Attachment 2

Responses to Comments

Roseland Creek Community Park Master Plan

Draft Environmental Impact Report

SCH No. 2022080148

Prepared by

City of Santa Rosa

In Consultation with

DAVID J. POWERS & ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS & PLANNERS

September 2024

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SECTION 1.0 INTRODUCTION

This Responses to Comments document, together with the Draft Environmental Impact Report (Draft EIR) and the Mitigation Monitoring and Reporting Program (MMRP), constitute the Final Environmental Impact Report (Final EIR) for the Roseland Creek Community Park Master Plan project.

1.1 PURPOSE OF THE FINAL EIR

In conformance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, this Final EIR provides objective information regarding the environmental consequences of the proposed project. The Final EIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The Final EIR is intended to be used by the City and any Responsible Agencies in making decisions regarding the project.

Pursuant to CEQA Guidelines Section 15090(a), prior to approving a project, the lead agency shall certify that:

(1) The Final EIR has been completed in compliance with CEQA;
(2) The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project; and
(3) The Final EIR reflects the lead agency's independent judgment and analysis.

1.2 CONTENTS OF THE FINAL EIR

CEQA Guidelines Section 15132 specify that the Final EIR shall consist of:

a) The Draft EIR or a revision of the Draft;
b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
d) The Lead Agency's responses to significant environmental points raised in the review and consultation process; and
e) Any other information added by the Lead Agency.

1.3 PUBLIC REVIEW

In accordance with CEQA and the CEQA Guidelines (Public Resources Code Section 21092.5[a] and CEQA Guidelines Section 15088[b]), the City is required to provide written responses to comments submitted on the Draft EIR by other public agencies at least 10 days prior to certifying the EIR. The Responses to Comments and all documents which comprise the Final EIR are available for public review at the following two locations on weekdays during normal business hours:

- Recreation and Parks Department – 55 Stony Point Road, Santa Rosa, CA 95401
- Finley Community Center – 2060 College Avenue, Santa Rosa, CA 95401

The Final EIR documents are also available for review on the City's website:
https://www.srcity.org/3663/Roseland-Creek-Community-Park

SECTION 2.0 DRAFT EIR PUBLIC REVIEW SUMMARY

The Draft EIR for the Roseland Creek Community Park Master Plan project, dated April 2024, was circulated to affected public agencies and interested parties for a 53-day review period from April 25, 2024, through June 17, 2024. The City undertook the following actions to inform the public of the availability of the Draft EIR:

- A Notice of Availability of the Draft EIR was published on the City's website (https://www.srcity.org/3663/Roseland-Creek-Community-Park) and in the Santa Rosa Press Democrat;
- Signage on the project site provided notice of the availability of the Draft EIR in both English and Spanish;
- Notification of the availability of the Draft EIR was mailed to project-area residents and other members of the public who had indicated interest in the project;
- Notification of the availability of the Draft EIR was emailed to the Lytton Rancheria of California, the Federated Indians of Graton Rancheria, and a list of previous meeting attendees;
- The Draft EIR was delivered to the State Clearinghouse on April 25, 2024, as well as sent to various governmental agencies, organizations, businesses, and individuals (see Section 3.0 for a list of agencies, organizations, businesses, and individuals that received the Draft EIR); and
- Copies of the Draft EIR were made available on the City's website (https://www.srcity.org/3663/Roseland-Creek-Community-Park), and notification of the Draft EIR review period was provided in the City Connections newsletter (https://www.srcity.org/3286/City-Connections-Newsletter) April 25, May 9, and May 30, 2024.

SECTION 3.0 DRAFT EIR RECIPIENTS

CEQA Guidelines Section 15086 requires that a local lead agency consult with and request comments on the Draft EIR prepared for a project of this type from responsible agencies (government agencies that must approve or permit some aspect of the project), trustee agencies for resources affected by the project, adjacent cities and counties, and transportation planning agencies.

The NOA for the Draft EIR was sent to owners and occupants adjacent to the project site and within the surrounding area. The following agencies received a copy of the Draft EIR from the City or via the State Clearinghouse:

- California Air Resources Board (ARB)
- California Department of Forestry and Fire Protection (CAL FIRE)
- California Department of Parks and Recreation
- California Department of Toxic Substances Control (DTSC)
- California Department of Transportation, District 4 (DOT)
- California Department of Water Resources (DWR)
- California Highway Patrol (CHP)
- California Native American Heritage Commission (NAHC)
- California Natural Resources Agency
- California Public Utilities Commission (CPUC)
- California Regional Water Quality Control Board, North Coast Region 1 (RWQCB)
- Office of Historic Preservation
- State Water Resources Control Board
- Division of Drinking Water
- California Department of Fish and Wildlife, Bay Delta Region 3 (CDFW)

SECTION 4.0 RESPONSES TO DRAFT EIR COMMENTS

In accordance with CEQA Guidelines Section 15088, this document includes written responses to comments received by the City of Santa Rosa on the Draft EIR.

