

U.S. Department of Veterans Affairs Community-Based Outpatient Clinic

Challenger Way and Corporate Center Parkway, Santa Rosa, CA (Sonoma County)

Assessor's Parcel Nos. 035-112-034 and 035-112-035

CEQA Analysis §15183

Lead Agency:

City of Santa Rosa Planning and Economic Development Department 100 Santa Rosa Avenue, Room 3 Santa Rosa, CA 95404

Contact: Andrew Trippel, City Planner

Date: May 19, 2020

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INTRODUCTION

Ryan Companies has submitted an application for development of a U.S. Department of Veterans Affairs (VA) Community-Based Outpatient Clinic (Project). The proposed Project consists of a single-story 57,579-square-foot medical office building on an 8-acre site on Challenger Way between Corporate Center Parkway and Apollo Way in the area known as Northpoint Corporate Center.

The project site is located within the City of Santa Rosa and the planning area of the Santa Rosa General Plan 2035 (General Plan). The Santa Rosa City Council adopted the General Plan on November 3, 2009. The General Plan designates the project site as Business Park use.

This California Environmental Quality Act (CEQA) Analysis evaluates the environmental effects of the project. The project is eligible for CEQA streamlining and/or tiering provisions under CEQA Guidelines §15183, which provides for streamlined review when a project is consistent with a Community or General Plan for which the impacts of the plan have been analyzed in a certified program Environmental Impact Report (EIR).

This analysis uses CEQA streamlining and/or tiering provisions under CEQA Guidelines §15183 to tier from the program-level analysis completed in the City of Santa Rosa (City) General Plan and its EIR. The General Plan EIR is considered the Program EIR that analyzed environmental impacts associated with adoption and implementation of the General Plan.

This CEQA Analysis has also been prepared in accordance with the CEQA Guidelines §15168(c), Use With Later Activities, which states:

If an agency finds that pursuant to section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document would be required.

This CEQA Analysis under §15168 serves as the evaluation pursuant to the referenced §15162 of the CEQA Guidelines of whether new significant effects have been identified or new mitigation measures would be required. If new environmental effects are identified or new mitigation measures required for the project, additional CEQA documentation may be necessary.

GENERAL PLAN EIR

The Santa Rosa General Plan 2035 EIR was certified by the City in 2009. The project site is located within the bounds of the General Plan planning area. The General Plan EIR is a Program EIR under CEQA Guidelines §15168 and §15183. As such, subsequent activities under the General Plan are subject to requirements under each of the aforementioned CEQA sections.

The proposed project implements the primary goals of the General Plan. As Lead Agency, the City of Santa Rosa has opted to use this approach to conduct its review of this project under CEQA. The project is generally consistent with General Plan goals and polices, though the City has discretion to make their own consistency determination, and minor inconsistencies resulting from the project as proposed would not constitute a potentially significant impact that would preclude use of CEQA Guidelines §15168. As

The project site was previously within the Southwest Area Plan, which has been superseded by the General Plan.

such, the project may be found to be within the scope of the General Plan Program EIR and would not require further environmental review.

The following describes the Program EIR that constitutes the previous CEQA document considered in this CEQA Analysis. The Program EIR is hereby incorporated by reference and can be obtained from the City of Santa Rosa Department of Planning and Economic Development at 100 Santa Rosa Avenue, Room 3, Santa Rosa, CA 95404, and on the City of Santa Rosa Planning Division website at: https://srcity.org/392/General-Plan.

ENVIRONMENTAL EFFECTS SUMMARY - GENERAL PLAN EIR

The 2009 General Plan EIR determined that development consistent with the General Plan would result in the following impacts that would be reduced to a level of less than significant with the implementation of mitigation measures: air quality/climate change (odors) and biological resources (conflict with habitat conservation plans).

Less than significant impacts were identified for the following topics in the General Plan EIR: visual resources; air quality/climate change (clean air plan consistency, air pollution emissions); biological resources (riparian areas and sensitive communities, special status species, habitat, wildlife corridors, wetlands); cultural resources; energy; geology, soils, and seismicity; hazards/hazardous materials; hydrology and water quality; land use; noise; open space and agriculture; parks/recreation; population, housing, and employment; public services; transportation/circulation (bicycle and pedestrian facilities demand, transit demand, safety, parking demand); and utilities/service systems.

Significant unavoidable impacts were identified for the following environmental topics in the General Plan EIR: air quality/climate change (conflict with regional air quality plan, conflict with GHG plan); transportation/circulation (intersection operations, roadway segment operations). Due to the potential for significant unavoidable impacts, a Statement of Overriding Considerations was adopted as part of the City's approvals.

PROJECT CONSISTENCY WITH COMMUNITY PLAN OR ZONING: CEQA GUIDELINES §15183

CEQA Guidelines §15183 allow streamlined environmental review for projects that are "consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site." §15183(c) specifies that an EIR does need to be prepared for the project "if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards."

The following analysis provides substantial evidence to support a conclusion that the project qualifies for streamlined review under CEQA Guidelines §15183 as a project consistent with the development density established by existing zoning community plan, or general plan policies for which an EIR was certified.

Criterion §15183 (a): General Plan, Community Plan, and Zoning Consistency

Yes No

☐ The project is consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified.

The project site is within the Northpoint Corporate Center in the southwest portion of the City General Plan Planning Area. This area contains a mix of commercial, institutional, and park uses. Public transit is provided by Sonoma County Transit and Santa Rosa CityBus bus routes located within 0.25 mile of the project site.

The project site is zoned Business Park (BP) per the City of Santa Rosa Zoning Code. The BP zoning district is applied to areas appropriate for planned, visually attractive centers for business that do not generate nuisances (noise, clutter, noxious emissions, etc.). This zone accommodates campus-like environments for corporate headquarters, research and development facilities, offices, light manufacturing and assembly, industrial processing, general service, incubator-research facilities, testing, repairing, packaging, and printing and publishing. Warehousing and distribution, retail, hotels, and residential uses are permitted on an ancillary basis. Restaurants and other related services are permitted as accessory uses. Outdoor storage is not permitted. The BP zoning district is consistent with and implements the Business Park land use classification of the General Plan. The allowable density for the BP zoning district is 350 square feet per employee.

The Project is a medical office building established in a campus-like environment, consistent with use types permitted in the Business Park zone. The project's gross building area is approximately 57,579 square feet and project employment is anticipated to be approximately 200 employees, which would result in a density of approximately 288 square feet per employee—within the allowable density for the BP zone. The project would also meet applicable setbacks. As such, the project would conform to the Business Park land use designation, and it would be consistent with and permitted under the BP zoning. As Table 1 demonstrates, the project would also be consistent with the relevant policies of the General Plan.

TABLE 1: EVALUATION OF CONSISTENCY WITH GENERAL PLAN

Relevant Policies, Principles, and Guidelines of the General Plan	Project Consistency
LUL-J-1. Maintain an adequate supply of employment centers in a variety of locations and settings to ensure the city's continued economic vitality.	Consistent. The project would consist of the development of a new VA community-based outpatient clinic, which is anticipated to provide employment for approximately 200 full-time positions.
LUL-R. Establish rational patterns of population densities, transportation, and services	Consistent. The project would consist of the development of a new VA community-based outpatient clinic on an undeveloped lot in the existing Northpoint Corporate Center, which also includes other medical services.
UD-A-4. In new developments, minimize overall grading by limiting site grading to the minimum necessary for driveways, parking areas, and understructure areas.	Consistent. Development of the project would require minimal grading across the site to accommodate the new medical office building, parking lots, and landscaping. The site has been previously improved and is currently maintained through regular disking in anticipation for future development.
UD-A-5. Require superior site and architectural design of new development projects to improve visual quality in the city.	Consistent. The project would be designed pursuant to California Building Code and other applicable codes, and would be subject to Design Review approval by the City.
UD-A-12. Promote green building design and low impact development projects.	Consistent. The project would be designed pursuant to California Building Code and other applicable codes, including CAL Green, and would be subject to Design Review approval by the City.
UD-A-13. Review guidelines for parking lots trees to ensure adequate summertime shading.	Consistent. The project's landscape design includes numerous new tree plantings throughout the parking lots.
UD-D-2. Maintain a uniform setback of structures from the street. Require parking areas to be placed to the side or rear of structures, not in front.	Consistent. The parking lots associated with the project would be placed on the north side of the building and the western half of the front of the building. Accessible parking spaces would be provided on either side of the building entry. The project would have a 25-foot building setback along Apollo Way.
T-B-2. Locate uses generating heavy traffic so that they have direct access or immediate secondary access to regional/arterial streets or highways.	Consistent. The project would consist of the development of a new VA community-based outpatient clinic which would serve approximately 1,500 veterans daily. Access to the site would be provided from Challenger Drive (public) and Apollo Way (staff / emergency), both of which connect with Corporate Center Parkway, a regional / arterial street.
OSC-I-2. Require non-residential projects requesting Conditional Use Permit or Design Review approval to provide water efficient landscaping in accordance with the city's Water Efficient Landscape Policy.	Consistent. The proposed project is seeking Design Review approval and would provide water efficient landscaping in accordance with the city's Water Efficient Landscape Policy.
OSC-J-1. Review all new construction projects and require dust abatement actions as contained in the CEQA Handbook of the Bay Area Air Quality	Consistent. The project would be required to implement measures identified by BAAQMD as Basic Construction Management Practices to reduce construction-related

Management District.

OSC-K-1. Promote the use of site planning, solar orientation, cool roofs, and landscaping to decrease summer cooling and winter heating needs. Encourage the use of recycled content construction materials.

OSC-K-5. Implement measures of the Climate Action Plan, which increase energy efficiency, including retrofitting existing buildings and facilitating energy upgrades.

NS-F-2. Require that hazardous materials used in business and industry are transported, handled, and stored in accordance with applicable local regulations.

emissions and fugitive dust, as discussed in section III, Air Quality.

Consistent. The project landscape plan includes numerous new tree plantings throughout the site that will generate shade, as well as other landscaping that will reduce the heat island effects from paving materials to help reduce summer cooling needs.

Consistent. The project would implement numerous measures identified in the Climate Action Plan, including construction-related measures 6.1.3, 9.2.1, 9.2.2, and 9.2.3, as well as operational measures 1.1.1, 1.3.1, 1.4.2, 1.4.3, and 9.1.3. The construction-related measures include diversion of construction waste and reduction of construction vehicle emissions. Operational measures include compliance with CALGreen Tier 1 standards, tracking energy use, and the preservation and provision of trees on the project site.

Consistent. The project would consist of the development of a new VA community-based outpatient clinic, which would include the handling, storage, and transport of small quantities of hazardous materials, waste, and biomedical waste. The project would be required to conform to federal and state laws as well as local laws, ordinances, and procedures regarding the proper handling, use, and disposal of hazardous materials, as discussed in section IX, Hazards and Hazardous Materials.

Based on the above, the project is consistent with the development density established by existing zoning, community plan, or General Plan policies for which an EIR was certified. The project therefore qualifies as a Project Consistent with a Community Plan or Zoning pursuant to CEQA Guidelines §15183.

Because the project is consistent with the development assumptions for the land use classification and the site as provided under the General Plan EIR, the project's potential contribution to cumulatively significant effects has already been addressed in the prior EIR. CEQA Guidelines §15183 applies to the project, which allows for streamlined environmental review. This document considers whether there are project-specific effects peculiar to the project or its site, and relies on the streamlining provisions of CEQA Guidelines §15183 to address cumulative effects.

SUMMARY OF CEQA FINDINGS

An evaluation of the proposed project is provided in the CEQA Analysis below. This evaluation concludes that the project requires no additional environmental review and the project is consistent with the development density and land use characteristics established by existing zoning and General Plan policies for which an EIR was certified (i.e., the Program EIR). As such, the project would be required to comply with the applicable mitigation measures identified in the General Plan EIR. With implementation of any applicable mitigation measures, the project would not result in a substantial increase in the severity of significant impacts or any new significant impacts that were not previously identified in the previous EIR.

In accordance with Public Resources Code §21083.3 and §21094.5, and State CEQA Guidelines §15183, and as set forth in this CEQA Analysis, the project qualifies for CEQA tiering/streamlining because the following findings can be made.

Consistency with Community Plan or Zoning (CEQA Guidelines §15183): The project is consistent with the development density established by existing zoning and General Plan policies for which an EIR was certified (i.e., the Program EIR). The project is consistent with the Program EIR and would not result in significant impacts that were not previously identified as significant project-level, cumulative, or offsite effects in that EIR.

The project is permitted in the zoning district where the project site is located (BP) and is consistent with the bulk, density, and land use standards envisioned in the General Plan and the Municipal Code. The analysis presents substantial evidence that there would be no significant impacts peculiar to the project or its site, and that the project's potentially significant effects have already been addressed as such in the Program EIR, or will be substantially mitigated by the imposition of mitigation measures identified in that EIR. No further environmental documents are required in accordance with CEQA Guidelines §15183.

Program EIR (CEQA Guidelines §15168): The analyses in the 2009 General Plan EIR and this CEQA Analysis demonstrate that the proposed project would not result in substantial changes or involve new information that would warrant preparation of a subsequent EIR, per CEQA Guidelines §15162, because the level of development proposed for the site is within the broader development assumptions analyzed in the previous EIR. The effects of the project have been addressed in the prior EIR and no further environmental documents are required in accordance with CEQA Guidelines §15168(c).

