street (0.8 acre), on- and off-site utility infrastructure, parking (including surface, covered, and an aboveground garage), driveways, frontage improvements, landscaping, and a new stormwater outfall into the adjacent, off-site Russell Creek.

The 2020 SCEA concluded that all environmental impacts associated with the approved project would be less than significant, with the implementation of mitigation measures adopted for the following resources: Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Tribal Cultural Resources, and Wildfire.

Since project approval, Quarterra (Applicant) has made modifications to the market rate housing component. The modifications primarily include a reduction of the market rate housing units; the addition of a 5,166 square foot clubhouse; and reconfiguration of the number of buildings, parking, and 1-acre of shared open space (modified project). The modified project does not involve any changes to the senior affordable housing development, on- and offsite utility infrastructure, driveways, frontage improvements, or the stormwater outfall into Russell Creek that were approved under the 2020 SCEA.

In accordance with California Environmental Quality Act (CEQA) Guidelines Sections 15162, 15164, and Public Resources Code (PRC) Section 21166, this Addendum has been prepared to determine whether any new significant environmental impacts that were not previously identified in the adopted 2020 SCEA would result from the modified project, or whether previously identified significant impacts would be substantially more severe as a result of these changes.

1.1 PROJECT LOCATION

The approximately 13.3-acre project site is located at 3575 Mendocino Avenue in the City of Santa Rosa, Sonoma County. The project site consists of a single parcel identified as Assessor's Parcel Number (APN) 173-030-001. The project site is within the Mendocino Avenue/Santa Rosa Avenue Corridor Priority Development Area (PDA) and located approximately 0.2 mile (0.38 mile walking distance) from the Bicentennial Way Transit Facility. The Bicentennial Way Transit Facility is a major transit stop located in front of Kaiser Permanente Santa Rosa Medical Center on Bicentennial Way, a high-quality transit corridor that is served by Santa Rosa CityBus Routes 1 and 10. Route 1 is two-way with no one-way loops and operates every 15 minutes, Monday through Friday. Route 1 connects the project site to the Santa Rosa Junior College, Kaiser Permanente Santa Rosa Medical Center, and Coddingtown Mall Transit Hub, all of which are located within approximately 1 mile of the project site. Route 10 intersects

with Route 1 and runs along the project site's frontage on Mendocino Avenue. There are six bus stops in the vicinity of the project site; one near the project's site entrance on the west side of Mendocino Avenue, one on the east side of Mendocino Avenue near the project site's frontage, one on the west side of Mendocino Avenue in front of Kaiser Permanente Santa Rosa Medical Center, one on the east side of Mendocino Avenue across from Kaiser Permanente Santa Rosa Medical Center, one on the north side of Bicentennial Way in front of Kaiser Permanente Santa Rosa Medical Center (Bicentennial Way Transit Facility), and one on the south side of Bicentennial Way across from Kaiser Permanente Santa Rosa Medical Center.

1.2 SITE HISTORY

Historically, the project site was undeveloped land situated within agricultural land uses outside the City's jurisdiction. In the mid-1950s, the project site was annexed into the City as part of the North Santa Rosa Annexation, and the Journey's End Mobile Home Park was constructed on the project site. The Journey's End Mobile Home Park occupied the project site for more than 50 years and was developed with gravel pads for 161 mobile homes, a clubhouse, pool, game room, laundry room, RV storage, car wash, and dog run. However, in October 2017 most of the mobile home park was destroyed by the 2017 Central Lake-Napa-Unit Complex Tubbs Wildfire (Tubbs Wildfire); only a few mobile homes were left remaining. The Tubbs Wildfire burned 36,807 acres, and destroyed or damaged 5,636 homes.

1.3 EXISTING SETTING AND SURROUNDING LAND USES

The project site was previously developed for mobile home park use and was occupied by the Journey's End Mobile Home Park until it was destroyed in October 2017 by the Tubbs Wildfire. The property primarily extends over generally flat terrain that gently slopes to the southwest. PG&E provides gas and electric utilities to the project site, and sewer service is provided by the City. Water was provided to the mobile home park by two private onsite wells and an above-ground water distribution system; however, the approved project would connect to the City's water system. The project site is surrounded by urban development and is in close proximity to services and major employers, including healthcare and medical services, retail, restaurant, and market/grocery. Land uses surrounding the project site include commercial and office uses to the east, Russell Creek and the Kaiser Permanente Santa Rosa Medical Center to the south, US Highway 101 (Highway 101) and commercial uses to the west, and the Mendocino Avenue/ Highway 101 Overcrossing to the north.

1.4 LAND USE DESIGNATIONS AND ZONING

As part of the approved project, the project site was rezoned to Transit Village Residential (TV-R) with Resilient City (-RC) combining district and approximately 2.5 acres was rezoned to Senior Housing (-SH) combining district to allow the senior affordable housing component. The TV-R zoning district allows multi-family residential use by right. The -RC combining district seeks to facilitate reconstruction and resilience of areas impacted by the Tubbs and Nuns Wildfires in October 2017. Parcels located within fire-affected areas are zoned -RC.

2.0 CEQA AUTHORITY FOR THE ADDENDUM

A SCEA is similar in some respects to a negative declaration, primarily in that the City must find that all significant or potentially significant impacts of a project have been identified and analyzed, and those impacts have been mitigated to a less than significant level. CEQA establishes the type of environmental documentation required when changes to a project occur after lead agency approval, adoption, or certification of the initial environmental document. Specifically, Section 15164(b) of the CEQA Guidelines states that: An Addendum may be prepared if only minor technical changes or additions are required, and none of the conditions identified in CEQA Guidelines Section 15162 are present. The following identifies the standards set forth in Section 15162 as they relate to the project:

1. Substantial changes are proposed in the project which will require major revisions to the previous Environmental Impact Report (EIR) or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

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 negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

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 negative declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR [or negative declaration];

    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 EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The City has determined that the previously approved 2020 SCEA provides informational value relevant to analyzing the environmental impacts of the modified project. In addition to CEQA Guidelines Sections 15162, 15164, and PRC Section 21166, an Addendum is specifically authorized in PRC Section 21159.28(a) for residential streamlining projects such as the modified project. As demonstrated by the analysis in this document, the modified project would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts. Rather, all of the impacts associated with the modified project are within the envelope of impacts addressed in the approved 2020 SCEA and do not constitute a new or substantially increased significant impact. Therefore, there are no changes in the modified project; no changes in the circumstances under which the modified project area being undertaken; and no new information exists to meet the criteria for a Supplemental or Subsequent SCEA pursuant to CEQA Guidelines Section 15162 or PRC Section 21166.

3.0 PROJECT SUMMARY

3.1 OVERVIEW OF THE APPROVED PROJECT

Under the approved 3575 Mendocino Avenue Project, the 13.3-acre infill site would be redeveloped with up to 532 high-density multi-family housing units consisting of 162 units affordable for low and very low senior households and up to 370 market rate housing units. The approved senior affordable housing component would construct three separate four-story buildings totaling 136,185 gross square feet (gsf) on 2.5 acres of the project site. The approved market rate housing component would construct eight separate three- or four-story buildings totaling 510,531 gsf on nine acres of the project site. The approved market rate housing units would consist of 18 studios, 111 one-bedroom units, 185 two-bedroom units, and 56 three-bedroom units. The units would range in size from approximately 500 to 1,300 square feet.

The approved project would include approximately 158,500 sf of parking and a total of 719 vehicle parking spaces. Parking for the approved market rate component would be provided in various parking configurations, including surface, covered, and an aboveground garage. The surface parking would be approximately 34,000 square feet with 205 spaces and the covered parking would be approximately 52,500 square feet with 271 spaces. The proposed aboveground parking garage would be four levels and approximately 72,000 gsf with 243 spaces. The market rate housing component would be wired to accommodate 53 electric vehicle (EV) charging stations as required by the Santa Rosa Municipal Code. The market rate housing component would also provide 100 bicycle parking spaces in secure indoor bicycle rooms located within the buildings and at the building entries, as required by the Santa Rosa Municipal Code.

Additionally, the approved project includes approximately 1-acre of shared open space and the construction of a new public street (0.8-acre), on- and offsite utility infrastructure, driveways, frontage improvements, landscaping, and a new stormwater outfall into the adjacent, offsite Russell Creek. The approved project site plan is shown in Figure 1.

3.2 REQUESTED CHANGES TO THE APPROVED PROJECT

3.2.1 Market Rate Housing Component

The modified project is proposing to reduce the market rate housing component to 260 units, resulting in a total of 422 units with the 162 senior affordable housing units included. The modified market rate housing component would be reconfigured as a garden style apartment complex with 13 separate buildings totaling approximately 298,519 gsf. The modified units would consist of 182 one-bedroom units and 78 two-bedroom units, ranging from approximately 637 to 1,099 net square feet (nsf). The modified market rate housing component is also proposing to construct a 5,166 square foot clubhouse. The clubhouse would include a fitness facility, leasing office, maintenance room, workroom, and outdoor swimming pool.

The modified apartment buildings would be three stories with tuck under parking at the rear. All parking for the market rate housing component would be aboveground and consist of 130 tuck under garage spaces, 130 carport spaces, and 130 surface parking spaces (390 parking spaces total). The modified market rate housing component would not construct the 79,000 square foot aboveground parking garage proposed under the approved project. The market rate housing component would provide 20 EV parking spaces; 10 spaces with EV charging stations and 10 pre-wired spaces as required by the Santa Rosa Municipal Code. The modified market rate housing component would provide 20 bicycle parking spaces consisting of 17 long-term spaces and 3 short-term spaces as required by the Santa Rosa Municipal Code. The modified project would reconfigure the 1-acre shared open space to be located along Mendocino Avenue, between the modified market rate and senior affordable housing components. The shared open space would be redesigned to include a central lawn, green landscaped areas, children's play area, dog run, benches, and shade trees. The modified project would also provide 104 units with a private balcony, which would total approximately 0.21-acre of private open space.

The modified apartment buildings would be three stories with a maximum height of 37 feet. The clubhouse would be one story with a maximum height of 27 feet. The modified buildings would be consistent with the maximum height requirements for the TV-R zoning district (Santa Rosa Municipal Code Section 20-22.050), which allows buildings up to four stories. Each building would be interconnected by courtyards and walkways to access the street frontages and shared open space. The buildings would feature a parapet flat roof, dark windows, and glass railings on the balconies. Building materials would primarily consist of earth toned fiber siding and stucco with accents of board and batten siding. The building exterior materials would be fire resistant and exposed wood would be fire treated. The parapet flat roof would minimize the ability for fire to access the interior of the building. Table 3.2-1 provides a comparison of the market rate housing component under the approved project and the modified project. The modified project site plan is shown in Figure 2.

Table 3.2-1: Approved and Modified Project Comparison

Project Component	Approved Project	Modified Project
Number of Units		
Market Rate Housing Units	370	260
Senior Affordable Housing Units	162	162
Total Units	**532**	**422**
Buildings		
Total structures for market rate housing component	9	14
Aboveground Parking Garage	72,000 gsf	--
Clubhouse	--	5,166 sf
Total NSF	338,025	224,640
Total GSF	**510,531 (with aboveground parking garage)**	**298,519 (aboveground parking garage removed)**
Building Height and Density		

Project Component	Approved Project	Modified Project
Maximum Building Heights / Parapet Height	45' / 50'	32' / 37'
Density for market rate housing component	40.00	28.89
Overall Project Density	40.00	31.73
Open Space		
Shared Open Space	1-acre	1-acre
Private Open Space	0.34-acre	0.21-acre
Parking		
Surface Parking	205	130
Covered Parking	271	260
Aboveground Parking Garage	243	--
Total Parking	**719**	**390**

3.2.2 Utilities

As discussed, there would be no modifications to the on- and offsite utility infrastructure or the stormwater outfall into Russell Creek approved under the 2020 SCEA. The approved project determined the total projected water demand would be approximately 200-acre feet per year (AFY) or approximately 178,400 gallons per day (gpd), and the total wastewater generated would be approximately 172,838 gpd. With the modifications to the market rate housing component, the total projected water demand would be reduced to approximately 77 AFY or 68,742 gpd. The total projected wastewater generation would also be reduced to approximately 65,162 gpd. The modified water and wastewater estimates are within the total projected estimates for the approved project.

Pacific Gas & Electric Company would provide electricity and natural gas services to the market rate housing component. AT&T and Comcast would also provide telephone and cable services. The modified market rate housing component would not include natural gas fireplaces within the apartment buildings, or install the three backup generators as identified under the approved project.