Comments are organized under headings containing the source of the letter and its date. The specific comments from each of the letters and/or emails are presented with each response to that specific comment directly following. Copies of the letters and emails received by the City of Santa Rosa are included in their entirety in Appendix A of this document. Comments received on the Draft EIR are listed below.

Comment Letter and Commenter **Page of Response**

4.1 FEDERAL AND STATE AGENCIES

A. California Department of Fish and Wildlife (dated June 10, 2024)

Comment A.1: The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an Environmental Impact Report (EIR) from the City of Santa Rosa (City) for the Roseland Creek Community Park Master Plan (project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines. CDFW previously submitted a letter dated September 7, 2022 in response to the EIR Notice to Preparation (NOP) for the project.

CDFW is submitting comments on the EIR to inform the City, as the Lead Agency, of our concerns regarding potentially significant impacts to biological resources associated with the project.

CDFW ROLE

CDFW is a Trustee Agency with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), Lake and Streambed Alteration (LSA) Program, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Santa Rosa

Objective: The project proposes to construct a new community park to serve the Roseland neighborhood. Trails, interpretive signs, and upland habitat restoration in existing grasslands are proposed for the northern section of the park. The central portion of the project site contains the oak (Quercus sp.) woodland habitat, which would be left intact and would also contain trails and interpretive signs. A nature center and restroom building would be constructed near the parking lot on the west side of the park, north of Roseland Creek. A picnic area and outdoor classroom or community garden would be located along the northern side of the riparian corridor along Roseland Creek at the edge of the oak woodland. On the south side of the riparian corridor, there would be a restroom near the parking lot, picnic areas (including single-use BBQs), a nature-themed play area, a lawn area, and sports court. A trail surrounding the lawn and play areas would include fitness stations. The existing purple needlegrass (Stipa pulchra) grassland area near the southeast corner of the site would be preserved, with trails encircling it. The site currently consists of primarily undeveloped land. Habitat on-site consists of annual grasslands, oak and riparian woodlands, and Roseland Creek.

Location: The 19.49-acre project site is located at 1027 McMinn Avenue, and 1360, 1370 and 1400 Burbank Avenue (Assessor's Parcel Numbers 125-331-001, 125-252-003, 125-252-002, and 125-252-004) in the City of Santa Rosa and in Section 27, Township 7 North, Range 8 West of the Mount Diablo Meridian U.S. Geological Survey 7.5' quadrangle map, at approximately Latitude 38.423440°N, Longitude 122.733154°W.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the project. As indicated in CDFW's NOP response letter and further described below, the project has the potential to result in take of California tiger salamander (*Ambystoma californiense*), which is CESA listed as threatened species, and Sonoma sunshine (*Blennosperma bakeri*), Sebastopol meadowfoam (*Limanthes vinculans*), and Burke's goldfields (*Lasthenia burkei*), which are CESA listed as endangered species. Issuance of a CESA ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the project will impact CESA listed species, early consultation is encouraged, as significant modification to the project and mitigation measures may be required in order to obtain a CESA ITP.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the project proponent's obligation to comply with CESA.

Lake and Streambed Alteration

An LSA Notification, pursuant to Fish and Game Code section 1600 et seq., is required for project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW will consider the CEQA document for the project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement (or ITP) until it has complied with CEQA as a Responsible Agency. Thank you for including the requirement of an LSA Agreement as a mitigation measure in the EIR.

> **Response A.1:** The CDFW's role as Trustee and Responsible Agency is acknowledged along with the associated permit authority for habitats and special-status species. Responses to CDFW's specific comments and recommendations are provided below.

Comment A.2: COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Attachment 1 includes a Draft Mitigation Monitoring and Reporting Program for CDFW's recommended mitigation measures.

I. Mandatory Findings of Significance: Does the project have the potential to substantially reduce the number or restrict the range of a rare or endangered plant or animal?

COMMENT 1: Page 42-43, Environmental Setting and Related Impact Shortcoming

Issue: The EIR indicates that wetlands are present within the project site. Wetlands in the Santa Rosa Plain may support Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields. Sebastopol meadowfoam has been documented one mile southwest of the project site (California Natural Diversity Database [CNDDB] Occurrence Number 1).

As noted in CDFW's NOP response letter, the Santa Rosa Plain Conservation Strategy, Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain (https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy) and CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) provide guidelines for acceptable survey documentation for protocol-level surveys for CESA and federally listed plants on the Santa Rosa Plain. According to the EIR, protocol-level surveys were conducted in March, April, and May 2018, and one follow-up site visit in May 2022, with negative results. However, the above Santa Rosa Plain Conservation Strategy (Strategy) protocols require two years of surveys with a minimum of three visits during the growing season per year to be considered valid. Only one site visit was made during 2022, therefore this survey may not be considered valid. In addition, survey reports were not included with the EIR so it is unclear if all elements of the survey were completed in conformance with the above protocols.