Cherry	June 17, 2020
Signature	Date

ENVIRONMENTAL CHECKLIST

The CEQA Checklist that follows provides a summary of the potential for new or more severe environmental impacts that may result from implementation of the proposed project as compared to impacts identified in the certified General Plan EIR (2009). This CEQA Checklist hereby incorporates by reference the analysis of all potential environmental impact topics included in the prior environmental document. The significance criteria from the prior CEQA document have been consolidated and updated in certain portions of this CEQA Checklist for administrative purposes. This CEQA Checklist provides a determination of whether the proposed project would result in:

- equal or less severity of impact as previously identified in the General Plan EIR (2009);
- substantial increase in the severity of previously identified significant impacts as disclosed in the General Plan EIR (2009); or
- new significant impacts.

Where the severity of the impacts of the project would be the same as or less than the severity of the impacts described in the Program EIR, the box for Equal or Less Severity of Impact is marked (■). If the checkbox for Substantial Increase in Severity of Previously Identified Significant Impact or New Significant Impact were to be marked (■), that would indicate that there are significant impacts that are either:

- peculiar to the project or project site (pursuant to CEQA Guidelines §15183);
- not identified in the Program EIR (per CEQA Guidelines §15183), including offsite and cumulative impacts (per CEQA Guidelines §15183);
- due to substantial new information not known at the time the Program EIR was certified (per CEQA Guidelines §15183).

In such a circumstance, a new EIR would be required for the project. As demonstrated in the following CEQA Checklist, the proposed project would not result in a substantial increase in the severity of any previously identified significant impacts, and no new significant impact would result from the project.

The checklist uses the acronym SU for significant and unavoidable, LTS for less than significant, LTS w/MM for impacts that are reduced to LTS with implementation of identified Mitigation Measures, and NI for no impact.

The proposed project is required to comply with applicable mitigation measures identified in the General Plan EIR (2009), as well as with applicable City of Santa Rosa Standard Measures. The project sponsor (Ryan Companies) has agreed to incorporate and/or implement the required applicable mitigation measures and Standard Measures as part of the proposed project. This CEQA Checklist includes references to these measures. If the CEQA Checklist inaccurately identifies or fails to list an applicable mitigation measure or Standard Measure, the applicability of that mitigation measure or Standard Measure to the proposed project is not affected.

PROJECT INFORMATION

1. Project Title: U.S. Department of Veterans Affairs Community-Based

Outpatient Clinic

2. Lead Agency Name & Address: City of Santa Rosa

Planning and Economic Development Department

100 Santa Rosa Avenue, Room 3 Santa Rosa, California 95404

3. Contact Person & Phone Number: Andrew Trippel, City Planner

Phone: 707.543.3223 Email: atrippel@srcity.org

4. **Project Location:** The project site is located in the City of Santa Rosa, Sonoma

County, California at Challenger Way and Corporate Center Parkway, Assessor's Parcel Nos. 035-112-034 and 035-112-035.

5. Project Sponsor's Name & Address: Ryan Companies

4275 Executive Square, Suite 370

La Jolla, CA 92037

Megan Maki Project Manager

megan.maki@ryancompanies.com

(p) 858.812.7918

6. General Plan Designation: Business Park

7. Zoning: BP – Business Park

8. Description of Project:

The project sponsor is proposing to construct a new community-based outpatient clinic on an undeveloped 8-acre site in Santa Rosa, California (**Figures 1** and **2**). The medical office building would be a one-story, 22-foot-high outpatient facility, and 420 surface parking spaces would be provided (**Figure 3**).

The medical office building would be constructed on the southeastern portion of the site and would have a footprint of approximately 57,579 square feet. Medical office uses would comprise the majority of the floor area. The remaining area would accommodate the lobby areas, restrooms, stairwells, elevator, janitorial, data rooms, and electrical rooms (**Figure 4**). Mechanical equipment would be located on the roof and screened from public view.

Primary vehicular access to the site would be provided via the proposed full-access driveway from Challenger Drive to the covered passenger drop-off area in front of the entry and the west parking area. Staff and service vehicles would enter the site from Apollo Way and park in the north parking area. An ambulance bay would be provided at the rear of the building and would be used for patient pick-up and transport. The surface parking areas would accommodate 395 regular vehicle parking spaces, 7 handicap spaces, 5 van accessible spaces, and 13 motorcycle spaces. Short-term bicycle parking would be provided near the public and employee building entrances, accommodating parking for 10 bicycles and 5 bicycles, respectively.

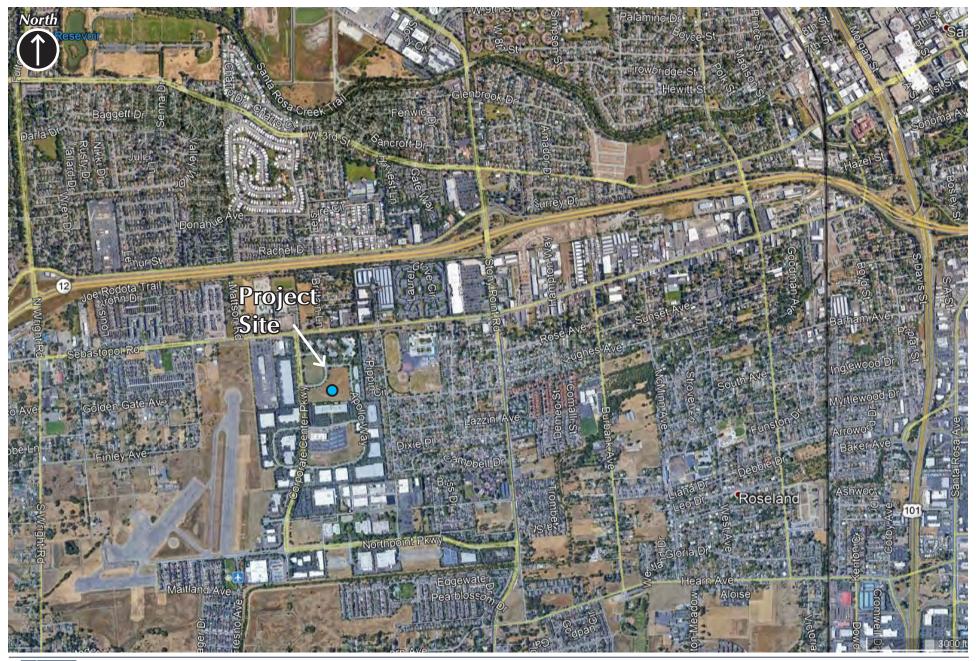




Figure 1. Project Vicinity

May 2020





Figure 2. Project Site
May 2020





Figure 3. Preliminary Site Plan
Source: JTW Development
May 2020





Pedestrian access would be provided via sidewalks along the perimeter of the site that connect to other sidewalks in the vicinity. Two bus stops are within 0.25 mile of the project site. The Corporate Center Parkway and Sebastopol Road stop is served by Sonoma County Transit bus route 22. Santa Rosa CityBus Route 2 provides service to the bus stop at Corporate Center Parkway and Mercury Way.

The project design includes landscaping within the site and around the perimeter—to include a mix of trees, shrubs, and ground cover—as detailed in the landscape plan (**Figure 5**). The landscaped areas would also accommodate bioswales for stormwater treatment. Outdoor seating would be provided at the southwestern building exterior, along with an open space lawn area, healing garden, and exterior activity area. The existing ground cover and spray irrigation system would be replaced with low water use plants and a drip irrigation system, consistent with the City's Water Efficient Landscape Ordinance requirements. Twelve of the existing trees along the site perimeter are proposed for removal due to their poor condition or to accommodate the new driveway entrance to the project site. These trees would be replaced by new plantings, and other existing on-site trees would remain and be protected during construction.

The project would include site improvements such as hardscape, storm drain, and utility connections. Onsite utilities would include gas, electricity, domestic water, wastewater, and storm drainage. All on-site utilities would be designed in accordance with applicable codes and current engineering practices.

Project Construction

The project is currently in the design phase of development and the following construction information is assumed for the purpose of this analysis. On-site construction work is expected to include tree removal, limited excavations for the foundation, footings, and utility services; grading and surface preparation; utility connections; and building construction, and would span approximately 14 months. The first two months would consist of site preparation and grading. The remainder of the construction period would consist of installing utilities, building construction, site paving, and implementing the landscape plan. Staging would occur as much as possible within the project site. Street frontages may need to be used at times for deliveries and removal of materials and equipment, subject to City review and approval.

Project Approvals

The City of Santa Rosa is the lead agency with the authority for approving or denying the project, which would require the following approvals and actions:

- Design Review
- Building permits

9. Surrounding Land Uses and Setting:

The project site consists of an undeveloped site within the Northpoint Corporate Center. Existing vegetation consists of ruderal species and several mature trees. An artificial ditch bisects the site. The site is maintained through regular disking.

A variety of Business Park uses surround the site, including the adjacent Kaiser Northpoint medical office building to the south. Other surrounding properties are developed with one- and two-story office and industrial facilities with surface parking. An undeveloped lot lies to the northeast of the project site. Roadways in the immediate vicinity include Corporate Center Parkway, Challenger Way, Capricorn Way, and Apollo Way. Residential uses lie further to the north, east, and west.

The project site is within the General Plan planning area and is designated and zoned for Business Park uses.





Figure 5. Preliminary Landscape Plan

Source: BC Engineering Group *May 2020*

10. Other Public Agencies whose Approval is Required:

Independent of this CEQA review, the project was determined to be categorically excluded from further review under the National Environmental Policy Act.

No other public agency approvals are required for the proposed project.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Pursuant to Public Resources Code §21080.3.1, the California Native American tribes traditionally and culturally affiliated with the project area have been contacted to inform them of the project and so they may request consultation. To date, no tribes have requested consultation pursuant to Public Resources Code §21083.3.2.

I. AESTHETICS

				Propos	ed Project	
		General Plan EIR Findings with	Genera	onship to ll Plan EIR ıdings		
	Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
a)	Have a substantial adverse effect on a scenic vista?	LTS	•		None	NI
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	LTS	•		None	NI
c)	Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LTS	•		None	LTS
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LTS	•		None	LTS

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to aesthetics and visual resources.

PROJECT IMPACT DISCUSSION

I (a): No Impact. The project site is in a flat, urban area of Santa Rosa, is not a designated scenic corridor, and is not located on a street that is designated as a Scenic Road in the Santa Rosa 2035 General Plan. There are no scenic vistas in the vicinity. Once constructed, the 22-foot high building would not obstruct a scenic view.

No impact on scenic views would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

I (b): No Impact. The site is not located near a state scenic highway. No impact on scenic resources within a scenic highway would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

I (c): Less than Significant. As noted above, the project would not obstruct a scenic view. The project site is located in the Northport Corporate Center business park, in an area characterized by a mix of single-story commercial and residential uses, including some medical uses. Development of the project would add a new

medical office building of similar scale and bulk as other buildings in the area. This infill development would help unify the visual character of development in the area, and would provide an overall positive improvement to the existing visual character of the area (**Figures 6a, 6b, 7a, and 7b**). The project would be contemporary in design and include amenities such as landscaping and outdoor seating. Additionally, the City will review the proposed design as part of the entitlement approval process to ensure that the design is consistent with existing zoning and regulations governing scenic quality.

The visual effects of the project's tree removal would be addressed through tree replacement. All trees proposed for removal would be replaced pursuant to Chapter 17-24 of the Environmental Protection Ordinance.

Consistent with the General Plan EIR, the project's impact related to scenic quality would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

I (d): Less than Significant. Lighting in the project vicinity is typical for an urban area. The proposed medical office project would add to the existing light sources with building, parking lot, and landscape lighting (Figure 8). The lighting design for the project would be required to be sensitive to neighboring land uses and to minimize energy use. Project compliance with the City's Zoning Code and design guidelines would reduce light and glare associated with the project to levels consistent with surrounding uses. Increases at the closest residential and commercial uses would be consistent with the existing urban conditions.

Consistent with the General Plan EIR, the project's impact related to light and glare would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

Standard Measures

- Design Review is required for the project. Design Review will be obtained prior to issuance of a building permit.
- A standard condition of approval regarding exterior lighting requirements will be placed on the project.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to aesthetics or visual resources that were not identified therein. The Program EIR did not identify any mitigation measures related to aesthetics or visual resources that would apply to the project, and none would be needed.