0' 25' 50' 100'

Source: Van Meter Williams Pollack, September 2020

Stantec

Project Location
Santa Rosa, CA

Client/Project
City of Santa Rosa
3575 Mendocino Avenue Project

Figure No.
1

Title
Approved Project Site Plan

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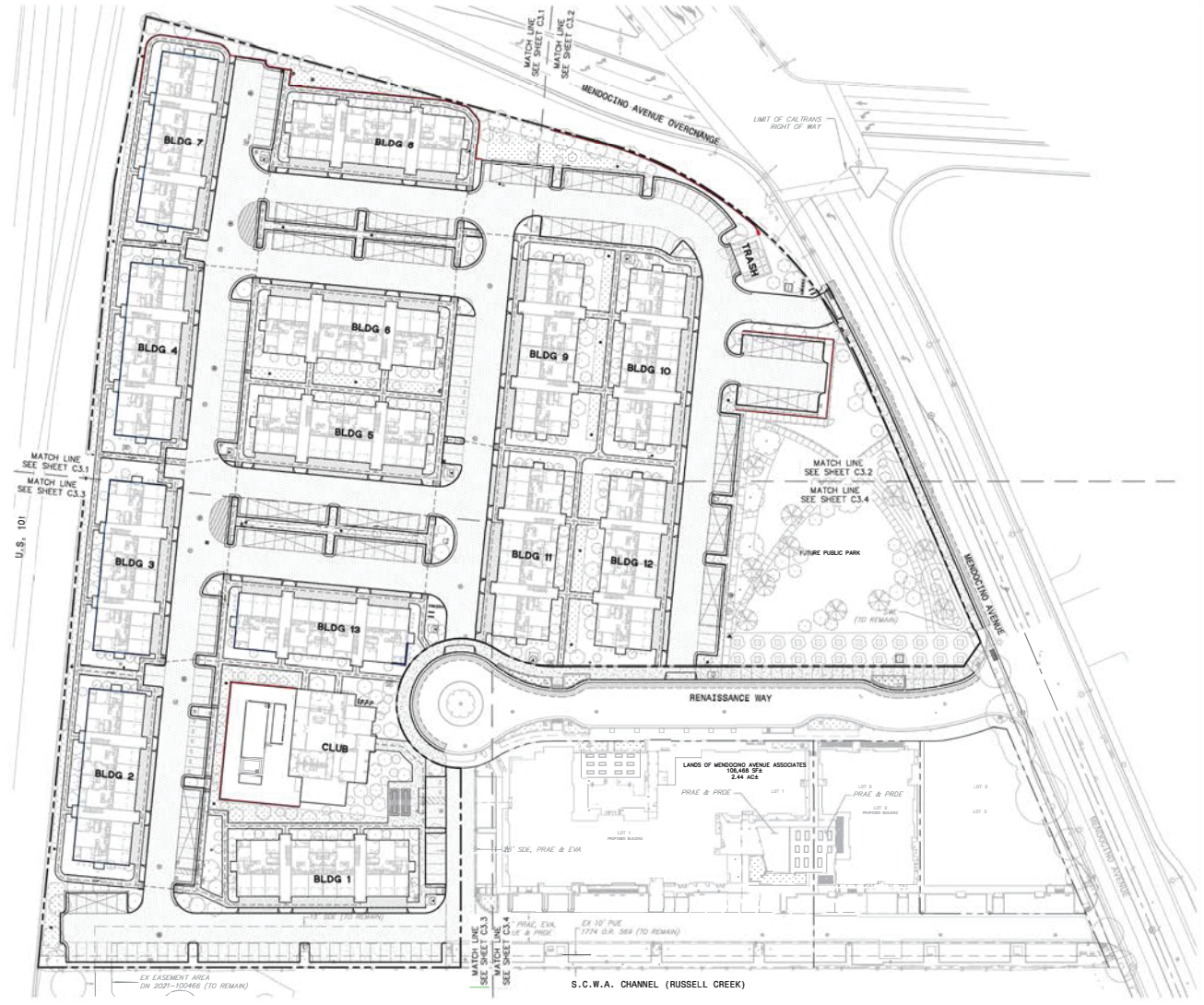

Source: BSB Design, August 2022

Stantec

Project Location
Santa Rosa, CA

Client/Project
City of Santa Rosa
3575 Mendocino Avenue Project

Figure No.
2

Title
Modified Project Site Plan

3.2.3 Construction Activities

Construction of the modified project would take approximately 26 months, starting in May 2023 and ending in August 2025. The modified construction schedule for the market rate housing component is shown below in Table 3.2-2.

Table 3.2-2: Modified Construction Schedule

Task	Start Date	End Date
Demolition and Site Preparation	May 1, 2023	May 31, 2023
Grading	June 1, 2023	August 22, 2023
Building Construction	November 9, 2023	August 14, 2025
Paving	November 3, 2023	November 9, 2023

Construction of the modified project would disturb approximately 10 acres of the project site. As shown in Table 3.2-3, the modified project would result in approximately 303,530 square feet of impervious surface and approximately 128,015 square feet of pervious surface. The increase in impervious surface is due to the addition of apartment buildings and sidewalks. These modifications would be within the original approved project footprint and would not result in the construction of structures outside of the approved project site.

Table 3.2-3: Comparison of Impervious and Pervious Areas

Area	Approved Project	Modified Project
Impervious Surface		
Roads	136,327	134,000
Buildings	101,000	104,800
Sidewalks	44,000	64,730
Total Impervious	**281,327**	**303,530**
Pervious Surface		
Landscaping	150,434	128,015

4.0 SCEA CONSISTENCY AND TRANSIT PRIORITY PROJECT CRITERIA

4.1 SENATE BILL 375

The State of California adopted Senate Bill (SB) 375, also known as the Sustainable Communities and Climate Protection Act of 2008, which outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California's greenhouse gas (GHG) emissions reduction mandates. SB 375 requires the state's 18 metropolitan planning organizations to incorporate a Sustainable Communities Strategy (SCS) into their Regional Transportation Plan (RTP) to achieve their respective region's GHG emission reduction targets set by the California Air Resources Board (CARB). Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria; one such CEQA streamlining tool is the SCEA.

The Metropolitan Transportation Commission/Association of Bay Area Governments (MTC/ABAG) are the joint metropolitan planning organizations for the San Francisco Bay Area region, including Sonoma County. On July 26, 2017, MTC/ABAG jointly adopted its second RTP/SCS known as Plan Bay Area 2040 (Plan Bay Area), which serves as an update to the 2013 Plan Bay Area RTP/SCS.

For the San Francisco Bay Area region, CARB has set GHG emissions reduction targets at a 7 percent reduction in per-capita emissions from cars and light-duty trucks by 2020, and a 15 percent reduction by 2035 relative to 2005 levels. The Plan Bay Area outlines strategies to meet or exceed the targets set by CARB. By Executive Order, approved June 25, 2018, CARB officially determined that the Plan Bay Area would, if implemented, meet CARB's 2020 and 2035 GHG emission reduction targets (CARB 2017a).

Since the preparation of the 2020 SCEA, MTC/ABAG jointly adopted its third RTP/SCS known as Plan Bay Area 2050 on October 21, 2021. Beginning October 1, 2018, for the San Francisco Bay Area Region, CARB set GHG reduction targets at a 10 percent reduction in per-capita emissions from cars and light-duty trucks by 2020, and a 19 percent reduction by 2035 relative to 2005 levels. The updated Plan Bay Area 2050 outlines strategies to meet or exceed these targets.

4.2 TRANSIT PRIORITY PROJECT CRITERIA

PRC Section 21155 sets forth the requirements for a project to qualify as a transit priority project. To qualify, a project must meet the following:

1. Be consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in a SCS (see California PRC Section 21155[a]); and

2. Be a qualified "transit priority project" (as defined in California PRC Section 21155[b]).

The following information demonstrates that the modified project is a qualified transit priority project pursuant to the requirements of PRC Sections 21155(a) and 21155(b), and therefore, is eligible for certain CEQA streamlining benefits by way of preparing a SCEA for purposes of compliance with CEQA.

1. ***The project must be consistent with the general land use designation, density, building intensity, and applicable policies specified for the project area in either a SCS or alternative planning strategy.***

   The project site is within the Mendocino Avenue/Santa Rosa Avenue Corridor PDA in the adopted Plan Bay Area, which is the SCS for the Bay Area as required by SB 375 (MTC/ABAG 2017). PDAs are areas where new development will support the needs of residents and workers in a pedestrian friendly environment served by transit. Local jurisdictions, including the City, define the character of their PDAs according to existing conditions and future expectations as regional centers, mixed-use corridors, city centers, suburban centers, and/or transit town centers. The Mendocino Avenue/Santa Rosa Avenue Corridor PDA is identified as a mixed-use corridor PDA by the Plan Bay Area. The updated Housing Element (adopted in 2015) of the City's General Plan, identifies the Mendocino Avenue/Santa Rosa Avenue PDA as a transportation corridor for new development with increased densities that will support use of bus transit. It is expected that the Mendocino Avenue/Santa Rosa Avenue Corridor PDA would add approximately 2,510 housing units and 6,850 jobs by 2040 (MTC/ABAG 2017).

   The modified project involves the development of a compact, pedestrian friendly, transit-oriented, sustainable, master planned high-density residential transit village community along Mendocino Avenue, and therefore would be consistent with the Mendocino Avenue/Santa Rosa Avenue mixed-use corridor designation under Plan Bay Area. Furthermore, the modified project would be within the growth forecast assumptions for the Mendocino Avenue/Santa Rosa Avenue Corridor PDA as it would provide up to 422 multi-family housing units and 17 new jobs. The policies of the Plan Bay Area RTP/SCS are embedded in the metrics and growth forecast assumptions; therefore, projects consistent with the growth forecast assumptions of the Plan Bay Area are consistent with these policies. As such, the modified project is consistent with the general land use designation, density, building intensity, and policies of the Plan Bay Area.

2. ***The project must contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent non-residential uses, a floor area ratio of not less than 0.75;***

   As with the approved project, the modified project involves the development of a transit village containing 100 percent residential uses. The modified project would reduce the market-rate housing component from 298,519 gsf of market rate housing. The modified project does not include the development of non-residential uses. Therefore, the modified project would be consistent with this criterion.

3. The project must provide a minimum net density of at least 20 units per acre; and

The modified project would result in a net density of 31 dwelling units per acre (du/ac) (422 dwelling units ÷ 13.3 acres). As such, the modified project would be consistent with this criterion.

4. The project must be located within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

PRC Section 21155(b) defines a "high-quality transit corridor" as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

PRC Section 21064.3 defines a "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21155(b) states that a "major transit stop" is defined in PRC Section 21064.3, except that, for purposes of Section 21155(b), it also includes major transit stops that are included in the applicable regional transportation plan. PRC Section 21099 defines a "transit priority area" as an area within 0.5 mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."

As discussed, the project site is located along Mendocino Avenue approximately 0.2 mile (0.38 mile waking distance) from Bicentennial Way and the Bicentennial Way Transit Facility. Bicentennial Way is a high-quality transit corridor that is served by Santa Rosa CityBus Route 1, which arrives every 15 minutes, Monday through Friday. The Bicentennial Way Transit Facility is a major transit stop that is intersected by Santa Rosa CityBus Routes 1 and 10. Route 1 connects the project site to the Santa Rosa Junior College, Kaiser Permanente Santa Rosa Medical Center, and Coddingtown Mall Transit Hub, all of which are located within approximately 1 mile of the project site. Route 10 runs along Mendocino Avenue and Bicentennial Way and connects to Coddingtown Mall Transit Hub and downtown Santa Rosa. This route is part of the Santa Rosa Avenue/Mendocino Avenue/Bicentennial Way/Range Avenue high-frequency transit corridor identified in the Sonoma County Comprehensive Transportation Plan (SCTA 2016). The modified project would occur within the footprint of the approved project, and therefore would be consistent with this criterion.

4.3 PREVIOUS RELEVANT ENVIRONMENTAL ANALYSIS

PRC Sections 21151.2(a) and 21159.28(a) require that a transit priority project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. The 2020 SCEA relied on the mitigation measures from the City of Santa Rosa General Plan EIR and Plan Bay Area EIR and therefore these previous environmental documents would apply to the modified project.

City of Santa Rosa General Plan EIR

In June 2009, the City certified a Program EIR for the Santa Rosa General Plan 2035. The EIR provides a general review of the environmental effects of infill and/or redevelopment of the City based on proposed land use designations in the General Plan. The EIR includes policies and implementation programs from the General Plan that would mitigate potential effects and identifies any additional necessary mitigation measures to minimize significant impacts to the environment. Based on review of the General Plan EIR, none of the additional mitigation measures identified would directly apply to the approved or modified project. However, the approved and modified project would be subject to all relevant policies through the City's development review process. Therefore, General Plan policies applicable to the approved project were incorporated into the respective resource sections in Section 4.0, Environmental Checklist and Environmental Evaluation, of the 2020 SCEA. The General Plan policies applicable to the approved project would continue to be applicable to the modified project.

In 2012, the City prepared a Supplemental Program EIR for the Santa Rosa General Plan Amendment and Climate Action Plan (CAP). The Supplemental Program EIR evaluated potential impacts related to aesthetics, air quality, and GHG and climate change adaptation. The Supplemental Program EIR determined that the General Plan Amendment and CAP did not alter the assumptions regarding the location of development within the City. The Supplemental Program EIR determined that implementation of the CAP would reduce GHG emissions in Santa Rosa by ensuring that new development incorporates specific project features. None of the additional mitigation measures identified by the Supplemental Program EIR directly applied to the approved project. Section 3.7, Greenhouse Gas, of the 2020 SCEA included all policies of the CAP that applied to the approved project. Mitigation measures identified by the Supplemental Program EIR would not directly apply to the modified project and the modified project would continue to implement the applicable policies identified in the 2020 SCEA.

In addition, in 2014, the City prepared an Addendum to the General Plan EIR for the Housing Element Update. The Addendum to the General Plan EIR determined that the proposed Housing Element would not require major revisions to the adopted General Plan or its associated EIR because there are no new significant environmental effects or substantial increases in the severity of significant effects beyond those previously identified as part of the City's environmental review process. No additional mitigation measures or policies were identified.