Specific impacts and why they may occur and be significant: Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields are CESA and federally listed as endangered species. These species may be directly or indirectly impacted by the project, and due to inadequate surveys, they may be present on-site but remain undetected resulting in mortality of individuals or indirect impacts from degradation of habitat adjacent to ground disturbance due to altering hydrological conditions or other factors. Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields are considered endangered under CEQA pursuant to CEQA Guidelines section 15380. Therefore, if these species are present on or adjacent to the project site where they would be directly or indirectly impacted, the project may substantially reduce the number or restrict the range of these species, which would be a mandatory finding of significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommended Mitigation Measure: For an adequate environmental setting, to comply with CESA and the federal Endangered Species Act (ESA), and to reduce impacts to Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields to less-than-significant, CDFW recommends including the following mitigation measure in the EIR.

MM-BIO-1. The project shall submit to CDFW two years of completed botanical survey results and obtain CDFW's written approval of the results prior to project construction. The botanical survey results shall follow CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and the Santa Rosa Plain Conservation Strategy, Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the

Santa Rosa Plain (https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy). If CDFW is unable to accept the survey results, the project shall conduct additional surveys prior to initiation of project activities or may assume presence of Sonoma sunshine, Burke's goldfields, and Sebastopol meadowfoam. Please be advised that for CDFW to accept the results, they should be completed in conformance with CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and the Santa Rosa Plain Conservation Strategy, Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain (https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy), including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys conducted during drought conditions may not be acceptable. If the botanical surveys result in the detection of the above CESA listed plants that may be impacted by the project, or the presence of these species is assumed, the project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP. In addition, the project shall consult with the U.S. Fish and Wildlife Service (USFWS) for any impacts to suitable habitat for plants listed under the federal ESA.

Response A.2: The City acknowledges that the protocol for surveying listed plant species covered by the Santa Rosa Plain Conservation Strategy (USFWS 2005) includes two years of surveys during the bloom periods of all three Santa Rosa Plain listed plant species, Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields, i.e. March, April and May. Per the Santa Rosa Plain Conservation Strategy, these listed plants only grow in seasonal wetlands.

As described in the EIR and noted in the comment above, WRA conducted one full year of protocol-level surveys for the aforementioned species with negative results for listed plants in 2018 and conducted one follow-up rare plant survey in May 2022. The 2018 surveys coincided with the documented bloom periods of the Santa Rosa Plain listed plant species and all other special-status plant species documented in the Project Area vicinity with potential to occur in the Project Area. WRA did not complete a second full year of protocol-level surveys for Santa Rosa Plain listed plants for the following reasons:

1. The wetland identified within the Project Area will not be impacted and will be completely avoided by project improvements. No permanent or temporary, direct or indirect wetland impacts are anticipated to occur; and
2. The wetland within the Project Area is a streamside wetland that does not provide vernal pool and swale habitat typically associated with the Santa Rosa Plain listed plant species.

To elaborate, the wetland identified within the Project Area is functionally a streamside wetland which is located in a backflow channel that floods intermittently during the rainy season. The wetland is located below the ordinary high-water mark (OHWM), is dominated by perennial wetland species, water-plantain (*Alisma triviale*), and is heavily shaded by a mature riparian tree canopy. Therefore, this does not provide the typical suitable habitat where these vernal pool and swale associated

species are typically known to occur. Moreover, the protocol-level surveys for the Santa Rosa Plain listed plant species were conducted prior to the Project Description being finalized. Following the first year of protocol-level surveys the Project Description was finalized and it was apparent that the wetland would be completely avoided which it was assumed would preclude the need for a second year of protocol-level surveys for the listed plant species that only grow in seasonal wetlands since no potential impacts to wetland habitat would be occurring.

Comment A.3: COMMENT 2: Page 44-45, Environmental Setting, Mitigation Measure, and Related Impact Shortcoming

Issue: The EIR states that California tiger salamander are unlikely to occur in the annual grasslands and oak woodlands within the project limits. However, several other projects in the immediate vicinity of the project site obtained ITPs for California tiger salamander as described in CDFW's NOP response letter. In addition, three occurrences of California tiger salamander have been documented within 0.75 mile of the project (CNDDB Occurrence Numbers 11, 62, and 72) and California tiger salamander dispersal to the project site may be possible through the surrounding low-density development.

In addition, the EIR includes MM-BIOc.1-1, which states, "*Prior to the commencement of ground disturbing activities, the site shall be inspected for burrows or other refugia that could support CTS. If none are detected, work can proceed without further measures. If burrows or other refugia with potential to support CTS are detected and cannot be avoided, the project shall consult with CDFW to determine if any additional measures, including an incidental take permit, may be required*." The project description is unlikely to feasibly avoid burrows and other upland refugia, especially south of Roseland Creek. In addition, any California tiger salamander may be effectively isolated from breeding and upland habitat by construction of the project, resulting in impacts to the species. Additionally, regardless of the current presence of California tiger salamander, the project would still result in permanent loss and likely temporary loss of suitable California tiger salamander habitat, further degrading any potential recovery of this threatened and imperiled species.