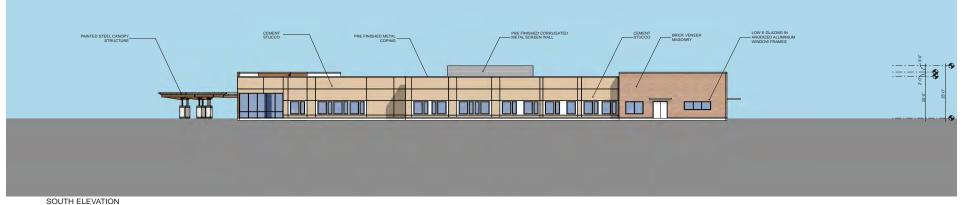






Figure 6b. Project Rendering - Entry Source: JTW Development May 2020







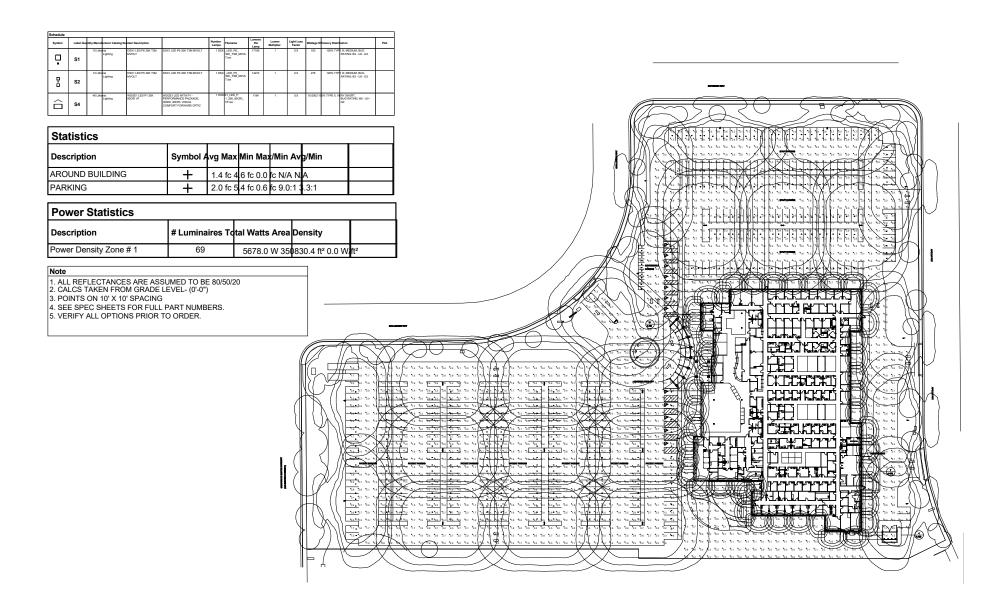


WEST ELEVATION
SCALE 3/32' = 1'- 0'











II. AGRICULTURE AND FORESTRY RESOURCES

		Proposed Project				
	General Plan EIR Findings with Implementation of Mitigation Measures (if required)	Genera	onship to ll Plan EIR ndings	Applicable Mitigation Measures	Level of Significance	
Impact Topics		Equal or Less Severity	Substantial Increase in Severity			
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:						
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	LTS	•		None	NI	
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	LTS	•		None	NI	
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production(as defined by Government Code section	LTS	•		None	NI	

51104(g))? d) Result in the loss of forest land or conversion of forest land to non-LTS NI None forest use? e) Involve other changes in the existing environment which, due to their location or nature, could LTS result in conversion of Farmland, None NI to non-agricultural use or conversion of forest land to nonforest use?

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to agriculture and forestry resources.

PROJECT IMPACT DISCUSSION

II (a-e): No Impact. The project site is not identified as being prime farmland, unique farmland, or farmland of statewide or local importance pursuant to the Farmland Mapping and Monitoring Program of the California Resource Agency and is not under a Williamson Act contract. The project site does not contain forest land or timber resources and is not zoned as forest land or for timber production. The current zoning for the project site is BP-Business Park, and adjacent properties are similarly designated. There are no existing agricultural or forestry uses in the immediate area.^{2, 3} The proposed project would not conflict with existing agricultural or forest land zoning or the Williamson Act. No impact would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to agriculture and forestry resources that were not identified therein. The Program EIR did not identify any mitigation measures related to agriculture and forestry resources that would apply to the project, and none would be needed.

² City of Santa Rosa, Santa Rosa General Plan 2035. November 2009. Available at: https://srcity.org/392/General-Plan

³ City of Santa Rosa GIS Information. Website accessed 1.15.20 at https://srcity.org/829/GIS-Maps-Documents

III. AIR QUALITY

			Project			
Impact Topics		General Plan EIR Findings with		nip to General R Findings		
		Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
sig est ain po be fol	here available, the mificance criteria tablished by the applicable quality management or air llution control district may relied upon to make the lowing determinations.					
a)	Conflict with or obstruct implementation of the applicable air quality plan?	SU (Bay Area Ozone Strategy)	-		None available	NI
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	SU (ozone)	•		None available; Implement Standard Measures	LTS
c)	Expose sensitive receptors to substantial pollutant concentrations?	LTS	•		None	LTS
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS w/MM	•		MM 4.D-4 not applicable to the project; Implement Standard Measures	LTS

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified a significant and unavoidable impact relative to consistency with the Bay Area Air Quality Management District's (BAAQMD) 2005 Bay Area Ozone Strategy, and a less than significant impact with mitigation related to odors. The General Plan EIR also identified a less than significant impact related to construction emissions and fugitive dust.

Odor impacts are reduced through location of land uses consistent with the General Plan to avoid conflicts and policies related to industrial zone buffers and a cleaner city vehicle fleet as well as Mitigation Measure 4.D-4, which discusses siting and filtration for residential uses. Construction emission and fugitive dust related impacts are minimized through compliance with the BAAQMD regulations and inclusion in all construction projects of their recommended construction dust mitigation measures per General Plan policy OSC-J-1.

PROJECT IMPACT DISCUSSION

III (a): No Impact. The BAAQMD 2005 Bay Area Ozone Strategy has since been updated as the 2017 Clean Air Plan. The project site is subject to the Bay Area Clean Air Plan, last adopted by BAAQMD (in association with the Metropolitan Transportation Commission and the Association of Bay Area Governments) in 2017 to meet state requirements and those of the federal Clean Air Act. As required by state law, updates are developed approximately every three years. The Clean Air Plan is meant to demonstrate progress toward meeting the ozone standards, and includes other elements related to particulate matter, toxic air contaminants, and greenhouse gases.

A project is judged to conflict with or obstruct implementation of the Clean Air Plan if it is inconsistent with regional growth assumptions or hinders implementation of air pollution emissions control strategies. The land use proposed for the project is consistent with the Santa Rosa General Plan designation for the project site and the project would not hinder or obstruct implementation of any control measures identified in the Clean Air Plan. The project advances emissions reductions by adhering to the Santa Rosa General Plan air quality policies and actions to reduce air pollutants within Santa Rosa. Specifically, the project would adhere to dust abatement actions required under General Plan Policy OSC-J-1 and transportation policies that would reduce air emissions from vehicle travel, including Policies T-A-1 (promotion of transit service, provision of bicycle facilities), T-B-2 (direct/secondary access to arterial streets), T-H-5 (encourage transit ridership), T-K-1 and T-K-4 (provide pedestrian walkways), and T-L-8 (provide bicycle facilities).

Development of the proposed project is therefore expected to be consistent with the Clean Air Plan as it supports the primary goals, includes basic control measures, and would not result in any conflicts in implementing the Clean Air Plan.

No impact would occur. Impacts related to conflict with the regional air quality plan would therefore be within the scope of the General Plan EIR.

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

Short-term Construction Impacts. Construction activities associated with the project would generate fugitive dust in the short-term. Construction activities may result in significant quantities of fugitive dust emissions, including PM₁₀ and PM_{2.5}, on a temporary and intermittent basis during the construction period. Emissions from off-road vehicles and construction equipment may also contribute to criteria pollutant emissions.

BAAQMD has published screening criteria for air quality emissions from projects. Projects that do not exceed the screening criteria are presumed to have less than significant air quality effects. The construction emissions screening size for medical office building projects is 277,000 square feet. At 57,579 square feet, the project would not exceed applicable construction screening level sizes for criteria pollutants. Construction-related emissions of criteria pollutants would not be significant on a project-specific or cumulative basis. However, the project would be required to implement measures identified by BAAQMD as Basic Construction Management Practices. These measures would reduce construction-related emissions and fugitive dust.

Long-term Operational Impacts. Operational project emissions of criteria pollutants would result from both mobile emissions sources (such as vehicle trips) and area sources (such as consumer products or natural gas usage). The applicable BAAQMD-recommended screening size threshold for operational emissions of criteria pollutants for medical office building projects is 117,000 square feet. At 57,579 square feet, the project would not exceed applicable operational screening level sizes for criteria pollutants. Operational emissions of criteria pollutants would not be significant on a project-specific or cumulative basis.

Consistent with the General Plan EIR, the project's impact related to criteria pollutants would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

III (c): Less than Significant. Construction activities associated with the project would generate construction-related toxic air contaminant (TAC) emissions, specifically diesel particulate matter, from onroad haul trucks and off-road equipment exhaust emissions, resulting in increased cancer risk or non-cancer health concerns for nearby sensitive receptors. Due to the variable nature of construction activity, the generation of TAC emissions would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Construction-related emissions are not peculiar because the project would use standard construction equipment such as loaders, backhoes, cranes, and haul trucks, similar to other projects under construction in Santa Rosa. The site's proximity to sensitive receptors is typical of other project sites in this urbanized area. The project would be required to implement measures identified by BAAQMD as Basic Construction Management Practices that would reduce health risks to sensitive receptors from temporary construction emissions of diesel particulate matter.

The project is not a residential use and, as an outpatient medical office building, patients would stay for any significant length of time. The project itself is not considered a sensitive use with respect to TACs. The project site is located approximately 275 feet from the nearest sensitive residential uses to the east and the project would not be a substantial stationary source of TACs during operation. The project would not have a significant contribution to area traffic or associated emissions.

Consistent with the General Plan EIR, the project's air quality impact on sensitive receptors would be **less** than significant. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

III (d): Less than Significant. Operation of the medical office would not result in other emissions—including odors—that would adversely affect a substantial number of people. During construction, diesel-powered vehicles and equipment would create odors that some may find objectionable; however, these odors would be temporary and not likely to be noticeable much beyond the project site's boundaries.

Consistent with the General Plan EIR, the project's impact related to odors would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

Standard Measures:

- The Applicant and contractor(s) shall implement basic air quality construction measures recommended by the BAAQMD, including the following:
 - Water all active construction areas (staging, parking, soil piles, unpaved driveways, etc.) at least twice daily.
 - Cover all hauling trucks transporting materials offsite.
 - Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas.
 Sweep streets daily (with water sweepers) if visible soil material is deposited onto adjacent roads.
 - Limit traffic speeds on any unpaved roads to 15 mph.
 - Suspend construction activities that cause visible dust plumes that extend beyond the construction site.
 - A certified mechanic shall verify that equipment is properly tune and maintained in accordance with manufacturer specifications.

- Idling times shall be limited to 5 minutes or less pursuant to the "no idling" rule for in-use offroad diesel-fueled vehicles. Signage shall be posted at the construction site indicating the idle time limitation.
- Post a publicly visible sign with the telephone number of designated person and person to contact at the City of Santa Rosa regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to air quality that were not identified therein. Mitigation Measure 4.D-4 identified in the Program EIR related to air quality would not apply to the project, and no additional mitigation measures would be needed.

IV. BIOLOGICAL RESOURCES

		Proposed Project				
		General Plan EIR Findings with	Relationship to General Plan EIR Findings			
	Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	LTS	•		None	LTS
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	LTS	•		None	LTS
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	LTS	•		None	LTS
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	LTS	•		None; Implement Standard Measures	LTS
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTS	•		None; Implement Standard Measures	LTS
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	LTS w/MM	•		(MM 4.F-5 Not applicable to the project)	LTS

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant for special status plant and animal species, riparian habitat or other sensitive communities. It also concluded that potential conflicts with the Santa Rosa Plain Conservation Strategy (SRPCS) related to loss of California tiger salamander (Ambystoma californiense), Burke's goldfields (Lasthenia burkei), Sonoma sunshine (Blennosperma bakeri), Sebastopol meadowfoam (Limnanthes vinculans), many-flowered navarretia (Navarretia leucocephala ssp. plieantha), and their habitat or other wetlands in the Santa Rosa Plain would be less than significant with mitigation.

Potential impacts on special-status plant and animal species were reduced through policies related to collaboration with other agencies, preservation of high-quality habitats, and use of existing regulations and procedures. Impacts on riparian habitat or other sensitive communities were reduced through policies related to creek setbacks and preservation of high-quality habitats, as well as through General Plan policies that address protection and preservation of high-quality wetlands and vernal pools (policies OSC-D-1, OSC-D-2, and OSC-D-5). The potential for conflict with the SRPCS was mitigated through implementation of Mitigation Measure 4.F-5, requiring consistency with the measures in the SRPCS or individual assessment.

PROJECT IMPACT DISCUSSION

IV (a-d): Less than Significant. An Endangered Species Act Survey report was completed for the project and is included as **Appendix A** to this document. In addition to the site survey results, the report includes search results for the project site from the U.S. Fish and Wildlife Services' Information, Planning and Conservation System and the California Natural Diversity Database. This section includes a summary of the report findings and the search results.

The generally flat project site consists of undeveloped ruderal disturbed habitat that has been regularly disked, and there are several homeless encampments located along the site perimeter. The site is bordered by roadways and office buildings on the north and east sides; by a Kaiser Permanente medical building on the south side; and by roadways, office buildings, and a vacant lot on the west side. Commercial and residential uses lie in the project vicinity. Elevation in the project area is approximately 108 feet above mean sea level. Santa Rosa Creek is located approximately 4,320 feet north of the project site.