Plan Bay Area EIR

In July 2017, MTC/ABAG certified a program EIR for the Plan Bay Area. The Plan Bay Area serves as an informational document to inform decision-makers and the public of the potential environmental

consequences of approving the Plan Bay Area. The Plan Bay Area EIR includes mitigation measures designed to help avoid or minimize significant environmental impacts. It is the intent of MTC/ABAG that lead agencies and others use the information contained within the Plan Bay Area EIR to "tier" subsequent environmental documentation of projects in the region.

The Mitigation Monitoring and Reporting Program (MMRP) for the Plan Bay Area EIR does not include project-level mitigation measures that are required to be incorporated into a project. However, the Plan Bay Area EIR MMRP does provide a list of mitigation measures that MTC/ABAG determined a lead agency can and should consider, as applicable and feasible, where the lead agency has concluded that a project has the potential to result in significant effects.

The 2020 SCEA incorporated relevant mitigation measures previously identified by the Plan Bay Area EIR. If incorporation of an applicable Plan Bay Area EIR mitigation measure (PBA EIR MM) was not sufficient to reduce an identified, project-specific impact, then a project-specific mitigation measure was presented in the analysis and would be implemented to ensure less than significant impacts.

Since the preparation of the 2020 SCEA, MTC/ABAG adopted Plan Bay Area 2050 and its associated EIR on October 21, 2021. Plan Bay Area 2050 is the third RTP/SCS jointly adopted by MTC/ABAG and is an update to the Plan Bay Area 2040 while accompanying a new Regional Housing Needs Allocation cycle. Plan Bay Area 2050 expands in scope relative to prior plans by examining the themes of economic development and environmental resilience. The Plan Bay Area 2050 and associated EIR includes strategies to meet or exceed the updated target of 19 percent reduction in GHG emissions from cars and light-duty trucks by 2035 relative to 2005 levels. Plan Bay Area 2050 concluded implementation of the plan would meet the GHG reduction targets. The Plan Bay Area 2050 and associated EIR supersedes the analysis for Plan Bay Area 2040 and includes updated policies and mitigation measures. The 2020 SCEA relies on the Plan Bay Area 2040 and associated EIR as those documents were applicable at the time the 2020 SCEA was adopted on December 8, 2020. The adopted 2020 SCEA serves as the basis for providing this Addendum, and therefore the Plan Bay Area 2040 and associated EIR remain the applicable documents for the modified project.

4.4 SENATE BILL 743

Pursuant to SB 743, effective January 1, 2014, "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects if it meets all of the following three criteria:

- The project is in a transit priority area (an area within one-half mile of a major transit stop);
- The project is on an infill site; and
- The project is residential, mixed-use residential, or an employment center.

Further provisions of SB 743 provide that this legislation "does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other

discretionary powers provided by other laws or policies (PRC Section 21099[d][2][A]), and that aesthetic impacts do not include impacts on historical or cultural resources (Section 21099[d][2][B]).

As discussed in the 2020 SCEA, the approved project meets each of the above three criteria and was not required to consider aesthetic or parking impacts. The modified project would be consistent with the 2020 SCEA finding as the project site is 1) within a PDA and within 0.2 mile (0.38 mile walking distance) of Bicentennial Way Transit Facility, a major transit stop, 2) located on an infill site that was previously developed as a mobile home park, and 3) is a residential project with affordable and market rate housing.

5.0 COMPARATIVE ANALYSIS OF IMPACTS

The modified project proposes minor changes to the approved project within the original approved project footprint and would not result in construction of areas that were not identified in the 2020 SCEA. Modifications to the approved project primarily include a reduction of the market rate housing units; the addition of a 5,166 square foot clubhouse; and reconfiguration of the number of buildings, parking, and 1-acre of shared open space. The modified project does not include any modifications to the senior affordable housing development, on- and offsite utility infrastructure, driveways, frontage improvements, or the stormwater outfall into Russell Creek approved under the 2020 SCEA.

Potential impacts analyzed in the 2020 SCEA related to agricultural and forestry resources, energy, GHG emissions, land use and planning, mineral resources, population and housing, public services, recreation, transportation, and utilities and service systems, were all found to result in no impact or less than significant impact.

Potential impacts analyzed in the 2020 SCEA related to air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, tribal cultural resources, and wildfire, were found to be potentially significant impacts but with implementation of mitigation measures, impacts were reduced to a less than significant level. All impacts identified in the 2020 SCEA were mitigated to a less than significant level.

The following analysis provides a detailed review of each resource category that was analyzed in the 2020 SCEA as compared to any potential impacts from the modified project.

5.1 AGRICULTURAL AND FORESTRY RESOURCES

The 2020 SCEA identified that the project site and adjoining lands are classified as “Urban and Built-up Land” by the Department of Conservation’s Farmland Mapping and Monitoring Program and do not contain agricultural resources. Additionally, the project site is not zoned for agricultural, forestland, or timberland uses or enrolled in a Williamson Act contract. The 2020 SCEA identified that implementation of the project would not result in the conversion of agricultural land to non-agricultural uses or result in the conversion of forestland to non-forest uses. Therefore, the 2020 SCEA concluded that there would be no impact to agricultural and forestry resources.

The modified project would not result in development of lands outside of the originally approved project site footprint and the existing conditions at the project site has not changed since the preparation of the 2020 SCEA. There are no agricultural or forestry resources or uses at the project site and the modified project would not increase impacts related to agricultural and forestry resources. The modified project would continue to have no impact on agricultural and forestry resources as identified in the 2020 SCEA.

5.2 AIR QUALITY

The 2020 SCEA identified that the approved project's construction and operational emissions would be less than the 2017 recommended Bay Area Air Quality Management District (BAAQMD) thresholds and therefore, construction and operation of the approved project would not conflict with or obstruct implementation of an applicable air quality plan or result in cumulatively considerable net increase of any criteria area pollutants. However, the 2020 SCEA determined that construction and operation of the approved project would have potentially significant impacts related to exposure of offsite and onsite sensitive receptors to pollutant concentrations.

The Health Risk Assessment (HRA) prepared for the 2020 SCEA analyzed whether the approved project would expose sensitive receptors to construction-generated fugitive dust (particulate matter 10 microns in diameter or less [PM_{10}]), naturally occurring asbestos (NOA), construction-generated diesel particulate matter (DPM), operational related toxic air contaminants (TACs), or operational carbon monoxide (CO) hotspots. The HRA determined that the approved project would individually expose offsite and onsite sensitive receptors to TACs resulting in an increased cancer risk and would expose onsite sensitive receptors to annual particulate matter 2.5 microns in diameter or less ($PM_{2.5}$) concentrations above the BAAQMD acceptable thresholds. The 2020 SCEA identified Mitigation Measure AIR-1 to reduce impacts to offsite sensitive receptors from DPM emissions generated during construction activities. With implementation of Mitigation Measure AIR-1, impacts to offsite sensitive receptors would not exceed BAAQMD thresholds and impacts to offsite sensitive receptors would be less than significant. The 2020 SCEA identified Mitigation Measure AIR-2 (PBA EIR MM 2.2-5[a]), requiring the approved project to install, operate, and maintain in good working order a central heating, ventilation, and air conditioning (HVAC) system or other air intake system in the building, or in each individual unit that meets or exceeds a minimum efficiency reporting value (MERV) of 13, to reduce onsite sensitive receptor exposure to DPM and $PM_{2.5}$ emissions. Implementation of Mitigation Measure AIR-2 ensured that impacts would not exceed BAAQMD thresholds and impacts to onsite sensitive receptors would be less than significant.

The modified project would reduce the number of market rate units and the overall square footage from 510,531 gsf to 298,519 gsf. Additionally, the modified project would construct 14 structures for the market rate housing component compared to the nine structures for the approved project. Construction of the modified project is estimated to take approximately 26 months. While the modified project would construct five additional structures and extend the construction schedule by five months, construction activities would involve the same intensity of equipment and amount of disturbance (10 acres) as evaluated for the approved project. Therefore, the modified project would not substantially increase construction emissions compared to the approved project which were well below BAAQMD's thresholds. Operation of the modified project would reduce the estimated daily and annual operational air quality emissions by not installing the three backup generators and reducing the number of units. As discussed in Section 5.16, Transportation, the modified project would reduce the daily trip generation, thereby reducing the estimated mobile emissions.

Though the modified project would decrease operational emissions, the construction and operation of the modified project would potentially expose sensitive receptors to pollutant concentrations and require implementation of Mitigation Measures AIR-1 and AIR-2 (PBA EIR MM 2.2-5[a]) as identified in the 2020

SCEA. Mitigation Measure AIR-1 would be implemented to reduce DPM emissions during construction activities by requiring all cranes to meet Tier 4 final emissions standards. Mitigation Measure AIR-2 (PBA EIR MM 2.2-5(a)) would require the modified project to install, operate, and maintain in good working order a HVAC system or other air intake system in the building, or in each individual unit that meets or exceeds a MERV of 13 to reduce onsite receptor exposure to DPM and $PM_{2.5}$. Therefore, the modified project would not increase impacts related to air quality from what was identified in the 2020 SCEA and impacts would remain less than significant with mitigation.

5.2.1 Mitigation Measures

There are no additional mitigation measures required as a result of the modified project. The following mitigation measures identified as part of the approved project would remain applicable to the modified project:

Mitigation Measure AIR-1: Tier 4 Final Engine Requirements. All cranes used during project construction activities shall be required to meet Tier 4 final emissions standards. Prior to the issuance of any demolition, grading, or building permits a note shall be added to the project plans requiring all cranes used for project construction activities to meet Tier 4 final emissions standards. The construction contractor shall maintain records documenting efforts to comply with this requirement and shall submit records of compliance to the City prior to issuance of certificate of occupancy for each building.

Mitigation Measure AIR-2 (PBA EIR MM 2.2-5[a]): Sensitive Receptors Exposure to TACs and $PM_{2.5}$ Concentrations in Transit Priority Areas. The following measures from PBA EIR MM 2.2-5(a): Sensitive Receptors Exposure to TACs and $PM_{2.5}$ Concentrations in Transit Priority Areas are relevant to this proposed project:

When locating sensitive receptors in TAC risk areas, implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations that include, but are not limited to the following:

- Install, operate, and maintain in good working order a HVAC system or other air intake system in the building, or in each individual unit, that meets or exceeds a MERV of 13 or higher. The HVAC system shall include the following features: Installation of a high efficiency filter and/or carbon filter to filter particulates and other chemical matter from entering the building. Either high efficiency particulate air (HEPA) filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) certified 85 percent supply filters shall be used.

- Maintain, repair and/or replace HVAC system on an ongoing and as needed basis or shall prepare an operation and maintenance manual for the HVAC system and the filter. The manual shall include the operating instructions and the maintenance and replacement schedule. This manual shall be included in the Covenants, Conditions and Restrictions (CC&R) for residential projects and/or distributed to the building maintenance staff. In addition, the applicant shall prepare a separate homeowners manual. The manual shall contain the operating instructions and the maintenance and replacement schedule for the HVAC system and the filters.

- Install passive electrostatic filtering systems with low air velocities (i.e., less than 1 mph).
- Individual and common exterior open space and outdoor activity areas proposed as part of individual projects shall be located as far away as possible within the project site boundary, face away from major freeways, and shall be shielded from the source (i.e., the roadway) of air pollution by buildings or otherwise buffered to further reduce air pollution for project occupants.
- Locate air intakes and design windows to reduce PM exposure (e.g., windows nearest to the roadway do not open).
- Sensitive receptors within buildings shall be located in areas upwind of major roadway traffic to reduce exposure to reduce cancer risk levels and exposure to $PM_{2.5}$.
- Planting trees and/or vegetation between sensitive receptors and pollution source. Trees that are best suited to trapping PM shall be planted, including one or more of the following species: Pine (Pinus nigra var. maritima), Cypress (*X Cupressocyparis leylandii*), Hybrid popular (*Populus deltoids X trichocarpa*), California pepper tree (*Schinus molle*) and Redwoods (*Sequoia sempervirens).*
- Idling of heavy-duty diesel trucks at these locations shall be prohibited or limited to no more than 2 minutes.
- Emissions from diesel trucks shall be reduced through establishing truck routes to avoid residential neighborhoods or other land uses serving sensitive populations, such as hospitals, schools, and childcare centers. A truck route program, along with truck calming, parking, and delivery restrictions, shall be implemented to direct traffic activity at non-permitted sources and large construction projects.

5.3 BIOLOGICAL RESOURCES

The 2020 SCEA identified that the project site does not provide suitable habitat for special-status plant or wildlife species. Additionally, the project site does not provide suitable nesting habitat for special-status birds or raptors. However, trees and shrubs within the project area could provide suitable nesting habitat for other migratory birds protected under the Migratory Bird Treaty Act or the California Fish and Game Code. The approved project included the removal of trees from the project site and therefore, construction activities associated with the approved project including tree removal during the typical nesting season could result in a potentially significant impact on nesting migratory birds. The 2020 SCEA identified Mitigation Measure BIO-1, which requires preconstruction nesting bird surveys during the nesting bird season to document all nests on the project site and implement protective buffers around documented nests during construction to minimize disturbance of nesting birds, to reduce impacts to a less than significant level.