Specific impacts and why they may occur and be significant: California tiger salamander may be directly or indirectly impacted by the project resulting in mortality of individuals from direct impacts or indirect impacts from degradation of habitat adjacent to ground disturbance and other factors. Additionally, the project would result in the permanent and likely temporary loss of California tiger salamander habitat. California tiger salamander are considered threatened under CEQA pursuant to CEQA Guidelines section 15380. Therefore, if California tiger salamander are present on or adjacent to the project site where they may be directly or indirectly impacted, or habitat loss occurs, the project may substantially reduce the number or restrict the range of these species, which would be a mandatory finding of significance pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommended Mitigation Measure: For an adequate environmental setting and to reduce impacts to California tiger salamander to less-than-significant and to comply with CESA and federal ESA, CDFW recommends including the following mitigation measure in the EIR.

MM BIO-2. Prior to commencing project construction, the project shall obtain a CESA ITP from CDFW for impacts to California tiger salamander and comply with the ITP. The project shall also

obtain authorization from the USFWS for impacts to California tiger salamander and comply with the authorization. The project shall provide habitat compensation for California tiger salamander in accordance with the Strategy, CESA ITP, and USFWS authorization. Please note that the CESA ITP habitat compensation requirements are often consistent with the Strategy but may differ based on current information and site-specific conditions. CDFW staff are available to assist with the ITP process.

Response A.3: The City acknowledges CDFW's comment and recommendations. However, the City has substantial evidence to support the finding that CTS is unlikely to occur on the site, as described in the Project's biological study and provides further analysis to support that conclusion in this response. The absence of burrows on the site, documented over the course of multiple years, makes it unlikely that CTS would find ample refuge to persist on the site. Because these are not present, it is unlikely that undetected CTS would be affected by implementation of the project, which involves shallow soil disturbance and is of limited extent. If gophers do colonize the site, burrows can be avoided through implementation of preconstruction surveys (see MM BIO-1c.1) followed either by modification of the project footprint to avoid detected burrows or, if burrows or other refugia cannot be avoided, the project would seek additional consultation with relevant agencies as described in the measure. This same approach is applicable to expansion cracks or other potential refugia, which are rare on the site.

The City's evaluation of the potential impacts of the project did not consider the issue of ITPs for nearby projects because the site itself was evaluated. There is no statutory requirement for the City to consider a neighboring project's acquisition of an ITP or decision not to do so because the determination of likelihood of occurrence is based on existing conditions on the subject parcel and consideration of immediately adjacent site conditions as they relate to the life history of the species being evaluated. In addition, the nature of the project should be considered with respect to how the project could affect the species and/or its habitat. The nature of this project is for installation of trails, two parking lots, and some small structures. None of the proposed improvements would substantially alter the ability of CTS to migrate through the site, if they were to be present on nearby properties with suitable breeding habitat, which is absent on the subject property. CDFW has not provided evidence to contradict this conclusion.

CTS and their breeding habitat with connectivity to the site is rare in this part of Santa Rosa and has become more so since 2020. The three nearest occurrences that the CDFW references in its comment letter support this conclusion. Occurrence number 72 is from 2003 and is for a single female detected on a road (and was found less than .5 miles from occurrence 11, in an area with reasonably good connectivity to it). Occurrence number 62 is from as recent as 2003 and included a breeding site, which has since been developed over and occurrence number 11 is for Southwest Community Park, which is likely extirpated, given the CNDDB detail for the site, which reads "LARVAE AND ADULTS OBSERVED MANY TIMES, INCLUDING IN 1995, 1997, 1999, 2000, 2001, 2002, 2004, 2005, 2006, 2007, 2008, 2009 & 2010.

NONE FOUND DURING A NUMBER OF SURVEYS BETWEEN 2011 AND 2017."

The Stony Oaks housing development was installed over the nearest historic breeding site for CTS and other developments have been installed between 2020 and the present, notably including the Schellinger subdivision housing development two parcels south of the southern border of the subject parcel.

CDFW and USFWS guidance (CDFG 2003)[1] on site assessment and field surveys for determining presence or a negative finding for CTS states that: "Because CTS have been observed to make breeding migrations of at least 0.6 miles (1 km), the project proponent or the Service may assume presence of CTS if a known breeding pond lies within 1 km **and no significant barriers exist. Examples of significant physical barriers include high-density residential or urban development** and Interstate Highways, while features such as golf courses, disked fields, and most paved roads are not considered barriers." (CDFG 2003, page 7 [emphasis added].)

As described above not only have the nearest and next closest breeding occurrences been extirpated, but there are numerous significant and insurmountable physical barriers between the subject parcel and known breeding sites (whether presumed extant or extirpated) to the south that have further fragmented the area, reducing the potential that CTS could be present on the subject parcel. Principally among these barriers is Hearn Avenue, a heavily trafficked arterial route through southwest Santa Rosa. As referenced in the Biological Resources Assessment (WRA 2024), Trenham and Cook (2008) documented that Hearn Avenue and associated infrastructure (e.g. storm drains) provides an essentially insurmountable barrier severing possible connectivity to potential habitat to the south of Hearn Ave. Per Trenham and Cook (2008): "City of Santa Rosa data indicate that Hearn Avenue, to the immediate north, supports an average of >12,000 cars daily; Hels and Buchwald (2001) estimated that roads with this level of traffic are essentially 100% lethal to migrating amphibians. Remaining grasslands north of Hearn Avenue are blocked by this road that also has storm drains and vertical curbs that salamanders cannot climb."