No native or naturalized plant communities were observed at the project site and none have the potential to occur due to lack of suitable habitat and regular disking of the site. No federally listed or state-listed animal species were observed and none would be expected to occur due to lack of suitable habitat. A list of all plant and animal species observed on the site is included as Attachment C to the Endangered Species Act Survey report.

The project site has been mapped as part of Critical Habitat for the California tiger salamander (*Ambystoma californiense*), and an assessment was conducted to determine the potential for the site to be occupied by this species. The survey found that the project site lacks all three primary constituent elements of the Sonoma population of California tiger salamander habitat, which include breeding, upland, and dispersal habitats. The report determined that there is no potential for California tiger salamander to occur on the site for the following reasons:

- the lack of aquatic habitat that could support breeding
- the upland habitat is of poor value and could not support the species
- the site is separated from the nearest suitable habitat by a business park and roadways with no suitable dispersal corridors

⁴ HELIX Environmental Planning, Inc., Santa Rosa Endangered Species Act Survey, Santa Rosa, Sonoma County, California, July 2019.

The project site does not contain any riparian habitat or other sensitive natural communities, wetlands, or wildlife corridors. Candidate, sensitive, or special status species are unlikely to occur in the project vicinity due to its highly disturbed and urbanized nature; however, tree removal during construction activities would have the potential to disturb nesting birds. City of Santa Rosa Standard Measures related to nesting birds would apply.

Consistent with the General Plan EIR, the project's impact on special status species, habitat, wetlands, and wildlife corridors would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

IV (e-f): Less than Significant. The SRPCS, developed in coordination with the U.S. Fish and Wildlife Service, identifies eight conservation areas for California tiger salamander and listed plants, one California tiger salamander and listed plant preserve system, and one listed plant conservation area.. The project site is within the SRPCS boundaries, but has been identified as "Already Developed (no potential for impact)." 5

Twelve of the existing trees on site are proposed for removal due to their poor condition or to accommodate the new driveway entrance to the project site. These trees would be replaced pursuant to Chapter 17-24 of the City's Environmental Protection Ordinance, and other existing on-site trees would remain and be protected during construction, as outlined in the applicable Standard Measures.

Consistent with the General Plan EIR, the project's impact related to conflicts with local, regional, or state biological resource policies or plans would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

Standard Measures:

- If project construction is to occur between February 1 and August 31 a qualified biologist shall conduct pre-construction surveys of all potential nesting habitats within 500 feet of project activities. If nesting birds are identified within the survey area, a non-disturbance buffer determined in coordination with the California Department of Fish and Wildlife should be established around the nest tree during the breeding season or until the young have fledged. If preconstruction surveys indicate that nests are inactive or potential habitat is unoccupied, no further mitigation measures are required. Raptor or other bird nests initiated during construction are presumed to be unaffected and no buffer is necessary. However, the "take" of any individuals is prohibited.
- Tree Replacement Prior to the issuance of a certificate of occupancy, the applicant shall comply with the tree replanting requirements indicated in Santa Rosa Municipal Code, and specifically the following: The total trunk diameter of the non-heritage trees to be removed is 105 inches, which will result in thirty-six (36) ornamental trees required as mitigation. A fee of \$100 per replacement tree may be paid in-lieu of planting replacement trees onsite to the City of Santa Rosa Department of Recreation and Parks. No heritage tree mitigation is required as no heritage trees will be removed.
- The project developer will be required to comply with all grading, landscaping and pruning
 provisions consistent with requirements of the City's Tree Ordinance. This will include, but not be
 limited to the following:
 - a. Install temporary protective fencing at the edge of the dripline or at the edge of the approved construction line prior to grading on the site. Fencing shall be maintained for the duration of

U.S. Fish and Wildlife Service, Sacramento Field Office, Santa Rosa Conservation Strategy, Figure 3, Santa Rosa Plain Conservation Strategy Map, available at: https://www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/santa-rosa-strategy.php.

- construction. The project Arborist shall approve all fence locations prior to placement. No fencing shall be removed without the project Arborist's approval.
- b. Maintain existing grade within the fenced portion of the dripline. Route drainage swales and underground work outside the dripline where possible.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to biological resources that were not identified therein. Mitigation Measure 4.F-5 identified in the Program EIR related to biological resources would not apply to the project, and no additional mitigation measures would be needed.

V. CULTURAL RESOURCES

			Proposed Project				
		General Plan EIR Findings with	Relationship to General Plan EIR Findings				
	Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance	
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to Public Resources Section 15064.5?	LTS	•		None	NI	
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Public Resources Section 15064.5?	LTS	•		None; Implement Standard Measures	LTS	
c)	Disturb any human remains, including those interred outside of formal cemeteries?	LTS	-		None; Implement Standard Measures	LTS	

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to historic and cultural resources.

PROJECT IMPACT DISCUSSION

V (a): No Impact. There are no buildings on the project site. The proposed project would have no impact on a historical resource as defined under CEQA. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

V (b-c): Less than Significant. A Cultural Resources Records Search report was completed for the project and is included in Appendix B to this document.⁶ The Northwest Information Center (NWIC) records search included a review of the National Register of Historic Places, the California Register of Historical Resources, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Historic Resources Inventory list. The NWIC records search identified 17 previously conducted studies within a 0.5-mile radius of the project site, including 1 covering the project site. The study, which consisted of a pedestrian survey and limited soil sampling, did not identify any cultural resources. The NWIC records search also identified 11 cultural resources within a 0.5-mile radius of the project site, with 1 archeological site located approximately 2,120 feet from the project site. No cultural resources are known to exist within or directly adjacent to the project site. A search of the Native American Heritage Commission Sacred Lands File had positive results for the

⁶ Rincon Consultants, Inc., Cultural Resources Records Search for the Challenger Way Project, Santa Rosa, Sonoma County, California, October 2018.

project site. The City contacted the list of tribes provided by the Native American Heritage Commission on October 30, 2018, and again on January 29, 2020. No response has been received to date.

Given the previously disturbed nature of the project site, minimal amount of disturbance of native soils during construction, and the lack of Native American Tribes response to AB 52 outreach, it can be concluded that the project would not have the potential to significantly affect any Sacred Lands in the vicinity of the project site. However, because cultural resources were identified within a 0.5-mile radius of the project site during the NWIC search, with one archeological site located approximately 2,120 feet from the project site, implementation of standard measures related to cultural resources will be required. The project will also be required to comply with any recommendations provided in the Phase I archaeological survey report.

The inadvertent discovery of archaeological resources and human remains during construction activities, including ground-disturbing activities, could nonetheless occur and implementation of City of Santa Rosa Standard Measures related to cultural resources would be required.

Consistent with the General Plan EIR, the project's impact on archaeological resources and human remains would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

Standard Measures:

- Prior to demolition or other ground disturbance, a qualified professional archaeologist shall conduct a Phase I survey of the site consisting of further archival and field study to identify archaeological resources and including a good faith effort to identify archaeological deposits that may show no indications on the surface. In the event archaeological resources or human remains are discovered on-site, these resources would be handled according to applicable regulations (Public Resources Code Sections 21083.2, 21084.1, 5097.98, 15064.5(d) and/or Section 7050.5 of the Health and Safety Code).
- If cultural resources are discovered during the project construction (inadvertent discoveries), all work in the area of the find shall cease and a qualified archaeologist and representatives of the appropriate tribe shall be retained by the project sponsor to investigate the find and make recommendations as to treatment and mitigation of any impacts to those resources.
- If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Sonoma County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within a reasonable timeframe. Subsequently, the Native American Heritage Commission shall identify the "most likely descendant." The most likely descendant shall then make recommendations, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to cultural resources that were not identified

If a Sacred Lands Inventory search reveals that a Native American cultural resource is in a project area, the NAHC provides a list of the California Native American Tribes that are traditionally and culturally affiliated to the project area so that the CEQA lead agency may consult with the Tribes to discuss avoidance, preservation in place, or mitigation of impacts to any Native American cultural resources in a project area.

therein. The Program apply to the project, ar	EIR did not identify nd none would be nee	any mitigation medded.	easures related to	cultural resources	that would

VI. ENERGY

		Proposed Project			
	General Plan EIR Findings with	Relationship to General Plan EIR Findings			
Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	LTS	•		None	LTS
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	LTS	•		None	LTS

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to increased need for and inefficient use of energy. This impact is minimized through requirements for energy-efficient site planning and building design.

PROJECT IMPACT DISCUSSION

VI (a-b): Less than Significant. Construction and operation of the project would result in the consumption of fuel for construction vehicles and equipment and for vehicles accessing the site during operation of the site. The project would be required by the City to comply with all standards of Title 24 of the California Code of Regulations and CALGreen standards, as applicable, incorporating energy-conserving design and construction. The project is anticipated to have similar energy requirements as other similar modern developments in the vicinity. Although construction and operation of the project would incrementally increase energy consumption, it would comply with all applicable regulations and energy standards, and its use of energy would not be wasteful, inefficient, or unnecessary. The project would also include implementation of measures identified in the City's Climate Action Plan related to energy use and efficiency (see section VIII, Greenhouse Gas Emissions).

Consistent with the General Plan EIR, the project's impact related to energy resources would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to energy resources that were not identified therein. The Program EIR did not identify any mitigation measures related to energy resources that would apply to the project, and none would be needed.

VII. GEOLOGY AND SOILS

			Proposed Project			
		General Plan EIR Findings with Implementation of	Genera	onship to Il Plan EIR ndings		
Impact Topics		Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
po efi	rectly or indirectly cause stential substantial adverse fects, including the risk of loss, jury, or death involving:					
i)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42)	LTS	•		None; Implement Standard Measures	LTS
ii)		LTS	•		None; Implement Standard Measures	LTS
iii) Seismic-related ground failure, including liquefaction?	LTS	•		None; Implement Standard Measures	LTS
iv)	Landslides?	LTS	•		None; Implement Standard Measures	LTS
or su	esult in substantial soil erosion the loss of topsoil, creating bstantial risks to life, property, creek/waterways?	LTS	-		None	LTS
so we re po la: su	e located on a geologic unit or il that is unstable, or that ould become unstable as a sult of the project, and tentially result in on- or off-site ndslide, lateral spreading, bsidence, liquefaction or llapse?	LTS	•		None; Implement Standard Measures	LTS
de Ui cre	e located on expansive soil, as fined in Table 18-1-B of the niform Building Code (1994), eating substantial direct or direct risks to life or property?	LTS	•		None; Implement Standard Measures	LTS

e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	N/A		None	NI
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LTS	•	None	NI

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to seismic hazards and paleontological resources. Seismic hazards are minimized through policies related to location and inspection of critical facilities, avoidance of high-risk areas, and requirement of geotechnical investigations prior to construction.

PROJECT IMPACT DISCUSSION

VII (a, c-d): Less than Significant. Santa Rosa is located within a seismically active area of California. The City is subject to geological hazards primarily related to earthquakes due to the presence of active faults. Most notably the City has a designated Alquist Priolo Fault Zone extending through the City's downtown area; the fault zone is designated over the faults known as Roger's Creek Fault and the Healdsburg Fault. The City is also susceptible to the movement of the Bay Area's other active faults including the San Andreas Fault.

The project site is not located in an area identified on Figure 12-3 of the General Plan as high risk for seismic hazards such as fault rupture, violent ground shaking, unstable slopes, and landslides. Any site-specific seismic hazards or soils risks (e.g., liquefaction potential, expansive soils) would be identified through the Preliminary Soils Report for the Project, prepared pursuant to California Building Code requirements (Chapter 18: Soils and Foundations, Section 1803: Geotechnical Investigations). As a condition of City Building permit approvals, all approved recommended actions of the Soils Investigation must be incorporated in the construction of the building to prevent structural damage. The project will be required to comply with the geotechnical investigation, and will be built to meet the California Building Code requirements for sufficient structural foundations given site-specific soil conditions.

Consistent with the General Plan EIR, the project's impact related to seismic hazards and unstable or expansive soils would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

VII (b): Less than Significant. Development of the project would involve construction activities (e.g., grading) on an approximately 8-acre site, resulting in the potential for erosion and sedimentation of downstream receiving waters. Erosion control standards are set by the Regional Water Quality Control Board (RWQCB) and administered through the National Pollutant Discharge Elimination System (NPDES) permit process which requires implementation of best management practices to reduce the amount of constituents, including eroded sediment, that enter streams and other water bodies. The project would be required to comply with all regulatory and permit requirements related to erosion control.

Consistent with the General Plan EIR, the project's impact related to soil erosion would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

VII (e): No Impact. The soils in relation to septic systems are not of concern for this project because the project would include connection to City sewer systems for wastewater disposal and would not include use of a septic system. No impact would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

VII (f): No Impact. The project site is located in a developed urban area. There are no unique geological or paleontological features on the project site or in the City of Santa Rosa. Construction activities would result in ground disturbance, but the expected minimal grading depth needed for the building foundation and footings would not be expected to result in the discovery of paleontological resources. No impact would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

Standard Measures:

- Comply with Building Code requirements.
- The applicant shall adhere to all recommendations listed in the Preliminary Geotechnical Investigation/Soils Investigation for the project, and with subsequent recommendations from additional design-level studies that shall be completed as part of the Building Permit process.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to geology and soils that were not identified therein. The Program EIR did not identify any mitigation measures related to geology and soils that would apply to the project, and none would be needed.