The 2020 SCEA identified that the project area does not contain any sensitive natural communities as classified by the California Department of Fish and Wildlife (CDFW) or designated critical habitat by U.S. Fish and Wildlife Service (USFWS). However, the project area does include aquatic habitats subject to

CDFW jurisdiction under Section 1600 of the California Fish and Game Code, including a perennial stream (Russell Creek) located adjacent to the southern boundary of the project site. The 2020 SCEA also identified that a fresh emergent wetland considered to be potential waters of the U.S. and waters of the State, subject to the U.S. Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB) jurisdiction under Sections 404 and 401 of the Clean Water Act, exists within the project area. Construction of the approved project was determined to have temporary impacts on the creek as well as permanent impacts to the creek and wetland. To reduce these potentially significant impacts, the 2020 SCEA identified Mitigation Measures BIO-2 (PBA EIR MM 2.9-2) and BIO-3 to reduce impacts to a less than significant level. Mitigation Measure BIO-2 requires coordination and permit approval from the appropriate resources agencies (CDFW, USACE, RWQCB) and would require mitigation to offset impacts to jurisdictional features. Mitigation Measure BIO-3 would also require restoration of temporarily and permanently impacted areas of Russell Creek to preconstruction conditions following the completion of construction activities and mitigation of wetland features at a 1:1 ratio through the purchase of wetland conservation credits at a local mitigation bank. With implementation of Mitigation Measures BIO-2 and BIO-3, impacts to riparian habitat or other sensitive natural communities and potential waters of the U.S. and waters of the State would be less than significant.

The modified project would not result in construction activities outside of the original approved project footprint and therefore, would not result in requiring additional analysis for biological resources for areas outside of the boundaries analyzed in the 2020 SCEA. The modified project involves changes to the market rate housing component and reconfiguration of the number of buildings, parking, and 1-acre of shared open space. The modified project does not include any changes to the stormwater outfall into Russell Creek that was approved under the 2020 SCEA.

The modified project would continue to implement Mitigation Measure BIO-1, which requires preconstruction nesting bird surveys during the nesting bird season. The modified project would not be subject to Mitigation Measures BIO-2 (PBA EIR MM 2.9.2) or Mitigation Measure BIO-3 as these mitigation measures have been fulfilled with the Section 401 certificate issued by the RWQCB on February 26, 2021 and the Section 404 permit issued by the USACE on July 29, 2021. Therefore, the modified project would not increase impacts related to biological resources from what was identified in the 2020 SCEA and impacts would remain less than significant with mitigation.

5.3.1 Mitigation Measures

There are no additional mitigation measures required as a result of the modified project. The following mitigation measures identified as part of the approved project would remain applicable to the modified project:

Mitigation Measure BIO-1: Avoid Disturbance of Nesting Birds. Vegetation removal and initial ground disturbance activities should be initiated during the non-nesting season for migratory birds from September 1 to January 31. If work cannot be initiated during this period, a nesting bird survey should be performed by a qualified biologist for species protected by the Migratory Bird Treaty Act and California Fish and Game Code within a 250-foot radius of proposed construction activities for passerines, no more than 2 weeks prior to the start of construction activities. If active nests are found, a no-disturbance buffer

should be placed around the nest until young have fledged or the nest is determined to be no longer active by the biologist. The size of the buffer shall be determined by the biologist based on species and proximity to activities and may be reduced at the discretion of the biologist. Active nests shall be monitored periodically to determine time of fledging.

5.4 CULTURAL RESOURCES

The 2020 SCEA identified that there are no known archaeological resources within the project site and due to the project site and surrounding areas being heavily developed, it is unlikely that buried archaeological resources would be present. However, there is a slight potential for archaeological sensitivity in the general area and therefore, the 2020 SCEA identified Mitigation Measures CUL-1 (PBA EIR MM 2.11-2), CUL-2, and CUL-3 to reduce any potentially significant impacts. Mitigation Measures CUL-1 and CUL-2 outlines procedures to follow in the event undiscovered resources are unearthed during construction activities and requires the preparation of a Cultural Resources Monitoring Plan (CRMP) and implementation of archaeological monitoring during construction activities. Mitigation Measure CUL-3 requires the Project applicant and lead agency to engage in consultation and coordination with interested local California Native American tribes in implementing Mitigation Measures CUL-1, CUL-2, and TRIB-1 (see section 5.17). With the implementation of mitigation measures identified in the 2020 SCEA, potentially significant impacts to archaeological resources were mitigated to a less than significant level. The 2020 SCEA did not identify any other potentially significant impacts related to cultural resources.

As previously stated, the modified project would not involve any construction activities taking place outside of the original approved project footprint and therefore, would not result in the need for new cultural analysis. An Extended Phase 1 Testing Plan was prepared for the approved project on February 24, 2021 to determine the presence or absence of archaeological resources within the project site that would be directly disturbed by project construction activities. The results of the Extended Phase I Testing Plan would be included in the CRMP required by Mitigation Measures CUL-2 and CUL-3. The CRMP would be reviewed by the City and Federated Indians of Graton Rancheria prior to any ground disturbing activities for the modified project. As such, the modified project would continue to implement Mitigation Measures CUL-1, CUL-2, and CUL-3 identified in the 2020 SCEA to reduce potential impacts to undiscovered archaeological resources. Implementation of mitigation measures would ensure that impacts remain less than significant as identified in the 2020 SCEA. Therefore, the modified project would not increase impacts related to cultural resources from what was identified in the 2020 SCEA and impacts would remain less than significant with mitigation.

5.4.1 Mitigation Measures

There are no additional mitigation measures required as a result of the modified project. The following mitigation measures identified as part of the approved project would remain applicable to the modified project:

Mitigation Measure CUL-1 (PBA EIR MM 2.11-2): Archaeological Resources. The following measures from PBA EIR MM 2.11-2: Archaeological Resources are relevant to this proposed project:

Implementing agencies and/or project sponsors shall implement the following measures where feasible and necessary based on project- and site-specific considerations that include, but are not limited to:

- In the event that evidence of any prehistoric or historic-era subsurface archaeological features or deposits are discovered during construction-related earth-moving activities (e.g., ceramic shard, trash scatters, lithic scatters), all ground-disturbing activity in the area of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. If the find is a prehistoric archeological site, the appropriate Native American group shall be notified. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan shall be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find Is determined to constitute either an historical resource or a unique archaeological resource), the archaeologist shall work with the project applicant to avoid disturbance to the resources, and if complete avoidance is not feasible in light of project design, economics, logistics, and other factors, follow accepted professional standards in recording any find including submittal of the standard DPR Primary Record forms (Form DPR 523) and location information to the appropriate California Historical Resources Information System office for the project area.

- Project sponsors shall comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect archaeological resources.

Mitigation Measure CUL-2: Cultural Resources Monitoring. Prior to any ground disturbing activities for the proposed project, a qualified archaeologist shall prepare a Cultural Resources Monitoring Plan for review by and in consultation with the affiliated tribe, and approval by the City. The Plan shall identify the type of archaeological material that could potentially be found within the project area and procedures to follow should any material be encountered during ground disturbing activities. The Plan should provide procedures and guidelines for in-field assessment of the significance of any archaeological material identified during monitoring. All ground disturbance taking place during the initial project grubbing and grading phases shall be monitored by an archaeologist and a tribal monitor from the affiliated tribe in order to check for the inadvertent discovery of archaeological materials. The archaeologist must meet the Secretary of Interior's Professional Qualification Standards for archaeology. The archaeologist and tribal monitor shall be empowered to halt construction activities at the location of a discovery to review possible archaeological material and to protect the resource while the materials are being assessed. Monitoring shall continue until, in the archaeologist's judgment, in consultation with the tribal monitor, additional archaeological resources are not likely to be encountered. If no archaeological resources are discovered during construction, the archaeologist shall prepare a report to document negative findings after construction is complete. If an archaeological deposit is encountered during initial project grubbing or grading activities, all work within 60 feet of the discovery shall cease until the archaeologist and tribal monitor can assess the find, consult with agencies, and make recommendations for the treatment of the discovery. Upon completion of the assessment, the archaeologist shall prepare a report to document the methods and results of the assessment. The final report shall be reviewed by and in consultation with the affiliated tribe, and submitted to the project applicant, City, and the Northwest Information Center.

Mitigation Measure CUL-3: Archeological Resources, Cultural Resources Monitoring, and Tribal Cultural Resources. The Project applicant and lead agency shall engage in consultation and coordination with interested local California Native American tribes in implementing Mitigation Measures CUL-1, CUL-2, and TRIB-1.

5.5 ENERGY

The 2020 SCEA identified that the approved project's construction activities would be estimated to consume a fraction of a percent of the available fuel supplies and would not consume a substantial amount of available energy supplies. Additionally, construction of the approved project was identified to comply with the state's anti-idling regulation which would result in a more efficient use of diesel fuel consumption and therefore, construction fuel consumption associated with the approved project was not determined to be any more inefficient, wasteful, or unnecessary than at other construction sites in the region and impacts would be less than significant.

The 2020 SCEA identified that operation of the approved project would consume energy in the form of transportation fuels from mobile trips, natural gas for heating and cooking, electricity, and propane consumption for emergency generators. The 2020 SCEA concluded that as the approved project would be located within an established community and in close proximity to public transit and provide onsite amenities for bicycles and real-time data kiosks for transit schedules, the approved project would encourage the use of alternative modes of transportation and reduce single occupancy vehicle trips and overall project consumption of transportation fuels. Therefore, the approved project was identified to not result in inefficient, wasteful, or unnecessary vehicular fuel consumption.

The approved project's electricity and natural gas consumption was identified to represent a fraction of a percent of available energy supplies and the buildings and infrastructure constructed as part of the approved project would be constructed to be energy efficient and would comply with California Code of Regulations (CCR) Titles 20 and 24, including CALGreen, and be GreenPoint rated. The approved project's emergency generators would consume propane fuel and fuel consumption based on seven generators operating for 100 hours each annually would represent a fraction of a percent of the hydrocarbon gas liquids consumed by California annually. Therefore, operation of the approved project was determined to not result in wasteful, inefficient, or unnecessary consumption of energy sources and impacts were less than significant. Additionally, the approved project was determined to not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and therefore, all energy impacts resulting from the approved project were identified to be less than significant.

The modified project would remain in close proximity to transit and provide onsite amenities for bicycles, thereby encouraging the use of alternative modes of transportation. As the modified project would reduce the number of residential units being proposed, the modified project's operational consumption of energy resources would be less than that of the approved project. In addition, the modified market rate component would not install the three backup generators as identified under the approved project, reducing consumption of propane fuel. The modified project would continue to comply with regulations related to energy efficiency such as CCR Titles 20 and 24, including CalGreen, and would be constructed to be GreenPoint rated. Fuel consumption associated with construction of the modified project would

remain similar to what was identified for the approved project. Construction of the modified project would continue to comply with the state's regulations related to consumption of diesel fuel and other energy resources. Therefore, the modified project would not increase impacts related to energy from what was identified in the 2020 SCEA and impacts would remain less than significant.

5.6 GEOLOGY AND SOILS

The 2020 SCEA identified that as the project site is located in a seismically active region, the approved project would be subject to seismic related impacts during the design life of the approved project and could result in potentially significant impacts. According to the Geotechnical Study Report prepared for the 2020 SCEA, the project site is susceptible to ground failure due to liquefaction or lateral spreading. The 2020 SCEA identified Mitigation Measure GEO-1, which requires conformance with all recommendations included in the Geotechnical Study Report, to reduce impacts. With implementation of Mitigation Measure GEO-1, impacts related to seismic induced ground shaking and ground failure were reduced to a less than significant level.

The 2020 SCEA identified that the approved project would require earth moving activities which could result in substantial soil erosion or loss of topsoil and result in a potentially significant impact. The approved project would comply with existing regulatory requirements, such as the grading erosion control measures identified in the California Building Code (CBC) and the City's Grading and Erosion Control Ordinance to reduce impacts to a less than significant level. In addition to compliance with existing regulatory requirements, the 2020 SCEA identified that the approved project would be required to implement Mitigation Measure HYD-1 to reduce potential erosion impacts. Mitigation Measure HYD-1 requires the project to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) to comply with the National Pollutant Discharge Elimination System (NPDES) permitting program. The SWPPP would include Best Management Practices (BMPs) to control the discharge of sediment and other pollutants during construction. The 2020 SCEA determined that implementation of a SWPPP and associated BMPs as part of Mitigation Measure HYD-1 would reduce potential erosion impacts to a less than significant level.

The 2020 SCEA also identified potentially significant impacts related to the project site being located on unstable and expansive soils. The Geotechnical Study Report prepared for the approved project determined that the project site is underlain by soils that have high plasticity and very high expansion potential. Additionally, the project site is subject to liquefiable soil layers and the shallow depth of groundwater could further add to the potential for structural instability on the project site. The 2020 SCEA identified that implementation of Mitigation Measure GEO-1 would reduce potential impacts related to unstable and expansive soils to a less than significant level by ensuring the stability of foundations, using properly compacted selected fill materials, and reducing the potential for differential settlement and expansive soils. Mitigation Measure GEO-2 was also identified to reduce potential impacts related to shallow groundwater to a less than significant level. If shallow groundwater is encountered during excavation and trenching activities, temporary dewatering would be required. Mitigation Measure GEO-2 would require the project contractor to prepare a dewatering plan outlining the selected temporary dewatering system for the approved project which would be submitted to the City for review and approval.

The project site is located on a previously developed infill site and the City's General Plan and the University of California Museum of Paleontology online database did not identify any known paleontological resources or unique geologic features at the project site. However, since the approved project would require ground disturbing activities during construction, the approved project could encounter previously undiscovered paleontological resources or unique geologic features and result in a potentially significant impact if the previously undiscovered resource is damaged or destroyed. The 2020 SCEA identified Mitigation Measure GEO-3 (PBA EIR MM 2.11-3) to reduce potential impacts to unique paleontological resources or geologic features to a less than significant level. Mitigation Measure GEO-3 would ensure that proper treatment and documentation of all discovered paleontological resources is performed. Implementation of Mitigation Measures GEO-1 through GEO-3 and HYD-1 were determined to reduce all potentially significant impacts related to geology and soils to a less than significant level.