Due to the lack of burrows on the site, the increasing urban development and habitat fragmentation of the area, the data from the CNDDB and the lack of nearby extant breeding sites, the City has shown substantial evidence that there is not a reasonable expectation that CTS would be taken, as defined by CESA, through implementation of the project. As such, the mitigation measures described in the EIR are adequate to mitigate potential impacts to CTS to less than significant levels.

[1]California Department of Fish and Game. *Interim Guidance on Site Assessment and Field Surveys for Determining Presence or a Negative Finding of the California Tiger Salamander*. October 2003. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83915&inline

Comment A.4: ENVIRONMENTAL DATA

CEQA requires that information developed in EIRs and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during project surveys to CNDDB. The CNDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

Response A.4: The CNDDB field survey form has not been completed as no special status species were observed on the project site during field surveys.

Comment A.5: ENVIRONMENTAL DOCUMENT FILING FEES

The project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (See: Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the EIR to assist the City in identifying and mitigating project impacts on biological resources. Questions regarding this letter or further coordination should be directed to Nick Wagner, Senior Environmental Scientist (Specialist) at (707) 428-2075 or Nicholas.Wagner@wildlife.ca.gov; or Melanie Day, Senior Environmental Scientist (Supervisory) at (707) 210-4415 or Melanie.Day@wildlife.ca.gov.

Response A.5: If/when the EIR is certified and the project is approved the City will pay all applicable fees upon filing the Notice of Determination and will continue to coordinate with CDFW as the project progresses.

4.2 REGIONAL AND LOCAL AGENCIES

B. Lytton Rancheria of California (dated May 23, 2024)

Comment B.1: First, Lytton would like to thank the City for accepting its suggested revisions to the mitigation measures. I think it points to the good working relationship between the Tribe and the City. The only concern Lytton has is regard to the discussion portion to indicates that there will be collection and evaluation of any finds on site. Many tribes, including Lytton, do not want testing done on artifacts and in fact, would prefer that the items be reburied on the site. This is especially true for items that are conserved sacred or ceremonial. The onsite monitors are there to provide such crucial cultural information.

Response B.1: The comment refers to the discussion of approaches to address the potential for cumulative impacts to cultural resources. The mitigation measures used on individual projects would be subject to the conditions related to the location of the site and potential for cultural resources to be present. All cumulative projects would require compliance with applicable federal, state, and local laws and regulations. The text related to collection and evaluation of cultural resources has been deleted as shown in Section 5.0, Draft EIR Text Revisions.

4.3 ORGANIZATIONS, BUSINESSES, AND INDIVIDUALS

C. Ana Munoz (dated June 10, 2024)

Comment C.1: My name is Ana Munoz, I live near the Park being discussed and I have a few comments.

I have owned my house since 2011 and since I moved into the area there has been a constant desire first by the county of Sonoma and now the City of Santa Rosa to develop the park beyond what it is today. No doubt that the City will benefit financially by developing the park fully with restrooms, parking lots, paved walks, BBQ pits and playground, we know that when a grant is received, a good portion of the funds are destined for the City's use.

The City is not going to stop trying to push the development of the park until they get it, I have attended multiple meetings and every time there are meetings, public input, and manipulation of the desire of the people who are impacted by the development. I understand that my comments will fall in deaf ears because there is a conflict of interest.

However, the city will make a great mistake by destroying the existing park. Every time we have had meetings there is overwhelming desire to keep the park in its natural state. All it needs is a small budget to have quarterly paths' maintenance and grass mowing. Perhaps adding more native trees and shrubs and cleaning the creek to prevent mosquitoes.

Response C.1: Contrary to the commenter's assertion, the project does not propose to destroy but rather enhance the park. Indeed, the project will require all trees to be removed as part of the project to be replaced with new tree plantings and the species of replacement tree plantings would be determined consistent with requirements of the City's Tree Ordinance and CDFW permits and would include the use of native trees. The City will also work with community groups to plant native grassland species in the northern sections of the park. Finally, the project does not propose and will not involve any modifications to or improvements within the bed or banks of Roseland Creek.

Comment C.2: Children play in the park and enjoy it as is. If we want playgrounds we have several within a mile radius. Rather than destroying the natural state of the park perhaps improving traffic flow from the 5 or more elementary schools in the immediate vicinity will make us happier since we don't have to have gridlock from parents driving children to and from school and making it impossible for the general public to conduct business.

Response C.2: The proposed park enhancements and associated playground is intended to provide parkland for planned growth in the Roseland area consistent with the City's General Plan and the Roseland Area/Sebastopol Road Specific Plan. The comment regarding the availability of playgrounds within a one-mile radius is acknowledged. The project proposes a park and does not involve any changes to the roadway network or improvements that would substantially affect traffic flow in the surrounding area.