City of Santa Rosa, Santa Rosa General Plan 2035. November 2009. Available at: https://srcity.org/392/General-Plan.

VIII. GREENHOUSE GAS EMISSIONS

				Proposed Project				
		General Plan EIR Findings with	Relationship to General Plan EIR Findings					
	Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance		
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	SU	•		None available; Implement measures from Santa Rosa Climate Action Plan	LTS		
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	SU	•		None available; Implement measures from Santa Rosa Climate Action Plan	LTS		

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified significant and unavoidable cumulative impacts related to generation of greenhouse gas (GHG) emissions and possible conflicts with implementation of GHG reduction efforts. The General Plan EIR found that policies encouraging lower-impact site planning and construction methods, energy conservation, and solar power would reduce the impact, but may not reduce cumulative GHG emission to a level of less than significant.

Subsequent to adoption of the General Plan, the City adopted the Santa Rosa Climate Action Plan (CAP). The purpose of this Climate Action Plan is to present measures which will reduce local greenhouse gas emissions, to meet state, regional and local reduction targets, and to streamline future environmental review of projects within Santa Rosa by following the CEQA Guidelines and meeting BAAQMD expectations for a Qualified GHG Reduction Strategy. All new projects are required to demonstrate compliance with the Santa Rosa CAP as part of the standard project approval process to ensure development is consistent with City GHG reduction goals and efforts.

PROJECT IMPACT DISCUSSION

VIII (a-b). Less than Significant: The proposed project would result in the generation of GHG emissions during construction and operation. Construction activities would generate GHG emissions from heavy-duty construction equipment, worker trips, and material delivery and hauling. Construction GHG emissions are short-term and would cease once construction is complete. Operation of the proposed project would result in GHG emissions from onsite lighting, heating, and cooling of the medical office building, as well as the treatment and transport of water and wastewater for the life of the project. Additionally, GHGs from operation would result from vehicle trips associated with workers, patients, and deliveries to the site.

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

demonstrate the City's ability to reach a GHG reduction target of 25% below 1990 levels, by year 2020. Emissions reductions were also quantified for three other years: 2010, 2015 and 2035. Emissions reductions for 2010 demonstrated the emissions reduction progress that the City had already made by implementing measures of the CAP, while the 2015, 2020 and 2035 emissions reductions indicated the potential reductions that will be achieved by implementation of these measures over the next several years.

BAAQMD's identified thresholds of significance for land use development projects (i.e., the project) through the year 2020 are:

- annual emissions less than 1,100 metric tons per year (MT/yr) of carbon dioxide equivalent (CO2e), or
- annual emissions of 4.6 MTCO₂e/service population/yr (residents + employees), or
- compliance with a qualified GHG Reduction Strategy

BAAQMD has not yet updated their recommended GHG emissions thresholds to address target reductions past year 2020. However, consistent with current State directives (AB 32 and AB 398), the updated target is expected to require an additional 40% reduction in GHG emissions by year 2030. Applied to the BAAQMD 2020 service population threshold, this would equate to standard of 2.8 MTCO₂e per year per service population, by year 2030. The Santa Rosa CAP calculated GHG emissions reductions with implementation of the CAP not just for comparison to the 2020 targets but also out to year 2035, to be consistent with the planning horizon of the General Plan. As summarized on page ES-7 of the CAP, implementation of the measures of the Santa Rosa CAP are expected to decrease GHG emissions to 2.3 MTCO₂e per person per year by year 2035. While this timeframe is 5 years after an assumed 2030 target threshold, the CAP notes that a reduction to 2.9 MTCO₂e per person per year in 2020, and with assumed steady reductions over time, it can be concluded that emissions would be below 2.8 MTCO₂e per person per year (or a 40% reduction below 2020 thresholds) by year 2030.

The Santa Rosa CAP demonstrates that it would meet the anticipated State 2030 GHG emissions reductions targets. If the project can demonstrate consistency with the Santa Rosa CAP, its impacts related to GHG emission by year 2030 would be considered less than significant and fully consistent with State GHG emissions reduction requirements, with no need to quantify project-specific emission. This is consistent with BAAQMD guidelines related to the analysis of projects under the 2020 GHG emissions reduction targets, as applied to the updated 2030 targets.

The items listed in the Santa Rosa CAP Checklist for New Development (**Appendix D**) are included below, with a description of whether and how the project complies with each measure. To be determined in compliance with the CAP, all measures denoted with an asterisk are required in all new development projects, unless otherwise specified. If a project cannot meet one or more of the mandatory requirements, substitutions may be made from other measures listed at the discretion of the Community Development Director.

Mandatory Measures:

1.1.1 Comply with CALGreen Tier 1 standards*

The project has been designed to meet or exceed CALGreen Tier 1 standards. Such standards have been incorporated into building orientation, locally sourced natural materials and materials with a large recycled content, water conservation and energy reduction, landscaping with drought-tolerant native plants watered by weather-based drip irrigation, and rooftop photovoltaic panels.

1.1.3 After 2020, all new development will utilize zero net electricity*

Since the time the CAP was adopted, the California Energy Commission has determined that it is not possible to achieve net zero GHG emissions from electricity use on a wholesale basis, and "net zero" has been removed from the California Energy Codes. The CAP provides that, if a project cannot

meet one or more of the mandatory requirements (i.e., net zero emissions from electricity use), substitutions may be made from other measures listed, at the discretion of the Community Development Director. The Community Development Director has determined that strict compliance with CAP Goal 1, Measure 1.1.3 (zero net GHG emissions from electricity use) is not achievable and is not required of all projects, but that compliance with current California Green Building Code Standards (which do apply to all projects) is an acceptable substitution. As indicated under Measure 1.1.1 (above), the project has been designed to meet or exceed CALGreen's Tier 1 energy requirements, thereby meeting the acceptable substitution measure. Strict compliance with CAP Goal 1, Measure 1.1.3 is not achievable and not required.

1.3.1 Install real-time energy monitors to track energy use*

The project has been designed to include the installation of real-time energy monitoring.

1.4.2 Comply with the City's tree preservation ordinance*

The project will comply with the City's tree preservation ordinance. The project includes tree removal and replacement plantings, and the Applicant will seek the prior approval of the Director as required by the ordinance. For each tree with a diameter of six inches or fraction thereof that are approved for removal, two trees of a species approved by the Director, each of a minimum 15-gallon container size, will be planted on the project site.

1.4.3 Provide public & private trees in compliance with the Zoning Code*

In addition to the planned preservation of most existing street trees on the site, new trees are proposed throughout the parking lot and landscaped areas, including replacement plantings for the 12 trees proposed for removal. A detailed landscaping plan conforming to the Santa Rosa Zoning Code and Santa Rosa Design Review Landscape Standards has been submitted as part of project application for review and approval by the City.

- 1.5 Install new sidewalks and paving with high solar reflectivity materials*
 Light colored concrete and pavers will be used for sidewalks and pedestrian areas. Asphalt paving is planned for the parking lots, shaded by tree plantings to help reduce the heat island affect.
- 4.1.2 Install bicycle parking consistent with regulations*

The project would provide short-term outdoor bicycle parking for clients and employees, and the project would also provide long-term bicycle storage and shower facilities, all in compliance with Zoning Code Section 20-36.090.

- 4.3.5 Encourage new employers of 50+ to provide subsidized transit passes*

 The project will employ more than 50 people and subsidized transit passes will be provided.
- 5.1.2 Install electric vehicle charging equipment*

The project would include 10 electric vehicle charging stations in the visitor parking area, as indicated on Figure 3, consistent with CalGreen Buildings Standards.

5.2.1 Provide alternative fuels at new refueling stations*

This measure is not directly applicable to the project as it is not a refueling station.

6.1.3 Increase diversion of construction waste*

The project will strive for 50% or better diversion of construction waste in compliance with Ordinance 9-14.050, which requires recycling of 50% of construction and demolition debris.

7.1.1 Reduce potable water use for outdoor landscaping*

To reduce potable water use, plant material selections will be drought-tolerant, climate-appropriate, and irrigated in hydro zones by an automatic irrigation system with weather-sensing controls.

- 7.1.3 Use water meters which track real-time water use*
 - The project will include installation of water meters which track real-time water use.
- 7.3.2 Meet on-site meter separation requirements in locations with current or future recycled water capabilities*

Meter separation and dual plumbing systems for potable and recycled water are included in the project design.

9.1.3 Install low water use landscapes*

The landscape plan for the project includes drought-tolerant and climate-appropriate plant material selections.

9.2.1 Minimize construction equipment idling time to 5 minutes or less*

Idling times are restricted to 5 minutes or less by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations and also specified in policy OSC-J-1 of the General Plan. The project will comply with this regulation as well as BAAQMD requirements for construction equipment.

- 9.2.2 Maintain construction equipment per manufacturer's specs*

 The project will comply with policy OSC-J-1 of the General Plan, which specifies this requirement.
- 9.2.3 Limit GHG construction equipment emissions by using electrified equipment or alternative fuels*

 The Applicant will include provisions in contractor agreements encouraging the use of electrified equipment or equipment using alternative fuels.

As indicated above, the project complies with all mandated Checklist items of the Santa Rosa CAP for new development projects, thereby meeting the CAP requirements for consistency, and its GHG emissions are therefore determined to be less than significant. The project's consistency with additional Santa Rosa CAP measures (non-mandatory) is also listed below:

- 2.1.3 Pre-wire and pre-plumb for solar thermal or PV systems
 - The project will not include pre-wiring or pre-plumbing for solar thermal or PV systems.
- 3.1.2 Support implementation of station plans and corridor plans

This item is not applicable to the project as it is not located within a station or corridor plan.

- 3.2.1 Provide on-site services such as ATMs or dry cleaning to site users
 - The project is an inclusive medical office building, which has been programmed to limit the need for outside support services. Support services incorporated within the proposed project include a pharmacy, laboratory, and imaging.
- 3.2.2 Improve non-vehicular network to promote walking, biking
 - The project would provide sidewalks along roadway frontages with connections to the building. The project also would provide bicycle parking near the building entry. Class II bicycle facilities are available on the adjacent Corporate Center Parkway.
- 3.2.3 Support mixed-use, higher-density development near services
 - This item is not directly applicable to the project. The project is consistent with the type and density of development anticipated for the project location.

3.3.1 Provide affordable housing near transit

This item is not directly applicable to the project. The project is consistent with the type and density of development anticipated for the project location.

3.5.1 Unbundle parking from property cost

This item is not directly applicable to the project, as unbundling of parking generally refers to residential unit purchase or rental; the project is not a residential project.

3.6.1 Install calming features to improve ped/bike experience

The project vicinity has been developed with roadways, curbs and sidewalks consistent with City plans for area locomotion. See item 3.2.2 for details of on-site pedestrian and bicycle features. Public roads are tree-lined and sidewalks are meandering and separated from the street by landscaping.

4.1.1 Implement the Bicycle and Pedestrian Master Plan

Class II bicycle facilities are available on the adjacent Corporate Center Parkway and connect to existing and proposed bicycle facilities consistent with the Bicycle and Pedestrian Master Plan. The project includes on-site pedestrian and bicycle connections.

4.1.3 Provide bicycle safety training to residents, employees, motorists

No bicycle safety training will be provided.

4.2.2 Provide safe spaces to wait for bus arrival

The US Department of Veterans Affairs will continue to operate a patient shuttle service, estimated to serve approximately 60 to 70 patients arriving daily, with 7 shuttle buses arriving and departing each day. Space is provided at the project entry for convenient drop-off and pick-up associated with this shuttle bus system.

4.3.2 Work with large employers to provide rideshare programs

No ridesharing program will be provided.

4.3.3 Consider expanding employee programs promoting transit use

The project will provide subsidized transit passes for employees, and will continue to operate the VA shuttle system for patients. No other transit-related employee programs will be provided.

4.3.4 Provide awards for employee use of alternative commute options

No employee awards will be provided for alternative transportation use.

4.3.7 Provide space for additional park-and-ride lots

This item is not directly applicable to the project, which would not be considered a good location for a park-and-ride lot.

4.5.1 Include facilities for employees that promote telecommuting

This item is not directly applicable to the project. Telecommuting is not generally an option for medical office employees.

8.1.3 Establish community gardens and urban farms

This item is not directly applicable to the project, which is a site intended for Business Park development.

9.1.2 Provide outdoor electrical outlets for charging lawn equipment

Outdoor electrical outlets for charging of gardening equipment will be provided.

Based on the CAP Checklist comparison provided above, the project demonstrates that it is in compliance with Santa Rosa CAP requirements (although the City retains the ability to impose further conditions if deemed necessary). As a project consistent with the General Plan and the Santa Rosa CAP, the project would not result in a new significant GHG emissions impact, and would not result in GHG emissions greater than previously disclosed in the General Plan EIR or the subsequent CAP. The project's contribution to GHG impacts would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR and the Santa Rosa CAP.