The modified project would result in the same level of impacts related to geology and soils as identified for the approved project in the 2020 SCEA. The modified project would not include development outside of the original approved project footprint and therefore, would be subject to the same seismic and geologic impacts as the approved project. The modified project would continue to implement Mitigation Measures GEO-1 through GEO-3 and HYD-1 as identified in the 2020 SCEA. Therefore, the modified project would not increase impacts related to geology and soils from what was identified in the 2020 SCEA and impacts would remain less than significant with mitigation.

5.6.1 Mitigation Measures

There are no additional mitigation measures required as a result of the modified project. The following mitigation measures identified as part of the approved project would remain applicable to the modified project:

Mitigation Measure GEO-1: Implement Geotechnical Design Recommendations. Prior to issuance of grading permits, all design specifications and recommendations contained within the Geotechnical Study Report dated December 20, 2019 (Updated September 2, 2020) shall be incorporated into relevant project plans and specifications. The project site plans shall be submitted to the City and reviewed as part of the building permit review process.

Mitigation Measure GEO-2: Prepare and Implement Dewatering and Shoring Plans. If excavation to 4.4 feet bgs or deeper is required for the project, a dewatering plan shall be submitted to the City for approval prior to the issuance of a grading permit. At a minimum, the dewatering plan shall detail dewatering methods, location of dewatering activities, equipment, groundwater sampling, disposal, and discharge point in accordance with the requirements of the North Coast RWQCB. In the event shoring methods are implemented for any excavations, shoring plans shall be submitted to the City for approval prior to the issuance of a grading permit. All shoring plans shall be prepared in accordance with the California Division of Occupational Safety and Health regulations and the City of Santa Rosa Public Works Department engineering standards and specifications.

Mitigation Measure GEO-3 (PBA EIR MM 2.11-3): Paleontological Resources. The following measures from PBA EIR MM 2.11.3: Paleontological Resources are relevant to the proposed project:

Implementing agencies and/or project sponsors shall implement measures where feasible and necessary based on project- and site-specific considerations that include, but are not limited to:

- If paleontological resources are discovered during earthmoving activities, the construction crew will be directed to immediately cease work in the vicinity of the find and notify the implementing agencies and/or project sponsors. The project sponsor will retain a qualified paleontologist for identification and salvage of fossils so that construction delays can be minimized. The paleontologist will be responsible for implementing a recovery plan which could include the following:
    - In the event of discovery, salvage of unearthed fossil remains, typically involving simple excavation of the exposed specimen but possibly also plaster-jacketing of large and/or fragile specimens, or more elaborate quarry excavations of richly fossiliferous deposits;
    - Recovery of stratigraphic and geologic data to provide a context for the recovered fossil remains, typically including description of lithologies of fossil-bearing strata, measurement and description of the overall stratigraphic section, and photographic documentation of the geologic setting;
    - Laboratory preparation (cleaning and repair) of collected fossil remains to a point of curation, generally involving removal of enclosing rock material, stabilization of fragile specimens (using glues and other hardeners), and repair of broken specimens;
    - Cataloging and identification of prepared fossil remains, typically involving scientific identification of specimens, inventory of specimens, assignment of catalog numbers, and entry of data into an inventory database;
    - Transferal, for storage, of cataloged fossil remains to an appropriate repository, with consent of property owner;
    - Preparation of a final report summarizing the field and laboratory methods used, the stratigraphic units inspected, the types of fossils recovered, and the significance of the curated collection; and
    - Project sponsors shall comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect paleontological or geologic resources.

Mitigation Measure HYD-1: Prepare and Implement a SWPPP. Coverage shall be obtained for the project under the City of Santa Rosa's Construction General Permit (Order No. 2009-009-DWQ, as amended by 2010-0014-DWQ and 20152-006-DWQ). Per the requirements of the California State Water Resources Control Board, a SWPPP shall be prepared for the project to reduce the potential for water pollution and sedimentation from proposed project activities. The SWPPP shall address site runoff, assuring that project runoff shall not affect or alter the drainage patterns on the project site. The SWPPP

shall comply with the City's Grading and Erosion Control Ordinance, as specified in Chapter 19-64.010 in the City Code, as well as the Waste Discharge Requirements of the North Coast RWQCB Permit.

5.7 GREENHOUSE GASES

The 2020 SCEA identified that the approved project would result in long-term operational GHG emissions from project-generated vehicular traffic, onsite combustion of natural gas, operation of any landscaping equipment, offsite generation of electrical power, the energy required to convey water and wastewater from the project site, the emissions associated with the hauling and disposal of solid waste from the project site, and the operation of emergency generators. The 2020 SCEA determined that the approved project's service population emissions would not exceed the BAAQMD 2023 GHG efficiency metric and threshold; therefore, the approved project would not generate GHG emissions that would have a significant impact on the environment.

The 2020 SCEA identified that the approved project would comply with the Plan Bay Area, the SB 32 Scoping Plan, and the City's CAP which include plans, policies, and regulations that have been adopted for the purposes of reducing GHG emissions. The 2020 SCEA concluded that the approved project would be consistent with all applicable measures listed in the City's CAP Checklist for New Development, the SB 32 Scoping Plan measures, the Plan Bay Area, and the City's CAP. Therefore, the 2020 SCEA concluded that all GHG impacts resulting from the approved project would be less than significant.

The modified project would reduce the number of residential units. It would also not install the three emergency backup generators. Therefore, the modified project would result in a decrease in operational GHG emissions at the site from what was identified for the approved project. As the approved project was identified to not result in GHG emissions that would exceed applicable thresholds and the modified project would reduce emissions, the modified project would not generate GHG emissions that would have a significant impact on the environment. The modified project would continue to comply with applicable plans, policies, and regulations adopted for the purposes of reducing GHG emissions such as Plan Bay Area, the SB 32 Scoping Plan, and the City's CAP. Therefore, the modified project would not increase impacts related to GHG emissions from what was identified in the 2020 SCEA and impacts would remain less than significant.

5.8 HAZARDS AND HAZARDOUS MATERIALS

The 2020 SCEA concluded that all impacts related to hazards and hazardous materials would be less than significant and would not require mitigation with the exception of impacts related to wildfire. Though the project site is not located in an area identified as a Very High Fire Hazard Severity Zone (VHFHSZ) by the California Department of Forestry and Fire Protection (CAL FIRE), the project site was subject to the October 2017 Tubbs Wildfire, which destroyed most of the mobile homes that previously occupied the project site. Therefore, since the area has been previously subject to wildfire, it could be subject to wildfire in the future and the approved project could indirectly expose people or structures to potential wildfire risk. The 2020 SCEA identified Mitigation Measures WF-1 and WF-2 to reduce potentially significant impacts to a less than significant level. Mitigation Measure WF-1 requires the preparation of an Emergency Response and Preparedness Plan (ERPP) to ensure that future residents of the approved

project are informed and prepared to evacuate in the event of a wildfire emergency. The ERPP is required to include detailed guidelines for reasonably foreseeable emergencies and disasters that could occur at the project site. Mitigation Measure WF-2 requires the inclusion of fire-resistant landscaping into the landscape design and landscape plans which would be submitted to the City and reviewed as part of the building permit review process. In addition to the identified mitigation measures, the approved project was required to comply with the California Fire Code and all applicable fire safety standards set forth by the City. The approved project's new construction was identified to be constructed with fire-resistant materials and equipped with standard safety features such as certified alarm systems, fire extinguishers, and fire sprinklers. Therefore, the 2020 SCEA determined that with the implementation of identified mitigation measures and compliance with all fire safety requirements, the approved project would not expose people or structures to risk involving wildland fires and impacts would be less than significant.

The modified project would not increase risks associated with wildfires. The modified project would continue to comply with the applicable building standards and requirements related to fire safety identified in the 2020 SCEA and would construct new fire hydrants throughout the project site. The modified project would implement Mitigation Measures WF-1 and WF-2 to ensure that impacts related to wildfires are less than significant. Therefore, the modified project would not increase impacts related to hazards and hazardous materials from what was identified in the 2020 SCEA and impacts would remain less than significant with mitigation.

5.8.1 Mitigation Measures

There are no additional mitigation measures required as a result of the modified project. The following mitigation measures identified as part of the approved project would remain applicable to the modified project:

Mitigation Measure WF-1: Project Emergency Response and Preparedness Plan. An Emergency Response and Preparedness Plan shall be prepared for the project to ensure that future residents are informed and prepared to evacuate in the event of a wildfire emergency. The Plan shall include detailed guidelines for reasonably foreseeable emergencies and disasters that might occur in the project area, including a potential wildfire. The Plan shall include the following:

1. Emergency contact information for SRFD, SRPD, and property management
2. Responsibility for coordinating response in the event of an emergency
3. Requirements for residents' emergency preparedness
4. Identified evacuation routes for residents
5. Detailed emergency and disaster procedures

The Plan shall focus on actions that can be taken before, during, and after an emergency such that residents may be better prepared at any point during a possible emergency. The Plan shall be provided to

all residents upon move-in and to management staff. The applicant shall provide a copy of the ERPP to the City, including SRFD and SRPD, for informational purposes.

Mitigation Measure WF-2: Fire Resistant Landscaping Plan. The proposed project landscaping plans shall include fire-resistant landscaping (consistent with the 2018 East Bay Municipal Utility District Firescape guidelines) and landscape design. The proposed project plans shall be submitted to the City and reviewed as part of the building permit review process.

5.9 HYDROLOGY AND WATER QUALITY

The 2020 SCEA determined that construction of the approved project has the potential to generate stormwater runoff and to discharge pollutants into Russell Creek and the City's stormwater system which could result in a significant impact. Additionally, the 2020 SCEA identified that project construction activities could result in erosion related impacts and provide substantial sources of polluted runoff, resulting in a potentially significant impact. Mitigation Measure HYD-1, which requires the preparation of a SWPPP and incorporation of BMPs to control sedimentation, erosion, and hazardous materials from contacting stormwater, was identified to reduce water quality impacts to a less than significant level. The 2020 SCEA identified that there would be potentially significant impacts if groundwater is encountered during excavation activities which would require temporary construction dewatering. Discharge of non-stormwater from excavation that contains sediments or other pollutants to sanitary sewer, stormwater systems, creek beds, or receiving waters without treatment is prohibited and therefore, the 2020 SCEA identified Mitigation Measure GEO-2 to reduce impacts to a less than significant level. With implementation of Mitigation Measure GEO-2, the approved project resulted in a less than significant impact to groundwater recharge. The 2020 SCEA also identified that implementation of Mitigation Measures HYD-1 and GEO-2 would ensure that the approved project does not conflict with or obstruct implementation of the Water Quality Control Plan for the RWQCB and result in a potentially significant impact. With the implementation of Mitigation Measure HYD-1 and GEO-2, potentially significant impacts related to hydrology and water quality were mitigated to a less than significant level.

The modified project would increase the total amount of impervious surface at the site from 281,327 square feet for the approved project to 303,530 square feet. The increase in impervious surface is due to the addition of apartment buildings and sidewalks. Though the modified project would increase impervious surfaces at the site, the modified project would not result in changes to the stormwater system or the stormwater outfall into Russell Creek approved under the 2020 SCEA. The increase in impervious surface would not substantially increase any previously identified impacts and would not result in new impacts. The modified project would continue to implement Mitigation Measure HYD-1 and GEO-2 identified in the 2020 SCEA as the modified project would require the same construction activities as the approved project and could result in water quality impacts from construction. The identified mitigation measures would ensure that construction site runoff, which includes polluted runoff, is managed properly and ensure that construction of the modified project would not result in water quality impacts. Therefore, the modified project would not increase impacts related to hydrology and water quality from what was identified in the 2020 SCEA and impacts would remain less than significant with mitigation.

5.9.1 Mitigation Measures

There are no additional mitigation measures required as a result of the modified project. Mitigation Measure HYD-1: Prepare and Implement a SWPPP, and Mitigation Measure GEO-2: Prepare and Implement Dewatering and Shoring Plans are required. The full text of these mitigation measures are provided in Section 5.6.1.

5.10 LAND USE AND PLANNING

The 2020 SCEA analyzed the approved project's potential to physically divide an established community or conflict with any land use plan, policy, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. As the project site is in a fully developed and urbanized area surrounded by existing uses and the project site being previously developed with residential uses, the approved project was determined to not result in physical division of an established community and there was no impact. The 2020 SCEA evaluated the approved project's consistency with applicable goals and policies of the General Plan and requirements of the City's Zoning Ordinance and determined that the approved project would not conflict with any land use plan, policy, or regulation adopted for the purposes of avoiding or mitigation an environmental effect. Therefore, the 2020 SCEA determined that all impacts to land use and planning would be less than significant.

The modified project would not include development outside of the approved project's original project site footprint and would have no effect on an established community. The modified project would continue to comply with the City's General Plan and Zoning Ordinance. The modified project does not include any modifications to the senior affordable housing component of the approved project and would continue to develop 162 dwelling units onsite as affordable to low and very-low income senior households. The modified project would continue to comply with the City's Inclusionary Housing Ordinance by providing onsite senior affordable housing and would exceed the requirements of the ordinance by constructing 38 percent of the total number of new dwelling units as affordable housing. Therefore, the modified project would not increase impacts related to land use and planning from what was identified in the 2020 SCEA and impacts would remain less than significant.