Comment C.3: Building sanitation facilities will bring vagrants and criminal activity to an area that is relatively calm and introducing vices to our young children.

Response C.3: The provision of restrooms on the project site is intended for general public use during daylight hours. The City will close vehicular gates and lock restrooms on a nightly basis. According to the American Planning Association, researchers at the University of Illinois at Urbana-Champaign have found that green spaces adjacent to residential areas create neighborhoods with fewer violent and property crimes.[2] To the extent encampment or criminal activity is observed at the park, area residents should continue to contact the Santa Rosa Police Department.

Comment C.4: For the past 12 years I have said to maintain the park as a nature park without infrastructure.

We have several parks withing walking distance with what you want to add to this park. Save the money and improve and maintain what we have, make them child and families friendly.

We want our children to have parks that are safe free of criminal activity.

This park is unique in its natural state with the creek habitat and native trees and fauna. improve what is there do not create another concrete disaster.

Response C.4: The commenter's opinion that the project site should remain in its current condition is acknowledged.

D. California Wildlife Foundation (dated May 30, 2024)

Comment D.1: The California Oaks program of the California Wildlife Foundation works to conserve oak ecosystems because of their critical role in sequestering carbon, maintaining healthy watersheds, providing plant and wildlife habitat, and sustaining cultural values. California Wildlife Foundation/California Oaks (CWF/CO) is writing about deficiencies of and problems with the Roseland Creek Community Park Master Plan Draft Environmental Impact Report (DEIR). This letter was prepared at the request of the Milo Baker Chapter of California Native Plant Society.

[2] American Planning Association. *City Parks Forum Briefing Papers: How cities use parks to…Create Safer Neighborhoods.* 2003. https://www.brec.org/assets/General_Info/Why_R_Parks_Important/Papers/Parks-Create-Safer-Neighborhoods.pdf

California Native Plant Society is a member of California Oaks Coalition, which brings together 80 international, national, Tribal, state, regional, and local organizations to conserve and perpetuate the state's primary old-growth resource.

The park's design should protect the beauty, shade, habitat, flood protection, and carbon sequestration and cultural values of the land's oaks. These trees enhance the livability of surrounding communities by lowering air and soil temperatures, providing cooling shade, improving air and water quality, and providing a restorative natural environment in an area of Santa Rosa where natural areas are deficient.

Improvements to lands protected by a conservation easement should be protective of oaks. Appendix C of the DEIR, Section 3.3, Tree Impact Assessment, discusses the Oak Protection Area that is part of the conservation easement for 1400 Burbank Avenue, and the easement's provisions for low-intensity recreational and educational uses. The proposed removal of heritage valley oaks for trail alignment and paving would degrade the beauty, shade, habitat, flood protection, and cultural and carbon sequestration values that should be protected by the easement. Heritage oaks also provide seedlings for future oaks in this area, which if removed, would materially impair or interfere with the conservation values that are to be protected under the conservation easement. All trails should be designed to keep heritage trees standing. The DEIR is deficient in addressing this violation of the conservation easement. The conservation easement 3.0 (b) Statement of Purpose states, "Protect and preserve the natural resources of the property, including its riparian corridor and oak savanna" The conservation easement also "prohibits and prevents any use of the property that will materially impair or interfere with the conservation values of the property." All trails should be developed to go around heritage trees and to protect their root systems.

> **Response D.1:** The proposed project will be developed consistent with the requirements of the existing easements for the properties. As stated in the Land Use section of the Draft EIR (pg. 107), the project adheres to the requirements of the conservation easement for 1400 Burbank Avenue which allows for low-intensity recreational and educational uses within the Oak Preservation Area. The park improvements will not result in impervious surfaces of more than 20 percent on this property. The Sonoma County Agricultural Preservation and Open Space District (SCAPOSD) will review the Master Plan prior to implementation to ensure the requirements of the SCAPOSD easement are adhered to with development of the park. The conservation easement allows for the construction of vehicular access to the property and trails following the length of Roseland Creek within the Natural Area designated in the easement. The Master Plan would not otherwise result in the removal of native trees and would not remove trees for trail construction in the Oak Preservation Area. The proposed Master Plan is consistent with the Conservation Purpose of the easement.

Comment D.2: Significant trimming of valley oak tree #106, which is growing in the site's valley oak woodland, should not be carried out. Significant trimming is harmful to oak trees. (CWF/CO refers you to page four of Care of California's Native Oaks, which has a section on oak pruning.) The proposed action would damage the ecological importance and sensitivity of valley oak woodland. As a State Ranked 3 community, valley oak woodland is classified as vulnerable due to a restricted

range, relatively few populations, recent and widespread declines, or other factors making it vulnerable to extirpation. The proposed significant trimming of tree #106 should not occur.