The project is also located within the Sebastopol Road Corridor, a Priority Development Area (PDA) as designated in Plan Bay Area 2040. As noted in Plan Bay Area 2040, these PDAs leverage existing infrastructure to minimize development impacts on communities. A local city council or board of supervisors nominates a PDA, which is then adopted by the Association of Bay Area Governments (ABAG) Executive Board. PDAs must be within an existing community, within a half-mile of frequent transit (e.g., transit service along the Sebastopol Road corridor), and in an area planned for future housing and job growth. PDAs are an important part of the strategies and performance of Plan Bay Area 2040, which is ABAG's and the Metropolitan Transportation Commission's long-range land use and transportation plan for our region, as well as the region's most current Sustainable Communities Strategy for the Bay Area. As such, the project would also be consistent with applicable regional plans and policies specifically adopted for the purpose of reducing GHG emissions.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to GHG emissions that were not identified therein. The Program EIR did not identify any mitigation measures related to GHG emissions that would apply to the project, and none would be needed.

Metropolitan Transportation Commission. Website accessed at: http://opendata.mtc.ca.gov/datasets/56ee3b41d6a242e5a5871b043ae84dc1_0?geometry=-122.774%2C38.419%2C-122.692%2C38.431

IX. HAZARDS AND HAZARDOUS MATERIALS

				Propos	ed Project	
		General Plan EIR Findings with	Genera	ionship to al Plan EIR adings		
	Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LTS	-		None	LTS
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	LTS	•		None	LTS
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LTS	•		None	LTS
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	LTS	•		None	NI
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	LTS	•		None	NI
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	N/A			None	NI
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	LTS	•		None	NI

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to development on lots containing hazardous materials and the transport, use, and storage of hazardous materials. Potential impacts are minimized through handling in accordance with applicable regulations and restrictions on facilities handling large quantities of hazardous materials.

PROJECT IMPACT DISCUSSION

IX (a-b): Less than Significant. The proposed project would involve the development of a medical office building. Construction and operation activities associated with the project would involve the routine transport, use, and disposal of hazardous materials.

Short-term Construction Impacts. Construction activities would involve the use of certain hazardous materials such as fuels, oils, solvents, and glues. Inadvertent release of large quantities of these materials into the environment could adversely affect workers, the public, soil, or water quality. Implementation of construction best management practices (BMPs) as part of a Stormwater Pollution Prevention Plan (SWPPP) would minimize the potential for adverse effects to workers, the public, soils, and water quality.

Long-term Operational Impacts. Within the regulatory framework of the Medical Waste Management Act, the Medical Waste Management Program of the California Department of Health Services ensures the proper handling and disposal of medical waste throughout the state. The Sonoma County Department of Health Services enforces the Medical Waste Management Act in Sonoma County. In addition, the California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act) requires that any business that handles hazardous materials prepare a business plan. This plan must include floor plans of the facility and business conducted at the site, an inventory of hazardous materials that are handled or stored on the site, an emergency response plan, and a safety and emergency response training program.

Operation of the project as a medical facility would include the handling, storage, and transport of hazardous materials, waste, and biomedical waste. These chemicals and other materials are primarily used during patient care, laboratory testing and medical diagnostics, and equipment maintenance. The project would not be expected to handle, store, or transport these materials in large quantity; smaller quantities of hazardous materials can be transported to and used on-site in compliance with applicable regulations. The California Department of Toxic Substances Control regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. The California Occupational Safety and Health Administration regulations concerning the use of hazardous materials in the workplace require employee training, safety equipment, accident and illness prevention programs, hazardous substance exposure warnings, and emergency action and fire prevention plans. The Radiological Health Branch of the California Department of Public Health administers the state's Radiation Control Law, which governs the use, transportation, and disposal of sources of ionizing radiation, to the extent that such substances may be used or transported at the project site at inception or at a future date.

The project would be required to conform to federal and state laws as well as local laws, ordinances, and procedures regarding the proper handling, use, and disposal of hazardous materials. State and federal hazardous waste regulations establish criteria for identifying, packaging, and labeling hazardous wastes; prescribe management of hazardous waste; establish permit requirements for hazardous waste treatment, storage, disposal, and transportation; and identify hazardous wastes that cannot be disposed of in landfills.

Consistent with the General Plan EIR, the project's impact related to the use or upset of hazardous materials would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

IX (c): Less than Significant. The project site is within 0.25 mile of Lawrence Cook Middle School, located to the northeast at 2480 Sebastopol Road. As noted above, hazardous materials used during construction and operation of the medical office building would be used in compliance with applicable regulations. Project compliance with applicable regulations would reduce the potential exposure of students to hazardous materials.

Consistent with the General Plan EIR, the project's impact related to the emission or handling of hazardous materials near a school would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

IX (d): No Impact. A Phase I Environmental Site Assessment was completed for the project and is included as **Appendix C** to this document. The report includes a government database search to identify any sites in the vicinity, including the project area, listed as a Cortese site or as a hazardous materials site. No sites were identified. The report concluded that there were no identified Recognized Environmental Conditions or Controlled Recognized Environmental Conditions in connection with the site. **No impact** would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

IX (e): No Impact. The project is not located within the boundaries of an airport land use plan or located in proximity to a private airstrip; the nearest airport is the Charles M. Schulz—Sonoma County Airport located approximately 6 miles north of the project site. No impact would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

IX (f): No Impact The proposed project is not expected to impair the implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. The project is limited to development of the site. The project area roadways and site access would not be substantially altered. New construction would not impair or interfere with emergency response or emergency evacuation. The project would incorporate all requirements to accommodate emergency response vehicles including fire engines. The proposed project would retain sufficient emergency vehicle access throughout all phases of construction. No impact would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

IX (g): No Impact: The project site is generally bounded by other developed areas. There are no wildlands located on or adjacent to the project site. No impact would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to hazards and hazardous materials that were not identified therein. The Program EIR did not identify any mitigation measures related to hazards and hazardous materials that would apply to the project, and none would be needed.

Terracon Consultants, Inc., Phase I Environmental Site Assessment, Proposed Veterans Affairs Center, Southwest Corner of Capricorn Way and Apollo Way, Santa Rosa, Sonoma County, California, August 2019.

X. HYDROLOGY AND WATER QUALITY

			Proposed Project			
		General Plan EIR Findings with	Genera	ionship to al Plan EIR ndings		
	Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	LTS	•		None	LTS
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LTS	•		None	LTS
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:	LTS	•		None	LTS
	i) result in substantial erosion or siltation on- or off-site;	LTS	•		None	LTS
	 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; 	LTS	•		None	LTS
	iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	LTS	•		None	LTS
d)	In flood hazard, tsunami or seiche zones, risk release of pollutants due to project inundation?	LTS	•		None	NI
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LTS	•		None	LTS

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to polluted stormwater runoff, erosion, and flood risk.

PROJECT IMPACT DISCUSSION

X. (a, e): Less than Significant. Construction activities associated with the project could adversely affect water quality through the potential discharge of construction materials and wastes to the stormwater collection system. The delivery, handling, and storage of construction materials and wastes, as well as use of construction equipment, could also introduce the risk of stormwater contamination.

The project applicant must file for coverage under and comply with the Statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Stormwater associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ, as amended)¹¹ and comply with RWQCB Order No. R1-2009-0045, MS4 NPDES Stormwater Permit. Erosion control requirements are stipulated in the NPDES Permit issued by the RWQCB. These requirements include the implementation of a SWPPP that contains BMPs. The implementation of BMPs would reduce the adverse effects of construction-related erosion, siltation, and contamination.

Under the existing condition, nearly the entire project site is pervious surface area. Development of the project would create more than 1 acre of new impervious area, and the project is therefore required to follow the 2017 Storm Water Low Impact Development Technical Design Manual (which supersedes the Standard Urban Storm Water Mitigation Plan). Applicable projects are required to design and implement post-development measures for the management of stormwater quality and quantity. As required by the Storm Water Low Impact Development Technical Design Manual, the proposed project would include preparation of a Storm Water Mitigation Plan to mitigate post-construction water quality impacts.

The project would implement stormwater source and treatment controls to treat project runoff from surface parking, roof runoff from the proposed building, and runoff from other related impervious surfaces, including sidewalks. The preliminary stormwater plan for the project includes stormwater runoff capture and treatment through landscaped and bioretention areas that would treat 100% of the project's impervious area (**Figure 9**).

The project would be consistent with policies and regulations related to stormwater pollutants. The project's stormwater system is required to be consistent with BMPs in the City's Stormwater Low Impact Development Technical Design Manual and a SWPPP prior to issuance of construction permits.

Consistent with the General Plan EIR, the project's impact on water quality would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

X. (b): Less than Significant. The proposed project is not expected to involve substantial excavation that would affect groundwater. Dewatering activities are not anticipated to be necessary, but if subsequently determined to be required, any dewatering activities associated with the proposed project must comply with the General Construction Permit and requirements established by the North Coast RWQCB to ensure that such activities would not result in substantial changes in groundwater flow or quality. Although the project would increase the impervious surface area, landscaping and stormwater capture would allow groundwater recharge to continue. The project would use potable water from the City's water system for onsite water needs. Additionally, the project's water demand is consistent with what is anticipated in the General Plan

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¹¹ https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

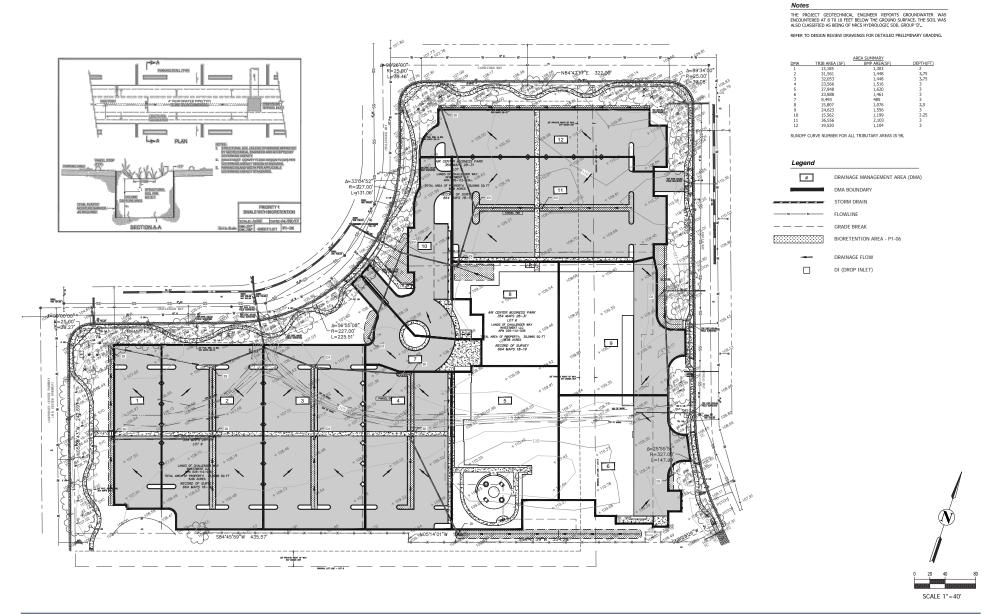




Figure 9. Preliminary Stormwater Plan Source: BC Engineering Group May 2020

and Urban Water Management Plan. The project would not substantially increase water use, deplete groundwater supplies, or interfere with groundwater recharge.

Consistent with the General Plan EIR, the project's impact on groundwater would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

X. (c): Less than Significant. The project site is currently undeveloped and drains naturally. Construction of the project would create new impervious area resulting in increased potential for stormwater runoff. Construction activities (e.g., grading) on the approximately 8-acre site could result in erosion and sedimentation of downstream receiving waters. The project would add new connections to the existing storm drain system in the adjacent roadways (Challenger Way and Apollo Way).

To minimize stormwater runoff, the project would incorporate suitable stormwater control BMPs in compliance with NPDES requirements. The biotreatment measures proposed for the project would result in improved groundwater infiltration at the site (see Figure 9). The project's final stormwater control plan would be designed in accordance with NPDES provisions requiring maintenance of stormwater flow rates from the site and would increase the treatment capability of the overall stormwater management system surrounding the project site.

Consistent with the General Plan EIR, the project's impact on the rate or amount of surface water runoff and capacity of the existing stormwater drainage system would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

X. (d): No Impact. The project site is not within a 100-year flood zone, ¹² and, at more than 15 miles inland from the Pacific Ocean, it is not within a tsunami zone. Further, the site is not located near an inland body of water. The project site is not at risk for inundation from flood hazard, tsunamic, or seiche. **No impact** would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

Standard Measures:

- Submit landscape and irrigation plans in conformance with the Water Efficient Landscape Ordinance adopted by the Santa Rosa City Council, Resolution No. 27518, on November 17, 2009. Plans shall be submitted with the Building Permit application. Submit the following with the abovementioned plans: Maximum Applied Water Allowance (Appendix A) and Hydrozone Table (Appendix B).
- In accordance with the National Pollution Discharge Elimination System regulation, the applicant shall prepare and implement a Storm Water Low Impact Development Submittal (SWLIDS) prior to construction. The SWLIDS shall address erosion and sediment controls, proper storage of fuels, identification of BMPs, and use and cleanup of hazardous materials. A Notice of Intent, fees, and other required documentation shall be filed with the RWQCB. During construction a monitoring report shall be conducted weekly during dry conditions and three times a day during storms that produce more than 1/2" of precipitation.
- A Final Storm Water Low Impact Development Submittal (SWLIDS) using Low Impact Development (LID) Best Management Practices (BMP) is to be included with the Building Permit application. Delete if not applicable: All private SWLIDS structures are to be located outside of Public Right of Way and Public Utility Easements. All SWLIDS details and improvements are to be included in the Building Permit Site Plans.