5.11 MINERAL RESOURCES

The 2020 SCEA determined that implementation of the approved project would result in no impacts to mineral resources. The 2020 SCEA identified that there are no known mineral resources within the project site or on land in close proximity, and the project site has not been delineated as a quarry site or been delineated as a locally important mineral recovery site. Therefore, the approved project was determined to not 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 or result in the loss of availability of a locally important mineral resource recovery site.

The modified project would be located within the same project site footprint as the approved project and no changes at the site have occurred since the preparation of the 2020 SCEA that would indicate that there are important mineral resources or a mineral resource recovery site at the project site. Therefore,

the modified project would continue to have no impacts on mineral resources and the modified project would not increase impacts from what was identified in the 2020 SCEA.

5.12 NOISE

The construction and operation of the approved project was determined to both temporarily and permanently increase noise levels in excess of established standards. The 2020 SCEA determined that implementation of the approved project would result in a potentially significant operation impacts related to traffic noise on the interior of the residential units, the generation of noise from new rooftop and exterior mechanical and electrical equipment, and the noise generated from and received by the open space component of the approved project. The 2020 SCEA identified Mitigation Measures NOI-1 and NOI-2 (PBA EIR MM 2.6-2) to ensure interior noise levels inside the residential units and noise generated from open space areas are reduced. Implementation of these mitigation measures would require a qualified acoustical engineer or noise specialist to verify that applicable measures are incorporated into the project design to reduce noise exposure. Mitigation Measure NOI-3 (PBA EIR MM 2.6-5), which requires onsite equipment to be designed to incorporate measures such as enclosures, acoustical louvers, and attenuators, was identified to reduce operational noise levels that may affect nearby properties to a less than significant level.

The 2020 SCEA also identified potentially significant noise impacts resulting from noise generated during construction. Construction activities would result in temporary increases in noise levels and the 2020 SCEA identified Mitigation Measure NOI-4 (PBA EIR MM 2.6-1[a]) and NOI-5 to reduce construction noise impacts by requiring proper equipment use and locating equipment away from sensitive land uses and requiring construction site notice be provided for the public to stay informed of project construction activities. With the implementation of Mitigation Measures NOI-1 through NOI-5, the 2020 SCEA determined that impacts to noise would be less than significant.

The construction and operation of the modified project would be similar to the approved project and the modified project would not include any changes to the approved project that could increase noise related impacts from what was identified in the 2020 SCEA. The modified project would reduce the number of residential units and parking being proposed which would slightly reduce operational noise impacts identified for the approved project. The modified project would continue to implement Mitigation Measures NOI-1 though NOI-5 identified in the 2020 SCEA which would ensure that all operational and construction noise related impacts would be reduced to a less than significant level. Therefore, the modified project would not increase impacts related to noise from what was identified in the 2020 SCEA and impacts would remain less than significant with mitigation.

5.12.1 Mitigation Measures

There are no additional mitigation measures required as a result of the modified project. The following mitigation measures identified as part of the approved project would remain applicable to the modified project:

Mitigation Measure NOI-1: Interior/Exterior Noise Levels. A qualified acoustical engineer or noise specialist shall verify that applicable features are incorporated into the project design to reduce noise exposure, including noise exposure from traffic noise, to levels below 45 dB(A) Ld_n in habitable rooms and 60 dB(A) Ld_n in private and shared recreational facilities as required by Policy NS-B-4 of the General Plan.

Mitigation Measure NOI-2 (PBA EIR MM 2.6-2): Increased Noise from Traffic and Transit. The following measures from PBA EIR MM 2.6-2: Increased Noise from Traffic and Transit are relevant to this proposed project:

To reduce exposure from traffic-noise, lead agencies and/or project sponsors shall consider mitigation measures including, but not limited to those identified below:

- Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is noise compatible with adjacent transportation facilities and land uses.

- Maximize the distance between noise-sensitive land uses and new noise-generating facilities and transportation systems.

Mitigation Measure NOI-3 (PBA EIR MM 2.6-5): Ambient Noise. The following measures from PBA EIR MM 2.6-5: Ambient Noise are relevant to this proposed project:

To reduce exposure to new and existing sensitive receptors from non-transportation noise associated with projected development, implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations that include, but are not limited to:

- Local agencies approving land use projects shall require that external mechanical equipment, including HVAC units, associated with buildings incorporate features designed to reduce noise to below 70 dB(A) CNEL (Ldn) or the local applicable noise standard. These features may include, but are not limited to, locating equipment within equipment rooms or enclosures that incorporate noise reduction features, such as acoustical louvers, and exhaust and intake silencers. Equipment enclosures shall be oriented so that major openings (i.e., intake louvers, exhaust) are directed away from nearby noise-sensitive receptors.

Mitigation Measure NOI-4 (PBA EIR MM 2.6-1[a]): Construction Noise Levels and Groundborne Vibration. The following measures from PBA EIR MM 2.6-1[a]: Construction Noise Levels and Groundborne Vibration are relevant to this proposed project:

To reduce construction noise levels, implementing agencies and/or project sponsors shall:

- Comply with local construction-related noise standards, including restricting construction activities to permitted hours as defined under local jurisdiction regulations);

- Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silencers, wraps);
- Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors; and
- Locate stationary equipment such as generators, compressors, rock crushers, and cement mixers a minimum of 50 feet from sensitive receptors, but further if possible.

Mitigation Measure NOI-5: Construction Activity. A construction site notice shall be posted at the project site that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by Code or any discretionary approval for the project site, and City telephone numbers where violations can be reported. The notice shall be approved by the City, posted and maintained at the project site prior to the start of construction and displayed in a location that is readily visible to the public.

5.13 POPULATION AND HOUSING

The 2020 SCEA identified that the approved project would result in 1,431 residents from the development of 162 senior affordable housing units and 370 market rate housing units based on the City's General Plan estimate of an average of 2.69 persons per household. However, since the senior affordable housing component would include a combination of one- and two-bedroom units and the market rate housing component would include a mix of studio, one-bedroom, two-bedroom, and three-bedroom units, for the purposes of the analysis contained in the 2020 SCEA and to represent a conservative analysis, the estimated number of residents for the approved project was based on the unit mix which would range from 1.9 to 3.25 occupants per unit, resulting in 1,383 residents. The approved project's 1,383 residents were identified to represent approximately 1.5 percent of the City's anticipated growth by 2035 and since the approved project would be consistent with the previous residential use of the project site, the approved project would not result in substantial increase in unplanned population growth. Additionally, as the approved project did not include any commercial space or uses and new jobs needed to support the approved project would reasonably be expected to be filled by the City's existing workforce, the approved project would not indirectly induce substantial population growth. The project site does not contain any existing residential structures or residents onsite as the former Journey's End Mobile Home Park that was previously developed at the site was destroyed in October 2017 by the Tubbs Wildfire. Since then, all remaining buildings after the wildfire were removed to facilitate redevelopment of the site. The 2020 SCEA identified that once the senior affordable housing component is completed, qualifying residents of the former Journey's End Mobile Home Park would be given first priority as tenants and therefore, the approved project would not result in the displacement of existing people or housing, necessitating construction of replacement housing elsewhere. All impacts to population and housing resulting from the approved project were less than significant.

The modified project would not include any changes to the senior affordable housing component of the approved project and the senior affordable housing component would continue to generate 309 residents, as identified in the 2020 SCEA. The modified project would reduce the number of market rate units from

the approved 370 units to 260 units. Based on the person per household factors identified in the 2020 SCEA, the modified market rate component would reduce the number of residents from 1,074 residents to 664 residents. As such, the modified project would decrease the overall number of residents anticipated at the project site from 1,400 to 973, and would be within the population projections contemplated in the 2020 SCEA. The modified project would not develop new commercial uses at the site or result in an increase in the number of employees at the site and therefore, the modified project would not directly or indirectly induce substantial population growth. Additionally, there continues to be no existing residential structures or residents at the project site that would be displaced or require construction of replacement housing. The modified project would continue to have less than significant impacts on population and housing and the modified project would not increase impacts from what was identified in the 2020 SCEA.

5.14 PUBLIC SERVICES

The 2020 SCEA identified that implementation of the approved project would result in a less than significant impact to fire and police protection, schools, parks, and other public facilities. The approved project would increase demand for public services; however, the approved project would be required to pay all required fees, including but not limited to school impact fees, park impact fees, traffic signal participation fees, public facilities improvement fees, special district fees, and street light fees adopted by the City Council and required by the City's Standard Condition of Approval. Revenues and taxes generated from the approved project would contribute to funding for facilities and services that would be affected by the increased demand caused by the approved project and ensure that impacts are less than significant.

The approved project was identified to incrementally increase demand for fire protection services; however, the 2020 SCEA identified that the approved project is not anticipated to result in the construction of a new fire station or the alteration of an existing fire station. The approved project would comply with the California Fire Code and all applicable fire safety standards set forth by the City. The approved project was proposed to be equipped with standard safety features such as certified alarm systems, fire extinguishers, and fire sprinklers, would utilize fire resistant landscaping, and all roads and access points constructed or improved for the approved project would be designed and constructed in accordance with City requirements to ensure adequate emergency vehicle access is provided to the site. These features were determined to reduce fire risk and the demand for fire protection services resulting for operation of the approved project. The 2020 SCEA identified that increased demand for police protection services at the site is not anticipated to require construction of new or physically altered police protection facilities and the increased demand for fire and police protection services would be mitigated with the payment of required fees under the City's Standard Condition of Approval. The modified project would not result in any changes to the fire safety features provided by the new development and would continue to construct and design roadways in accordance with City requirements for fire apparatus access. The modified project would continue to comply with the California Fire Code and all applicable fire safety standards, and would pay all required fees to mitigate impacts to fire and police protection services.

The 2020 SCEA identified that the approved project would generate approximately 408 kindergarten through 12th grade students, increasing the student population at Santa Rosa City School District (SRCSD) by 2.5 percent. The 2020 SCEA identified that impacts to schools would be mitigated with the payment of school impact fees as required under SB 50 and by the City's Standard Condition of Approval. The modified project would decrease the overall number of residents anticipated at the project site from 1,400 to 973 residents. Based on the student generation factor for SRCSD identified in the 2020 SCEA, the modified project would reduce the estimated student population from 408 to 287 students. As such, the modified project would be within the student population projections contemplated in the 2020 SCEA. The modified project would continue to pay all required school impact fees to ensure impacts are less than significant.

The 2020 SCEA identified that the City's existing parkland would accommodate the increase in residents from the approved project and the City would continue to exceed its standard for required parkland per resident. Therefore, as the modified project would result in a lower resident population than the approved project, the City's existing parkland would continue to be able to accommodate the increase in residents from the modified project. The modified project would continue to develop the 1-acre of shared open space that was included in the approved project and would provide passive and active recreational opportunities onsite. Additionally, the modified project includes development of private open spaces as well as a 5,166 square foot clubhouse that would provide amenities such as a fitness facility and outdoor swimming pool. The modified project would continue to pay all required park impact fees as required by the City's Standard Condition of Approval and Section 19.70.090 of the City's Municipal Code. As identified for the approved project, the modified project would pay all fees required by the City's Standard Condition of Approval to offset impacts to any other public facilities, including impacts on library facilities.

Therefore, with the payment of all fees required by the City's Standard Condition of Approval, the modified project would not require the construction of new or physically altered public facilities. The modified project would not result in new or increased impacts to public facilities from what was identified in the 2020 SCEA and impacts would remain less than significant.

5.15 RECREATION

The 2020 SCEA identified that the City currently has an existing 700 acres of operational parkland and has a current population of 176,753 residents resulting in 3.96 acres of parkland per 1,000 residents, meeting and exceeding the City's standard of 3.5 acres of parkland per 1,000 residents. The 2020 SCEA determined the approved project would result in 3.93 acres of parkland per 1,000 residents, meeting and exceeding the City's parkland standard. The approved project would provide 1-acre of shared open space for its residents which would include both active and passive recreational activities. In addition to the shared open space, the senior affordable housing component includes 0.46-acre of private open space and the market rate housing component would include 0.34-acre of private open space, per City requirements. The inclusion of shared and private open space onsite would reduce the demand that the approved project would place on existing recreational facilities. Additionally, the 2020 SCEA identified that the approved project would be required to comply with Section 19.70.090 of the City's Municipal Code which requires developers to pay park impact fees to contribute to funding of park acquisition and development of recreational facilities. Therefore, the 2020 SCEA determined that since the approved

project would be consistent with the City's parkland standards provide onsite open space, and pay all required fees impacts on recreational facilities would be less than significant.

The modified project would reduce the number of market rate housing units, reducing the anticipated residential population to 973 residents. The addition of 973 residents to the identified City population of 176,753 residents would result in 177,726 total residents. With the existing 700 acres of operational parkland in the City, implementation of the modified project would result in 3.94 acres of parkland per 1,000 residents, exceeding the City standard of 3.5 acres per 1,000 residents. Additionally, the modified project would continue to provide the 1-acre of shared open space and 0.34-acre of private open space for the senior affordable housing component identified for the approved project. The private open space for the modified project's market rate housing component would be reduced to 0.21-acre; however, the modified project would include the development of a 5,166 square foot clubhouse which would include a fitness facility and outdoor swimming pool. The modified project would pay the required park impact fees required by City Municipal Code Section 19.70.090 and the City's Standard Condition of Approval. Therefore, the modified project would not result in new or increased impacts to recreation facilities from what was identified in the 2020 SCEA and impacts would remain less than significant.