> **Response D.2:** The Draft EIR contains detailed measures, consistent with the City's Tree Ordinance, to limit impacts to trees on the project site (see Section 3.4.2.1, pgs. 55-57). The City's Tree Ordinance requires 2 to 1 replacement with the same genus and species for each six inches of tree diameter for removed trees. Consistent with the City Code (Chapter 17-24), an ISA-Certified Arborist is required to monitor work on the site near heritage trees to avoid improper pruning and disturbance to the root zone that is known to be harmful to tree health and structure, including valley oaks. Any pruning of existing trees shall be performed by a licensed tree care professional and shall comply with the ANSI A300 standards and International Society of Arboriculture (ISA) Best Management Practices for Tree Pruning. The City will continue to make every effort to ensure that impacts to trees are avoided and minimized with development of the proposed park.

Comment D.3: The proposed removal of four heritage trees and construction impacts on an additional 18 heritage trees are also in violation of the Department of Parks and Recreation's mission. The discussion, in Section 5.0, Summary and Recommendations, of the potential removal of four heritage trees and potential impacts on an additional 18 heritage trees from trail alignment and paving also runs counter to the mission of the Department of Parks and Recreation. Specifically, the destruction of the site's mature and protected trees is a dereliction of the department's duty to uphold the mission of "protecting environmental resources and promoting health and wellness." An art museum would not destroy its most important artworks as part of its "improvements." Similarly, Roseland Creek Community Park should not destroy its heritage oaks.

Section D (6) of Section 17-24.050 of the City of Santa Rosa's Tree Protection Ordinance states that "No compaction of the soil within the root zone of protected trees shall occur." The root protection area, which is half again as large as the area from the trunk to the dripline of an oak, is critical to oak tree health. More detail can be found in the above-referenced Care of California's Native Oaks, which includes sections on paving and other construction activities.

> **Response D.3:** The City will consider the identified reference material, Care of California's Native Oaks, and the requirements of the City's Tree Ordinance when developing the proposed park. As shown on page 56 of the Draft EIR, the City has acknowledged the requirement to avoid compaction of the soil within the root zones of protected trees and will adhere to the City's Tree Ordinance in consultation with a Certified Arborist to minimize the effects of the project on trees throughout the project site.

Comment D.4: Mitigation for oak impacts is inadequate. The project should protect the oaks and the City of Santa Rosa should amend oak protections and mitigation requirements to reflect the tree's cultural values and importance in combatting the heat island effect, sequestering carbon, supporting biodiversity, protecting the watershed, and providing access to nature in the city. Trees that are impacted by the project should be replaced at a level that will offset the lost biomass and canopy of the removed trees and the substantial temporal loss of growth habitat structure and diversity.

The project, as currently conceived, should not be advanced. Thank you for your consideration of our comments.

Response D.4: The commenter does not provide any factual support or specific arguments to explain why it believes mitigation for potential oak tree impacts is inadequate. The City acknowledges the cultural values and benefits of the trees on site. The proposed project will result in minimal impacts to trees on the site and will not substantially alter the existing tree canopy on the site. Perhaps most importantly, the project will adhere to the City's Tree Ordinance and regulatory agency permit requirements related to tree protection and replacement. Refer to Response D.2.

E. California Native Plant Society, Milo Baker Chapter (dated May 31, 2024)

Comment E.1: The Milo Baker Chapter of the California Native Plant Society (CNPS) is providing the City of Santa Rosa with these comments on the proposed April 2024 Roseland Neighborhood Park Draft Environmental Impact Report (DEIR). The Milo Baker Chapter is the Sonoma County representative of the California Native Plant Society, and our mission is to "Conserve California native plants and their natural habitats, and increase understanding, appreciation, and horticultural use of native plants." Our members have been involved in the park planning process by attending the public meetings, providing written feedback, and visiting the site to educate local schools about the plants, habitats, and overall ecology that is present on this proposed park property.

This property has many different habitats that are in the process of natural regeneration but require some restoration actions to return the natural ecosystem functions. We greatly appreciate that the City will preserve many of the natural areas including the rare purple needlegrass grassland, the northern meadow, the oak woodland, and the habitat adjacent to Roseland Creek. We also appreciate the nature center and interpretive signs because these park elements are in alignment with the Native Plant Society's mission and would support the community's understanding and appreciation of the natural features present in this proposed park.

The following comments, both general in nature and specific to DEIR, are in aid to ensure restoration, enhancement and education within this jewel of a City park.

The EIR did not reflect the need for the restoration of Roseland Creek and the need to remove the approximately 400 linear feet of channelized and, in some areas, concrete in the creek and to make the creek more climate change resistant.

As we wrote previously in 2020, restoration of Roseland Creek should be addressed as part of the park plan. While the City has a Citywide Creek Masterplan (CCMP) that envisions restoration of this creek and the community has presented a more detailed vision of creek restoration, nothing was written in the DEIR addressing this issue. Roseland Creek's headwaters are located at the Railroad tracks near West Barham Avenue where the creek passes through private parcels in Roseland for three blocks before passing under McMinn Avenue entering proposed park property. This is the most natural upstream area of the creek and restoration, and preservation of the creek would create excellent native plant and wildlife habitat. Downstream of the park, the creek passes through open space and protected habitats and a creek trail is partially built and planned to connect near the confluence of Roseland Creek and the Laguna de Santa Rosa just west of Llano Road. Creeks can

serve as a habitat corridor that would connect the open space of the Laguna with the residents in Roseland. Habitat corridors are defined as natural areas that allow animals to move throughout areas and get much-needed habitat. Intact riparian habitat supports many bird and wildlife species that enrich our lives. A restoration plan should be included in the DEIR as part of the planning process.