Federal Emergency Management Agency. National Flood Hazard Layer Viewer. Flood Insurance Rate Map Panel 06097C0717F, October 16 2012. Website accessed 2.3.20 at: https://hazardsfema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd.

• Developer's engineer shall comply with all requirements of the City Low Impact Development Technical Design Manual using Best Management Practices (BMPs). Final Plans shall address the storm water quality and quantity along with a maintenance agreement or comparable document to assure continuous maintenance of the source and treatment.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to hydrology and water quality that were not identified therein. The Program EIR did not identify any mitigation measures related to hydrology and water quality that would apply to the project, and none would be needed.

XI. LAND USE AND PLANNING

		Proposed Project			
	General Plan EIR Findings with	Relationship to General Plan EIR Findings			
Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
a) Physically divide an established community?	LTS			None	NI
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	LTS	•		None	NI

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to land use.

PROJECT IMPACT DISCUSSION

The site is designated Business Park on the Santa Rosa General Plan land use diagram, and the project's consistency with General Plan policies has been evaluated in the Project Consistency with Community Plan or Zoning section of this document (see Table 1).

XI (a): No Impact. The medical office building project would be constructed on an existing undeveloped parcel that is surrounded by existing business park development within the Northpoint Corporate Center area. Existing development includes the adjacent Kaiser Northpoint medical office building to the south, and one- and two-story office and industrial facilities to the west, north, and east. An undeveloped lot lies to the northeast.

Division of an established community typically occurs when a new physical feature physically transects an area, thereby removing mobility and access within an established community. The division of an established community can also occur through the removal of an existing road or pathway, which would reduce or remove access between a community and outlying areas. There are no aspects of the project that would substantially reduce mobility or access. Therefore, the project would not divide an established community.

No impact would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

XI (b): No Impact. The project is consistent with the development standards and zoning code requirements for Business Park use. The project site is surrounded by similar Business Park uses and would not create direct incompatibilities with surrounding land uses.

The project is substantially consistent with the policies in the General Plan, including those identified above in Table 1, and **no impact** would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to land use that were not identified therein. The Program EIR did not identify any mitigation measures related to land use that would apply to the project, and none would be needed.

XII. MINERAL RESOURCES

		Proposed Project			
	General Plan EIR Findings with		Relationship to General Plan EIR Findings		
Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	LTS	•		None	NI
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	LTS	-		None	NI

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to mineral resources.

PROJECT IMPACT DISCUSSION

XII (a-b): No Impact. The project site does not contain any locally or regionally significant mineral resources. ¹³ Therefore, the proposed project would not create an adverse impact upon locally or regionally significant resources. The City of Santa Rosa General Plan does not identify any locally important mineral resource locations on or near the project site. No impact would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to mineral resources that were not identified therein. The Program EIR did not identify any mitigation measures related to mineral resources that would apply to the project, and none would be needed.

City of Santa Rosa, Santa Rosa General Plan 2035. November 2009. Available at: https://srcity.org/392/General-Plan.

XIII. Noise

			Proposed Project			
		General Plan EIR Findings with	Relationship to General Plan EIR Findings			
	Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTS	•		None; Implement Standard Measures	LTS
b)	Generation of excessive groundborne vibration or groundborne noise levels?	LTS	•		None; Implement Standard Measures	LTS
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	LTS	•		None	NI

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant for noise from commercial uses and construction equipment, increased traffic noise levels, groundborne noise and vibration, and noise from the Charles M. Schulz-Sonoma County Airport. Policies in the General Plan would minimize impacts from construction and commercial uses.

A potentially significant impact could occur should the established ambient noise limits be exceeded by 5 decibels or more.

PROJECT IMPACT DISCUSSION

XIII (a-b): Less than Significant. The City's General Plan Noise Element states that noise levels of 70 A-weighted decibels DNL (a measure of day/night noise level averages) is considered normally acceptable for the Office Buildings, Business Commercial and Professional land use category. The project fronts on Challenger Way, which is not listed as a regional/arterial street, and would not be a major source of noise or vibration. None of the roadways in the project vicinity have been identified in the General Plan as regional/arterial streets with substantial noise levels. The project vicinity is characterized by a mix of commercial and residential uses. The nearest sensitive receptors (residences) are located approximately 275 feet to the east of the project site.

Short-term Construction Impacts. Project construction activities would be typical for office development and would generate noise from activities such as site grading, foundation work, and framing. Use of heavy equipment and heavy trucks passing by during project construction activities could generate perceptible vibration in the immediate vicinity of the site. Noise impacts from construction activities would be short-term and temporary, and the project would be conditioned to comply with standard construction hours and with the City's Noise Ordinance.

Long-term Operational Impacts. Operation of the project would generate noise from sources such as medical office uses—including an increase in associated traffic—and heating, ventilation, and air conditioning equipment. The project would not house emergency medical services and would not receive visits from vehicles using emergency sirens or medical helicopters. As a medical office building, the project would not include truck activity or loud machinery beyond that expected for a normal office building. The building would be built to follow standard specifications for noise shielding, and the project would not be expected to substantially increase noise levels beyond the project site. With no long-term care facilities, the project is not considered a noise-sensitive use. The project will be required to adhere to City's Noise Ordinance regulations.

The project would contribute traffic to highways and roadways in the vicinity, generating an average of 2,088 daily trips. On high-volume roadways with noise volumes at levels above 60 decibels near sensitive uses, such as Corporate Center Parkway and Highway 12, the traffic increase from the project would be less than a doubling of existing traffic volumes. This increase in new trips would not cause a substantial permanent increase in ambient noise levels in the project vicinity.

Consistent with the General Plan EIR, the project's impact related to noise and vibration would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

XIII (c): No Impact. The project site in not within the Airport Influence Area of the Charles M. Schulz—Sonoma County Airport approximately 6 miles to the north. There are no other airports, either public or private, within the vicinity of the project site. Implementation of the project would have **no impact** related to airport noise. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

Standard Measures:

- Standard City conditions of project approval limit the hours of construction to 7 a.m. to 7 p.m. Monday through Friday and 8 a.m. to 6 p.m. Saturdays. No construction is permitted on Sundays and holidays.
- At the building permit stage, the project plans shall demonstrate conformance with the City's standard for interior noise levels.
- Prior to construction, during the design phase of the building, an acoustical study will be required to demonstrate to the City's building official that noise emissions from stationary equipment on the new building would conform to the City's requirements. Completion of this study would be required prior to issuance of a building permit.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to noise that were not identified therein. The Program EIR did not identify any mitigation measures related to noise that would apply to the project, and none would be needed.

XIV. POPULATION AND HOUSING

		Proposed Project			
	General Plan EIR Findings with	Relationship to General Plan EIR Findings			
Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
a) Induce substantial unplan population growth in an ar- either directly (for exampl by proposing new homes a businesses) or indirectly (f example, through extension of roads or other infrastructure)?	rea, e, nd LTS or	•		None	LTS
b) Displace substantial number of existing people or housing necessitating the construct of replacement housing elsewhere?	ng,	•		None	NI

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to population growth and housing.

PROJECT IMPACT DISCUSSION

XIV (a): Less than Significant. A project could be considered growth inducing if it were to provide new housing, new employment, or expand existing infrastructure not planned for by a local plan. The project would develop a new 57,579-square-foot community-based outpatient clinic with 200 full-time equivalent employees and an anticipated 1,500 daily visits. A large number of the project's employees will relocate form the existing VA facilities in Santa Rosa, to this new facility. The project would not be expected to induce substantial unplanned population growth or growth that exceeds the buildout projections in the General Plan.

Consistent with the General Plan EIR, the project's impact on population growth would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

XIV (b-c): No Impact. The project site does not contain existing housing. The project would not displace existing housing or people, would not require construction of replacement housing elsewhere, and would not contribute to related impacts identified in the General Plan EIR. No impact would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to population and housing that were not identified therein. The Program EIR did not identify any mitigation measures related to population and housing that would apply to the project, and none would be needed.

XV. PUBLIC SERVICES

		Proposed Project				
	General Plan EIR Findings with Implementation of	Genera	ionship to al Plan EIR ndings			
Impact Topics	Mitigation Measures (if required)	Equal or Less Severity	Less Increase in		Level of Significance	
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:						
a) Fire protection?	LTS	_		None; Implement	LTS	
	ПΙ	-	Ц	Standard Measures	ПВ	
b) Police protection?	LTS			None	LTS	
c) Schools?	LTS			None	LTS	
d) Parks?	LTS			None	LTS	

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to increased demand for police and fire protection services and facilities, school facilities, and parks.

The General Plan calls for the addition of a new fire station in the southeastern area of Santa Rosa and the relocation of the existing Fire Station 8 (located approximately 0.9 mile to the east of the project site at 830 Burbank Avenue) to a more easterly area based on an analysis of emergency response times. ¹⁴ Fire Station 10 is located approximately 0.25 mile to the south of the project site. The Police Department operates out of the public safety building at 965 Sonoma Avenue. Police response times average 5 minutes 51 seconds for Priority One calls, which is acceptable under the General Plan.

PROJECT IMPACT DISCUSSION

XV (a-e): Less than Significant. The project site is located within the City of Santa Rosa and would receive all necessary public services. Development of the proposed project would not increase the demand for public services to the extent that new governmental facilities would be required to maintain acceptable service ratios, response times, or other performance objectives. Additionally, because the project is consistent

City of Santa Rosa, Planning and Economic Development. Annual Review 2018, General Plan 2035, Growth Management Ordinance, & Housing Allocation Plan Ordinance, City Council & Planning Commission Report. Available at: https://srcity.org/DocumentCenter/View/24331/General-Plan-Annual-Review-Report-2018

with the General Plan, it would not induce substantial population growth or employment beyond that considered in the General Plan.

Consistent with the General Plan EIR, the project's impact on public services would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

Standard Measures:

- The Fire Department has reviewed plans for the proposed project and imposed standard conditions of approval.
- Other standard conditions of approval will apply, including provision of a fire flow analysis to ensure adequate water pressure and flow rates.
- Street trees will be required and planted by the developer. Selection will be made by the city's approved master plan list and approved by the city's Parks Division. Planting shall be done in accordance with the city "Standards and Specifications for Planting Parkway Trees." Tree planting locations will be marked by the city Parks Division Tree Section personnel.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to public services that were not identified therein. The Program EIR did not identify any mitigation measures related to public services that would apply to the project, and none would be needed.

XVI. RECREATION

		Proposed Project			
	General Plan EIR Findings with	Relationship to General Plan EIR Findings			
Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	N/A			N/A	NI
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	N/A			N/A	NI

GENERAL PLAN EIR FINDINGS

Impacts on recreation facilities were not expressly addressed in the General Plan EIR.

PROJECT IMPACT DISCUSSION

XVI (a-b): No Impact. The development of the project would not result in an increased demand for recreational facilities because no housing is proposed. The project does not include construction of recreational facilities or require the expansion of recreational facilities. Therefore, the project would have no impact on recreation facilities or the physical environment from construction or expansion of recreational facilities.

No impact would occur. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

CONCLUSIONS

Based on an examination of the analysis, implementation of the project would not result in a significant impact on recreation facilities. The project would not result in significant on-site, off-site, or cumulative effects on recreation facilities, even though these effects were not fully addressed in the Program EIR.

XVII. TRANSPORTATION

			Proposed Project				
		General Plan EIR Findings with		hip to General IR Findings			
	Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance	
a)	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	LTS	•		None	LTS	
b)	Conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)?	SU	•		None	LTS	
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	LTS	•		None	LTS	
d)	Result in inadequate emergency access?	LTS	•		None	LTS	

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to transit, bicycle, and pedestrian facilities as well as potential safety conflicts. These impacts are reduced through implementation of policies intended to promote alternative transportation options and use and through implementation of modern roadway construction design standards for safety and emergency access.

The General Plan EIR identified impacts as significant and unavoidable impact related to increases in traffic and degradation of intersection operation with unknown funding and timing of improvements that would mitigate those impacts.

PROJECT IMPACT DISCUSSION

XVI. a-b) Less than Significant. A Traffic Impact Study was completed for the project and is included as **Appendix E** to this document. ¹⁵

The project is estimated to generate an average of 2,088 daily trips, including 167 a.m. peak hour trips and 208 p.m. peak hour trips. The Traffic Impact Study determined that study intersections would continue to operate at acceptable levels with the addition of project traffic. Considering future cumulative growth under the General Plan, the project would not contribute significantly to any intersections operating at deficient levels or significantly degrade any study intersections operating at acceptable levels.

W-Trans, Traffic Impact Study for the VA Medical Office Building Project, May 2020.