5.16 TRANSPORTATION

The 2020 SCEA did not identify any significant impacts to transportation from implementation of the approved project. The approved project was consistent with the roadway facilities identified in the City's General Plan and therefore, impacts to roadway facilities were less than significant. The 2020 SCEA identified that the existing sidewalks on Mendocino Avenue effectively connect the project site to the surrounding pedestrian network and the pedestrian facilities serving the project site would be adequate to serve the approved project. Additionally, the existing bicycle lanes on Mendocino Avenue along with the planned future bicycle facilities in the project vicinity would provide adequate access for bicyclists. The 160 bicycle parking spaces proposed onsite as part of the approved project was determined to exceed the City's requirements for bicycle parking under Chapter 20.36.040 of the Santa Rosa Municipal Code. Therefore, existing bicycle facilities and the proposed bicycle parking facilities were determined to be adequate to serve the approved project. The existing transit routes were also determined to be adequate to accommodate project-generated transit trips and transit facilities serving the project site. Therefore, the 2020 SCEA determined that the approved project would not conflict with any applicable plan, ordinance, or policy addressing the circulation system and impacts would be less than significant.

The 2020 SCEA identified that the California Governor's Office of Planning and Research (OPR) *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory*, as well as CEQA Guidelines Section 15064.3(b)(1) indicates that "generally, projects within one-half mile of either a major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact." Additionally, guidance provided in the OPR Advisory with respect to assessing vehicle miles traveled (VMT) for residential projects is that a project generating vehicle travel that is 15 or more percent below the existing citywide residential VMT per capita may indicate a less than significant transportation impact. The 2020 SCEA identified that at the time of preparation of the 2020 SCEA, the City had not yet adopted a standard of significance for evaluating VMT; however, the City had prepared draft guidelines for VMT analysis in their June 2020 document *VMT Guidelines* which contains

much of the same guidance as in the OPR Advisory, including the less than significant presumption for projects near high-quality transit corridors and/or in areas with VMT 15 or more percent below the regional average. The approved project site is located approximately 0.2 miles (0.38 miles walking distance) from the CityBus Route 1 stop on Bicentennial Way near Ventura Avenue with services every 15 minutes on weekdays and would be accessible by both walking and biking and therefore, the approved project fulfilled the screening criterion of being within one-half mile from a high quality transit corridor. Additionally, the 2020 SCEA identified that the model VMT for the traffic analysis zone which includes the project site is 8.63 VMT per capita, which is more than 15 percent less than the Sonoma County Average of 15.56 VMT per capita. The approved project also designated approximately 30 percent of total units to senior affordable housing which would likely further reduce VMT of the approved project as designating a portion of the proposed housing as affordable is listed as a VMT reduction strategy in the City's *VMT Guidelines*. Therefore, the approved project was determined to have a less than significant impact on VMT.

The approved project proposed three access points for the project site along Mendocino Avenue with the northern driveway having limited right turns in and out and the southern driveway being limited to right turns only. The center (main) entrance was proposed to be a public street that would provide full access. The 2020 SCEA identified that the proposed driveways would meet the recommended minimum sight distance along Mendocino Avenue and project egress would be adequate. Additionally, the two driveways and the new public street would be constructed to City standards and provide adequate emergency access. The 2020 SCEA determined that operation of the approved project would not substantially increase hazards due to a design feature or result in inadequate emergency access, and impacts would be less than significant.

W-Trans prepared an Addendum to the 2020 Traffic Impact Analysis (Traffic Addendum) on April 26, 2022 (Appendix A) to reflect the modified project. The Traffic Addendum includes the updated trip generation for the modified project, discussion of pedestrian and bicycle access, and updated VMT analysis.

As discussed in the Traffic Addendum, a new version of the Trip Generation Manual was published in 2021, and rates from this 11th Edition were applied to the modified project. Based on application of these rates, the modified project is expected to generate an average of 1,705 trips per day, including 128 a.m. peak hour trips and 142 trips during the p.m. peak hour. Compared to the approved project and updated trip generation rates, the modified project would result in 907 fewer trips on a daily basis, with reductions of 37 and 63 trips during the morning and evening peak hours, respectively. The Traffic Addendum determined the modified project would result in fewer trips regardless of the trip generation rates applied since there would be 110 fewer units, or a reduction of about 30 percent from what was previously approved. Because the modified project would result in less trips being added to the street network and no significant impacts were identified for the approved project, the Traffic Addendum determined no update to the operational analysis is warranted.

Based on person-trip information available in the 10th Edition of the Trip Generation Manual it was estimated that the market rate housing component would generate 133 person trips during the a.m. peak hour and 192 during the p.m. peak hour. However, based on information available in the 11th Edition, the

project would be expected to result in 13 pedestrian/bicycle/transit trips during the morning peak hour and 18 during the evening peak hour. These values are substantially lower than previously projected, and, given the site's proximity to the Kaiser hospital on the same side of Mendocino Avenue as well as the location of the bus stop on Bicentennial Way that serves several routes in the area, only a portion of these pedestrian trips would be expected to include a crossing of Mendocino Avenue. The Traffic Addendum considered the potential need for warning devices at a designated location where pedestrians could cross Mendocino Avenue to reach the bus stop on the east side of the street. Such devices are typically not recommended where the pedestrian volume is less than 20 per hour. Given that the modified project would generate fewer pedestrian trips (13 pedestrian/bicycle/transit trips during the morning peak hour and 18 during the evening peak hour), the Traffic Addendum determined installation of a traffic signal or other devices such as rectangular rapid-flashing beacons would not be warranted for the modified project.

The modified project would not increase VMT impacts from what was for the approved project. The project site is 0.2 miles (0.38 miles walking distance) from the CityBus Route 1 stop on Bicentennial Way near Ventura Avenue with services every 15 minutes on weekdays and would be accessible by both walking and biking. Therefore, the modified project would meet the screening criterion of being within one-half mile from a high quality transit corridor and result in a less than significant impact. The modified project would not result in new or increased impacts to transportation from what was identified in the 2020 SCEA and impacts would remain less than significant.

5.17 TRIBAL CULTURAL RESOURCES

A field survey of the project site was conducted for the 2020 SCEA and no known archaeological or tribal cultural resources were identified at the site. The survey also noted that the project site has been disturbed by grading, construction, and debris removal from the former mobile home park that was previously located at the project site. Though no tribal cultural resources were identified at the project site, one Tribe stated that the area is sensitive for tribal cultural resources and therefore, subsurface construction activities could potentially damage or destroy previously undiscovered tribal cultural resources and could result in a potentially significant impact. The Tribe requested monitoring of ground disturbing activities during construction of the approved project. The 2020 SCEA identified Mitigation Measures CUL-1, CUL-2, CUL-3, and TRIB-1 to reduce potential impacts to a less than significant level. Mitigation Measure CUL-1 (PBA MM 2.11-2) outlines procedures to follow in the event undiscovered resources are unearthed during construction activities; Mitigation Measure CUL-2 establishes a CRMP and implementation of monitoring during construction; Mitigation Measure CUL-3 requires the Project applicant and lead agency to engage in consultation and coordination with interested local California Native American tribes in implementing Mitigation Measures CUL-1, CUL-2, and TRIB-1; and Mitigation Measure TRIB-1 (PBA EIR MM 2.11-5) requires that public agencies consult with Tribes and when feasible, avoid damaging effects to any tribal cultural resources. The 2020 SCEA determined that with implementation of the identified mitigation measures, all impacts to tribal cultural resources would be less than significant

The modified project would be located within the same project site as the approved project and would not result in ground disturbing activities outside of the original approved project footprint analyzed in the 2020

SCEA. Implementation of the modified project would not increase the impacts to tribal cultural resources identified in the 2020 SCEA. The modified project would continue to implement Mitigation Measures CUL-1, CUL-2, CUL-3, and TRIB-1 identified in the 2020 SCEA to ensure impacts resulting from implementation of the modified project remain reduced to a less than significant level. Therefore, the modified project would not increase impacts to tribal cultural resources from what was identified in the 2020 SCEA and impacts would remain less than significant with mitigation.

5.17.1 Mitigation Measures

There are no additional mitigation measures required as a result of the modified project. The following mitigation measures identified as part of the approved project would remain applicable to the modified project:

Mitigation Measure TRIB-1 (PBA EIR MM 2.11-5): Tribal Cultural Resources. The following measures from PBA EIR MM 2.11-5: Tribal Cultural Resources are relevant to this proposed project:

If the implementing agency determines that a project may cause a substantial adverse change to a TCR, and measures are not otherwise identified in the consultation process required under PRC Section 21080.3.2, implementing agencies and/or project sponsors shall implement the following measures where feasible and necessary to address site-specific impacts to avoid or minimize the significant adverse impacts:

- Public agencies shall, when feasible, avoid damaging effects to any TCR (PRC Section 21084.3 (a)). If the lead agency determines that a project may cause a substantial adverse change to a TCR, and measures are not otherwise identified in the consultation process, new provisions in the PRC describe mitigation measures that, if determined by the lead agency to be feasible, may avoid or minimize the significant adverse impacts (PRC Section 21084.3 (b)). Examples include:

  (1) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

  (2) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

  (A) Protecting the cultural character and integrity of the resource

  (B) Protecting the traditional use of the resource

  (C) Protecting the confidentiality of the resource.

  (3) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

(4) Protecting the resource.

Additionally, Mitigation Measure CUL-1 (PBA EIR MM 2.11-2): Archaeological Resources, Mitigation Measure CUL-2: Cultural Resources Monitoring, and Mitigation Measure CUL-3: Archeological Resources, Cultural Resources Monitoring, and Tribal Cultural Resources would be required. The complete text of these mitigation measures is provided in Section 5.4.1.

5.18 UTILITIES AND SERVICE SYSTEMS

The 2020 SCEA concluded that impacts to utilities and service systems resulting from the approved project would be less than significant. The approved project proposed to construct a looped public water main to connect to the City's existing water main in Mendocino Avenue and was estimated to result in a total water demand of approximately 200 AFY or 178,400 gpd. Additionally, the approved project proposed to construct 11 new fire hydrants throughout the project site and fire mains within the private driveways to serve the individual building. The approved project also proposed to implement water conservation measures by providing water efficient landscaping as required by Title 24 and the City's Water Efficient Landscape Ordinance. All water distribution improvements for the approved project were to be designed and constructed within City right of way or private driveways in accordance with the City's Water Construction Standards and Specifications, and Water Design Standards. The 2020 SCEA determined that the City's existing water system would sufficiently supply water for the approved project and would not result in the relocation or construction of new or expanded water facilities. Additionally, the approved project's anticipated demand was identified to represent a less than one percent increase in the total water supply available to the City from 2020 to 2040 which is estimated to be 31,540 AFY or 28,157,092 mgd. The Santa Rosa Water Department determined in a letter dated June 4, 2020 that the approved project would not substantially increase water demand or affect the City's ability to provide sufficient water supplies to the approved project. Therefore, the 2020 SCEA determined that there would be sufficient water supplies available to serve the approved project and reasonably foreseeable future development during normal, dry, and multiple dry years, and impacts would be less than significant.

The approved project would construct a public sanitary sewer line to connect to the existing sewer main line located along the southern boundary of the project site, which eventually leads to the Laguna Wastewater Treatment Plant (WTP). All sewer distribution improvements were to be designed and constructed within City right of way or private driveway in accordance with the City's Sewer Construction Standards and Specifications, and Sewer Design Standards. The 2020 SCEA identified that the Laguna WTP has a total permitted capacity of 21.34 mgd and average daily dry weather flow of 17.5 mgd. The approved project was estimated to generate 172,838 gpd of wastewater, which represented a less than one percent increase in the 17.5 mgd average dry weather flow at the Laguna WTP. Therefore, wastewater generated by the approved project was determined to be adequately accommodated by the existing capacity of the Laguna WTP. Additionally, the SCEA identified that actual generation rates would likely be lower due to implementation of water conservation measures required by Title 24. The approved project would also provide water-efficient landscaping and may provide a greywater laundry wastewater re-use system. Therefore, the approved project was determined to not result in the relocation or construction of new or expanded wastewater facilities and the wastewater treatment provider would have

sufficient capacity to serve the approved project's wastewater demand and existing commitments. All impacts related to wastewater would be less than significant.

The approved project included the construction of private stormwater lines to serve individual buildings and a new public stormwater line that would be located at the southwest corner of the project site and constructed with an outfall into the adjacent Russell Creek. As required by the City's Standard Urban Stormwater Mitigation Plan, the approved project identified that it would implement post-construction BMPs and low-impact development measures consisting of vegetated swales, bioretention areas, and permeable pavement which would provide 158,000 square feet of pervious surface on the project site. The new outfall and stormwater facilities would be designed in accordance with the requirements of the Sonoma Water's Flood Management Design Manual and the City's Public Strom Drain Standards to ensure sufficient stormwater capacity is provided for the approved project. Therefore, impacts associated with construction of stormwater facilities would be less than significant.

The 2020 SCEA identified that the approved project would connect to the existing electric and natural gas lines on the project site and/or in Mendocino Avenue and would include energy conservation features with a goal to exceed the State's current Title 24 requirements. Additionally, the approved project proposed to install seven backup generators to provide electricity and cooling for residents during an emergency. The electric and natural gas improvements were identified to occur on the project site and/or along Mendocino Avenue and in accordance with PG&E standards and as such, impacts related to construction of electric and natural gas facilities would be less than significant. The approved project would connect to existing telecommunication facilities located on the project site and/or along Mendocino Avenue and would not require expanded capacity; therefore, impacts would be less than significant.

The 2020 SCEA identified that using the waste generation factor for residential use of 5.2 pounds per residents per day and 11.9 pound per employee per day identified for the City by the California Department of Resources Recycling and Recovery, the approved project would generate a total of 3.7 tons per day of solid waste or 1,351 tons per year. Solid waste from the project site would be transferred to one of three landfills that the City utilizes which has a total combined permitted intake capacity of 10,130 tons of waste per day. The approved project's generated waste would represent less than one percent of the daily capacity. The approved project also included recycling and green waste services as required by State and local objectives to reduce solid waste and would comply with all State and local waste diversion requirements, including Chapter 9.12 of the City's Municipal Code regarding waste collection. Therefore, the approved project was determined to not generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure and would comply with federal, state, and local statues and regulations related to solid waste resulting in less than significant impacts.

The modified project would not result in changes to the on- and offsite utility infrastructure or the stormwater outfall into Russell Creek approved under the 2020 SCEA. The modified project would reduce the market rate component to 260 units, thereby reducing the estimated water demand and wastewater generation. The total projected water demand for the modified market rate component would be approximately 77 AFY or 68,742 gpd, resulting in a decrease of 109,658 gpd. The total projected wastewater generation would be approximately 65,162 gpd, resulting in a decrease of 107,676 gpd. The modified project would include a 5,166 square foot clubhouse, which would incrementally contribute to the

water demand and wastewater generation. The modified project would also include a swimming pool; however, this would be a one-time use and estimated to require 30,000 gallons of water. As the modified project would reduce the number of market rate units and substantially reduce the estimated water demand and wastewater generation, the addition of the clubhouse and swimming pool would be accommodated and within the projected estimates for the approved project.

The modified water and wastewater estimates are within the total projected estimates for the approved project. As discussed in the 2020 SCEA, the City determined the City's public water system would be able to support the approved project's water demand and wastewater generation. Therefore, there would be sufficient water supply and wastewater capacity for the modified project. The modified project would continue to design and construct the water, wastewater, and stormwater systems in accordance with City standards and requirements and implement water conservation measures. Additionally, the modified market rate housing component would not install the three backup generators as identified under the approved project. The modified project would reduce the anticipated solid waste generation to 2.6 tons per day or 949 tons per year. Overall, the modified project would reduce impacts associated with utilities and service systems. Therefore, the modified project would not result in new or increased impacts to utilities and service systems from what was identified in the 2020 SCEA and impacts would remain less than significant.

5.19 WILDFIRE

The 2020 SCEA determined that the approved project would not result in significant wildfire impacts due to slope, prevailing winds, and other factors, exacerbating wildfire risk. As describedin Section 5.8 of this Addendum, the project site is not located in an area identified as a VHFHSZ by CAL FIRE. However, the site is in an area that could experience wildfire, as experienced in the 2017 Tubbs Wildfire. Therefore, the 2020 SCEA determined that this was a potentially significant impact and identified appropriate mitigation measures to mitigate impacts to a less than significant level. The 2020 SCEA identified Mitigation Measure WF-1 which requires the preparation of a ERPP to ensure that future residents of the approved project are informed and prepared to evacuate in the event of a wildfire emergency. The 2020 SCEA determined that with implementation of Mitigation Measure WF-1, the overall risk related to uncontrolled spread of wildfires would be less than significant. The 2020 SCEA identified additional potentially significant impacts due to the approved project requiring the installation of associated infrastructure that could exacerbate fire risk or result in temporary or ongoing impacts to the environment. The 2020 SCEA identified Mitigation Measure WF-2 to reduce potentially significant impacts. Mitigation Measure WF-2 requires the inclusion of fire-resistant landscaping into the landscape design and landscape plans, which would be submitted to the City and reviewed as part of the building permit review process. In addition to the mitigation measures, the 2020 SCEA identified that the approved project would comply with all applicable building and safety codes, including the CBC and California Fire Code, and all applicable fire safety standards set forth by the City regarding fire protection. The approved project's new construction would be constructed with fire-resistant materials and equipped with standard safety features such as certified alarm systems, fire extinguishers, and fire sprinklers. The 2020 SCEA concluded that with the implementation of identified mitigation measures and compliance with all applicable building standards and fire safety requirements, impacts related wildfire risk would be less than significant.

The modified project would include modifications to the market rate housing component and reconfiguration of the number of buildings, parking, and 1-acre of shared open space. The modified project does not include any modifications to the approved project that would result in new significant or increased impacts. The modified project would develop the project in accordance with all applicable building and safety codes, including the CBC and California Fire Code, and all applicable fire safety standards set forth by the City. The modified project would continue to implement Mitigation Measures WF-1 and WF-2 identified in the 2020 SCEA and therefore, all impacts related to wildfire would remain less than significant as identified in the 2020 SCEA.

5.19.1 Mitigation Measures

There are no additional mitigation measures required as a result of the modified project. The following mitigation measures identified as part of the approved project would remain applicable to the modified project:

Mitigation Measure WF-1: Project Emergency Response and Preparedness Plan. An Emergency Response and Preparedness Plan shall be prepared for the project to ensure that future residents are informed and prepared to evacuate in the event of a wildfire emergency. The Plan shall include detailed guidelines for reasonably foreseeable emergencies and disasters that might occur in the project area, including a potential wildfire. The Plan shall include the following:

1. Emergency contact information for SRFD, SRPD, and property management
2. Responsibility for coordinating response in the event of an emergency
3. Requirements for residents' emergency preparedness
4. Identified evacuation routes for residents
5. Detailed emergency and disaster procedures

The Plan shall focus on actions that can be taken before, during, and after an emergency such that residents may be better prepared at any point during a possible emergency. The Plan shall be provided to all residents upon move-in and to management staff. The applicant shall provide a copy of the ERPP to the City, including SRFD and SRPD, for informational purposes.

Mitigation Measure WF-2: Fire Resistant Landscaping Plan. The proposed project landscaping plans shall include fire-resistant landscaping (consistent with the 2018 East Bay Municipal Utility District Firescape guidelines) and landscape design. The proposed project plans shall be submitted to the City and reviewed as part of the building permit review process.

5.20 CUMULATIVE IMPACTS

The 2020 SCEA identified that all cumulative impacts resulting from the approved project would be mitigated to less than significant levels with the implementation of mitigation measures identified in the 2020 SCEA. Additionally, the 2020 SCEA identified that the approved project would not result in substantial adverse effects on human beings either directly or indirectly, as all impacts identified in the 2020 SCEA would be either less than significant without mitigation or would be less than significant after incorporation of mitigation.

The modified project would not involve construction outside of the original approved project footprint and would not increase use of the project site or increase traffic around the project site. The modified project would not result in an increase of impacts identified in the 2020 SCEA or result in new impacts. All impacts resulting from the modified project would be equal to or less than impacts identified for the approved project. The modified project would continue to implement all applicable mitigation measures identified in the 2020 SCEA and therefore, impacts associated with the modified project would be less than significant.

6.0 CONCLUSION

Based on the above, as with the approved project, impacts associated with the modified project would remain less than significant as they are within the scope of impacts identified and evaluated in the adopted 2020 SCEA. No new or substantially more severe significant effects would occur, and no additional mitigation measures would be required.

APPENDIX A

April 26, 2022

Mr. Tyler Wood
Vice President of Development
LMC
429 9th Street, Suite 300
Oakland, CA 94607

Addendum to the *3575 Mendocino Avenue Traffic Impact Analysis*

Dear Mr. Wood;

W-Trans has completed a focused transportation impact analysis to determine any changes to the findings in the *3575 Mendocino Avenue Traffic Impact Analysis* (TIS), September 22, 2020, associated with the proposal to modify the housing types to be constructed at 3575 Mendocino Avenue in the City of Santa Rosa. This information supplements or modifies the details contained in the TIS.

Project Description

The project as approved and evaluated in the TIS included 162 affordable senior units and 370 market-rate units while the current proposal would reduce the number of market-rate units from 370 to 260 units while retaining the 162 affordable senior units.

Trip Generation

The anticipated trip generation for the previously approved project was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual*, 10th Edition, 2017, for "Senior Adult Housing – Attached" (LU #252), and "Multifamily Housing (Mid-Rise)" (LU #221). Because a new version of the *Trip Generation Manual* was published in 2021, rates from this 11th Edition were applied to the project as now proposed. Trips associated with the senior housing were estimated using rates for "Senior Adult Housing – Multifamily" (LU #252), while the market-rate units were estimated using the "Multifamily Housing (Mid-Rise)" (LU #221) rates.

It is noted that several of the trip generation rates have decreased in the 11th Edition of the *Trip Generation Manual* compared to the 10th Edition, some have not changed, and the a.m. rate for the market rate units increased. Based on application of these rates, the proposed project is expected to generate an average of 1,705 trips per day, including 128 a.m. peak hour trips and 142 trips during the p.m. peak hour. Compared to the project as previously evaluated and approved but using updated trip generation rates, the current proposal would result in 907 fewer trips on a daily basis, with reductions of 37 and 63 trips during the morning and evening peak hours respectively. While not presented in the table, the project would result in fewer trips regardless of the trip generation rates applied since there will be 110 fewer units, or a reduction of about 30 percent from what was previously evaluated. These results are summarized in Table 1.

Table 1 – Trip Generation Summary

Land Use	Units (du)	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
As Approved											
Senior Housing	162	3.70	599	0.20	32	11	21	0.26	42	23	19
Market-rate Housing	370	5.44	2,013	0.36	133	35	98	0.44	163	99	64
Approved Total			***2,612***		***165***	***46***	***119***		***205***	***122***	***83***
As Currently Proposed											
Senior Housing	162	3.24	525	0.20	32	11	21	0.25	41	23	18
Market-rate Housing	260	4.54	1,180	0.37	96	22	74	0.39	101	61	40
Proposed Total			***1,705***		***128***	***33***	***95***		***142***	***84***	***58***
Net Change			**-907**		**-37**	**-13**	**-24**		**-63**	**-38**	**-25**

Note: du = dwelling unit

Because the project would result in less trips being added to the street network and no adverse effects were identified for the project as previously evaluated, no update to the operational analysis appears to be warranted.

Pedestrian/Bicycle Access

Adequacy of facilities for pedestrians, bicyclists, and transit riders was re-evaluated based on the unit count for the project as now proposed, including a review of any pedestrian-related or bicyclist-related crashes. Collision records as maintained by the California Highway Patrol in their SWITRS database were reviewed and it was determined that three crashes were reported during the five-year period between August 1, 2016, and July 31, 2021. One bicycle crash each occurred near the intersections of Mendocino Avenue/ Fountaingrove Parkway and Mendocino Avenue/Bicentennial Way and one pedestrian crash occurred at Mendocino Avenue/Fountaingrove Parkway. No crashes were reported away from intersections, or in the vicinity of the bus stops.

Consideration was also given to the number of pedestrians that the project might be expected to generate. Based on person-trip information available in the 10th Edition of the *Trip Generation Manual* it was estimated that the market rate housing would generate 133 person trips during the a.m. peak hour and 192 during the p.m. peak hour. However, based on information available in the 11th Edition, the project would be expected to result in 13 pedestrian/bicycle/transit trips during the morning peak hour and 18 during the evening peak hour. These values are substantially lower than previously projected, and, given the site's proximity to the Kaiser hospital on the same side of Mendocino Avenue as well as the location of the bus stop on Bicentennial Way that serves several routes in the area, only a portion of these pedestrian trips would be expected to include a crossing of Mendocino Avenue.

Consideration was given to the potential need for warning devices at a designated location where pedestrians could cross Mendocino Avenue to reach the bus stop on the east side of the street. Such devices are typically not recommended where the pedestrian volume is less than 20 per hour. Given that considerably fewer than this would be expected based on the available data, such measures are not recommended. Based on this updated review, including the revised estimate of pedestrian crossings and review of the collision history, installation of a traffic signal or other devices such as rectangular rapid-flashing beacons (RRFBs) would not be warranted to accommodate pedestrian crossings of Mendocino Avenue, and therefore are not recommended.

Vehicle Miles Traveled (VMT)

Senate Bill (SB) 743 established the change in Vehicle Miles Traveled (VMT) as a result of a project as the basis for determining transportation impacts associated with proposed developments. In establishing its thresholds of significance for VMT analysis, the City relied upon guidance provided by the California Governor's Office of Planning and Research (OPR) in the publication *Transportation Impacts (SB 743) CEQA Guidelines Update and Technical Advisory*, 2018. The City's standards are outlined in the *Vehicle Miles Traveled Guidelines Final Draft*, June 2020. With respect to assessing VMT for residential projects, the final draft guidelines indicate that projects generating VMT per capita that is 15 or more percent below the countywide average are presumed to have a less-than-significant transportation impact. The OPR publication, as well as CEQA Guidelines Section 15064.3(b)(1) also indicate that "generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact."

OPR encourages the use of maps to identify low VMT areas for which the impacts could be presumed to be less than significant, allowing jurisdictions to "screen" projects in those areas from quantitative VMT analysis. The Sonoma County Transportation Authority (SCTA) prepared a draft residential screening map for the City of Santa Rosa, and, based on the project site location being within a screened area it is reasonable to conclude that the project would have a less-than-significant VMT impact.

We hope this information is adequate to address staff's questions. Thank you for giving us the opportunity to provide these services.

Sincerely,

Dalene J. Whitlock, PE, PTOE
Senior Principal

DJW/djw/SRO601.L1