Existing transit facilities serving the project site include Santa Rosa CityBus Route 9 and by Sonoma County Transit Route 22. Existing bicycle facilities include Class II bicycle lanes on Corporate Center Parkway, as well as bike lanes on Sebastopol Road and Northpoint Parkway. There are no existing pedestrian facilities on the project site. The proposed project would include sidewalks along roadway frontages with connections to the building. The Traffic Impact Study concluded that transit, bicycle, and pedestrian facilities serving the project site are adequate.

The Traffic Impact Study also considered whether the project would result in an increase in vehicle miles traveled (VMT) of more than 15 percent over the County of Sonoma baseline VMT average. As shown in Table 2, the average daily employment VMT per capita in transportation analysis zone (TAZ) 490 (the TAZ in which the project site is located) is 6.95, which is below the citywide average minus 15%.

TABLE 2: DAILY VEHICLE MILES TRAVELED PER WORKER

City of Santa Rosa	City of Santa Rosa	Transportation	Proposed Project
Average	Average minus 15%	Analysis Zone 490	
9.41	8.0	6.96	5.06

Source: W-Trans, Traffic Impact Study for the VA Medical Office Building Project (available as Appendix D).

The anticipated VMT for the project would be more than 15% below the citywide average; therefore, the project is not expected to have a significant impact related to VMT.

Consistent with the General Plan EIR, the project's impact on the circulation system and alternative modes of transportation would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

XVI. c-d) Less than Significant: The proposed project would include construction of four new access driveways—one from Challenger Way and three from Apollo Way. The driveway on Challenger Way and northernmost driveway on Apollo Way would provide full ingress and egress access for visitors and employees. The remaining two Apollo Way driveways would be one-way and limited to use by police, security, and ambulances. The Traffic Impact Study prepared for the project determined that sight lines at the proposed driveways on Challenger Way and Apollo Way are adequate.

Construction and operation of the project would not affect streets or otherwise affect emergency access routes. The Traffic Impact Study determined that on-site circulation for ambulance vans is adequate, and that fire trucks would park on Challenger Way and Apollo Way to access the fire hydrants and would not need to enter the site. The project would also be required comply with all Santa Rosa Fire Department standards to ensure adequate emergency access and that the project design would not result in hazards on the site or in its immediate surroundings.

Consistent with the General Plan EIR, the project's impact on safety and access would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to transportation that were not identified therein. The Program EIR did not identify any mitigation measures related to transportation that would apply to the project, and none would be needed.

XVIII. TRIBAL CULTURAL RESOURCES

			Proposed Project			
		General Plan EIR Findings with Implementation of	General Plan EIR Findings Equal or Substantial Applicable Less Increase in Mitigation Level			
	Impact Topics	Mitigation Measures (if required)			Level of Significance	
cha tril Pu 210 pla geo the lan wit	use a substantial adverse ange in the significance of a pal cultural resource, defined in blic Resources Code section 174 as either a site, feature, ce, cultural landscape that is ographically defined in terms of a size and scope of the dscape, sacred place, or object the cultural value to a California tive American tribe, and that Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall	LTS			None; Implement Standard Measures None; Implement Standard Measures	LTS
	consider the significance of the resource to a California Native American tribe.					

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant related to tribal cultural resources.

PROJECT IMPACT DISCUSSION

XVII (a): Less than Significant. The project site is previously disturbed and there are no known tribal cultural resources at the site. A search of the Native American Heritage Commission Sacred Lands File, however, had positive results for the project site. ¹⁶ Pursuant to AB 52, the City conducted outreach to area

If a Sacred Lands Inventory search reveals that a Native American cultural resource is in a project area, the NAHC provides a list of the California Native American Tribes that are traditionally and culturally affiliated to the project

Native American Tribes on October 30, 2018, and again on January 29, 2020. The condition of approval requiring an archaeological study prior to grading was cited in the January 29 letters. To date, no requests for consultation have been received from the tribes, and no tribal concerns or tribal cultural resources have been identified.

Given the previously disturbed nature of the project site, minimal amount of disturbance of native soils during construction, and the lack of Native American Tribes response to AB 52 outreach, it can be concluded that the project would not have the potential to significantly affect any Sacred Lands in the vicinity of the project site. However, because cultural resources were identified within a 0.5-mile radius of the project site during the NWIC search, with one archeological site located approximately 2,120 feet from the project site, implementation of standard measures related to cultural resources will be required. The project will also be required to comply with any recommendations provided in the Phase I archaeological survey report.

Consistent with the General Plan EIR, the project's impact on tribal cultural resources would be **less than significant**. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

Standard Measures:

- Prior to demolition or other ground disturbance, a qualified professional archaeologist shall conduct a Phase I survey of the site consisting of further archival and field study to identify archaeological resources and including a good faith effort to identify archaeological deposits that may show no indications on the surface. In the event archaeological resources or human remains are discovered on-site, these resources would be handled according to applicable regulations (Public Resources Code Sections 21083.2, 21084.1, 5097.98, 15064.5(d) and/or Section 7050.5 of the Health and Safety Code).
- If cultural resources are discovered during the project construction (inadvertent discoveries), all work in the area of the find shall cease and a qualified archaeologist and representatives of the appropriate tribe shall be retained by the project sponsor to investigate the find and make recommendations as to treatment and mitigation of any impacts to those resources.
- If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin. Further, pursuant to California Public Resources Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Sonoma County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within a reasonable timeframe. Subsequently, the Native American Heritage Commission shall identify the "most likely descendant." The most likely descendant shall then make recommendations, and engage in consultations concerning the treatment of the remains as provided in Public Resources Code 5097.98.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to tribal cultural resources that were not identified therein. The Program EIR did not identify any mitigation measures related to tribal cultural resources that would apply to the project, and none would be needed.

area so that the CEQA lead agency may consult with the Tribes to discuss avoidance, preservation in place, or mitigation of impacts to any Native American cultural resources in a project area.

XIX. UTILITIES AND SERVICE SYSTEMS

			Proposed Project				
		General Plan EIR Findings with	Relationship to General Plan EIR Findings				
	Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance	
a)	Require or result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	LTS	•		None	LTS	
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	LTS	•		None	LTS	
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	LTS	•		None	LTS	
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	LTS	•		None	LTS	
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	LTS	•		None	LTS	

GENERAL PLAN EIR FINDINGS

The General Plan EIR identified impacts as less than significant for wastewater capacity, water demand, and solid waste generation. The wastewater system rated capacity is expected to provide sufficient capacity into the future ¹⁷ and water supply is expected to meet projected demand of the General Plan buildout. ¹⁸ Solid

City of Santa Rosa, Planning and Economic Development. Annual Review 2018, General Plan 2035, Growth Management Ordinance, & Housing Allocation Plan Ordinance, City Council & Planning Commission Report. Available at: https://srcity.org/DocumentCenter/View/24331/General-Plan-Annual-Review-Report-2018

waste generation associated with General Plan buildout is expected to be addressed through waste reduction efforts, including recycling and composting.

PROJECT IMPACT DISCUSSION

XVII (a-e): Less than Significant. The project involves construction of a new medical office building on an undeveloped site in the Northpoint Corporate Center area, and the project site would be served by all utilities. Construction of the project would increase the development and number of employees and visitors on-site. This increase, however, would not be substantial and would not require or result in the relocation or construction of new or expanded utilities and service systems.

The project's contribution to wastewater flows was anticipated in the General Plan, and the increase in wastewater is well within the flow capacity. The proposed project would not generate wastewater that exceeds the capacity of the City's existing wastewater treatment plant, when added to existing and projected commitments through General Plan buildout.

The project would not generate substantial water demands beyond what has been anticipated in the General Plan. The existing entitlements for water supplies are sufficient to continue to meet the needs of Santa Rosa in addition to the increased water demands generated by the project. Water demand onsite would be limited through efficient irrigation of the landscaping and water efficient fixtures, and building standards consistent with requirements established by the City's Water Efficient Landscape Ordinance and the CALGreen Building Code.

Although the waste stream generated by the project is expected to increase during construction it is not expected to exceed landfill capacity and is not expected to result in violations of federal, state, and local statutes and regulations related to solid waste. The project applicant is required to adhere to all regulations governing the disposal of solid waste. Construction related waste would be reduced through the development of a construction waste management plan and as required by applicable CALGreen Building Code standards.

Consistent with the General Plan EIR, the project's impact on utilities and service systems would be **less** than significant. Impacts related to development of the project would therefore be within the scope of the General Plan EIR.

CONCLUSIONS

Based on an examination of the analysis, findings, and conclusions of the Program EIR, implementation of the project would not substantially increase the severity of the significant impacts identified in the Program EIR, nor would it result in new significant impacts related to utilities and service systems that were not identified therein. The Program EIR did not identify any mitigation measures related to utilities and service systems that would apply to the project and none would be needed.

City of Santa Rosa, Utilities Department. SB610 Water Supply Assessment for Santa Rosa General Plan 2035. November 2008. Available at: https://srcity.org/DocumentCenter/View/3097/Draft-General-Plan-Environmental-Impact-Report-Water-Supply Assessment-PDF

XX. WILDFIRE

		Proposed Project				
	General Plan EIR Findings with	Relationship to General Plan EIR Findings				
Impact Topics	Implementation of Mitigation Measures (if required)	Equal or Less Severity	Substantial Increase in Severity	Applicable Mitigation Measures	Level of Significance	
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:						
 a) Substantially impair an adopted emergency response plan or emergency evacuation plan? 	N/A			N/A	NI	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	N/A			N/A	NI	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	N/A			N/A	NI	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	N/A			N/A	NI	

GENERAL PLAN EIR FINDINGS

Wildfire hazards for projects located in or near state responsibility areas or lands classified as very high fire hazard severity zones were not expressly addressed in the General Plan EIR. The CEQA Guidelines were recently updated to include this topic, which is analyzed below.

PROJECT IMPACT DISCUSSION

XX (a-d): No Impact. The project site, which is located within an urbanized area of the City of Santa Rosa, has not been identified as within and is not located near a Very High Fire Hazard Severity Zone. The project site falls within a Local Responsibility Area and is under the jurisdiction of the Santa Rosa Fire

Department.¹⁹ The proposed project would have **no impact** related to wildfire risk and emergency response for lands in or near state responsibility areas or classified as very high fire hazard severity zones.

CONCLUSIONS

Based on an examination of the analysis, implementation of the project would not result in a significant impact related to wildfire for projects located in or near state responsibility areas or lands classified as very high fire hazard severity zones. The project would not result in significant on-site, off-site, or cumulative effects related to wildfire, even though these effects were not fully addressed in the Program EIR.

California Department of Forestry and Fire Protection. Fire Hazard Severity Zones Maps. Website accessed 1.15.20 at https://osfm.fire.ca.gov/media/6005/santa_rosa.pdf

XI. MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a)	Does the project have the potential to substantially degrade the quality of the environ-ment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			•	
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			-	
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			•	

PROJECT IMPACT DISCUSSION

XI (a-c): Less than Significant. With the implementation of the standard measures identified in this document, the project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community. Nor would the project have an impact on rare or endangered wildlife species or eliminate important examples of the major periods of California history or prehistory.

The project would not result in adverse impacts that are individually limited but cumulatively considerable, including effects for which project-level measures were identified to reduce impacts to less than significant levels. Potential effects would be less than significant with implementation of standard measures identified in this document and would not contribute in considerable levels to cumulative impacts.

The project would not have substantial adverse effects on human beings, either directly or indirectly, including effects for which project-level measures were identified to reduce impacts to less than significant levels.

SOURCE REFERENCES

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

California Department of Forestry and Fire Protection. Fire Hazard Severity Zones Maps. Website accessed 1.15.20 at https://osfm.fire.ca.gov/media/6005/santa_rosa.pdf
City of Santa Rosa, Santa Rosa General Plan 2035. November 2009. Available at: https://srcity.org/392/General-Plan.
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Utilities Department, SB610 Water Supply Assessment for Santa Rosa General Plan 2035. November 2008. Available at: https://srcity.org/DocumentCenter/View/3097/Draft-General-Plan-Environmental Impact-Report-Water-Supply Assessment-PDF
U.S. Fish and Wildlife Service, Sacramento Field Office, Santa Rosa Conservation Strategy, Figure 3, Santa Rosa Plain Conservation Strategy Map, available at: https://www.fws.gov/sacramento/es/Recovery-Planning/Santa-Rosa/santa-rosa-strategy.php.

ACRONYMS AND TERMS

ABAG Association of Bay Area Governments

BAAQMD Bay Area Air Quality Management District

BMP best management practices

BP Business Park

CAP Climate Action Plan

CBC California Building Code

CEQA California Environmental Quality Act

City of Santa Rosa

EIR Environmental Impact Report

GHG greenhouse gas
LTS less than significant
MM mitigation measure

MTCO₂e metric tons of carbon dioxide equivalent

NI no impact

NPDES National Pollution Discharge Elimination System

NWIC Northwest Information Center PDA Priority Development Area

PM particulate matter

 $PM_{2.5}$ particulate matter, 2.5 micrometers or less PM_{10} particulate matter, 10 micrometers or less RWQCB Regional Water Quality Control Board

SWLIDS Storm Water Low Impact Development Submittal

SRPCS Santa Rosa Plain Conservation Strategy
SWPPP Stormwater Pollution Prevention Plan

TAC toxic air contaminant

VA U.S. Department of Veterans Affairs