Response E.1: The proposed project focuses on recreational improvements and amenities and would not modify the bed or banks of Roseland Creek. The City has a Citywide Creek Master Plan that guides their restoration of creeks throughout the City. The Recreation and Parks Department does not typically incorporate creek restoration into park projects. The City's Transportation and Public Works Department plans and implements creek restoration projects as funding becomes available. Future creek restoration for Roseland Creek may be completed as a separate project in the future as funding allows.

Comment E.2: The EIR did not cite the 2014 CCMP Appendix C Roseland Creek Restoration Plan and state how the park Master Plan will incorporate the Restoration needs of Roseland Creek.

The CCMP identifies the following: "Construct a self-maintaining channel with adequate bank-full dimensions to transport sediment, contain healthy riparian vegetation and convey the 100-year flood."

This should be addressed before construction of any Creekside amenities. The Roseland Creek Master plan cites the following Santa Rosa General Plan Policies:

OSC-D-7	Rehabilitate existing channelized waterways, as feasible, to remove concrete linings and allow for a connection between the stream channel and the natural water table. Avoid creating additional channelized waterways, unless no other alternative is available to protect human health, safety, and welfare.
OSC-D-8	Restore channelized waterways to a more natural condition which allows for more natural hydraulic functioning, including development of meanders, pools, rifles, and other stream features. Restoration should also allow for growth of riparian vegetation which effectively stabilizes banks, screens pollutants from runoff entering the channel, enhances fisheries, and provides other opportunities for natural habitat restoration.

There is no discussion in the DEIR that these policies will be implemented for this park. One of the logical areas for the creek restoration is where the community garden area is proposed. The drawing incorrectly depicts riparian habitat along the northside of the creek where there currently is no riparian habitat.

Response E.2: Restoration of Roseland Creek is beyond the scope of the proposed project. The EIR does not provide CEQA clearance for any restoration work within the creek corridor. Riparian habitat on the north side of the creek consists of riparian tree canopy that CDFW would claim jurisdiction over when reviewing the Lake and Streambed Alteration Agreement for trail and bridge construction. The project, as proposed, will not preclude implementation of the Roseland Creek Restoration Plan as described in the 2014 CCMP which expressly acknowledges that implementation

of the CCMP will take several years and perhaps decades and depends on outside partnerships and grant funding that haven't yet been secured. Please refer to Response E.1, above.

Comment E.3: The DEIR did not address invasive species removal.

The Roseland Creek Master Plan identified many moderate to highly invasive species that need to be removed prior to creation of park amenities. These species include Himalayan blackberry (*Rubus armeniacus*), cherry plum (*Prunus cerasifera*), hawthorn (*Crataegus monogyna*), woolly cotoneaster (*Cotoneaster pannosus*), harding grass (*Phalaris aquatica*), Mediterranen barley (*Hordeum marinum ssp. gussoneanum*), reed fescue (*Festuca arundinacea*), ripgut brome (*Bromus diandrus*), slim oat (*Avena barbata*), French broom (*Genista monsessulana*), Indian teasel (*Dipsacus sativus*), hairy cat's ear (*Hypochaeris radicata*), Italian thistle (*Carduus pycnocephalus ssp. pynocephalus*), periwinkle (*Vinca major*), fennel (*Foeniculum vulgare*), poison hemlock (*Conium maculatum*). A discussion of invasive species removal should be presented as part of the park plan.

Response E.3: The project proposes to construct park amenities while avoiding impacts outside areas necessary for the construction of the proposed improvements. To the extent invasive species are present in the areas proposed for park improvements, they will be removed during construction. The project also proposes to plant native species, in coordination with community groups, in the northern section of the park.

Comment E.4: The DEIR does not show a crosswalk on Burbank Avenue for the bike trail on the southside of Roseland Creek.

There is only one crossing of Burbank Avenue and it is shown to be in the northern portion of the park. If the southern trail is to be part of the Santa Rosa Bicycle and Pedestrian Master Plan, then a crosswalk is needed in this portion of the park to connect to the west side of Burbank Avenue and downstream on Roseland Creek. There are no crosswalks on the east side of Burbank Avenue. Page 10 states, "…fencing that will function as a natural barrier between vehicles and pedestrians traveling adjacent to Burbank Avenue and to help guide students to the future street crossing." The proposed crosswalk in the northern portion of the park, as proposed, will connect into the existing bus stop pullout lane. This should be changed to have the crossing tie into the existing sidewalk areas.

Response E.4: A crosswalk at the most southwestern corner of the park property was considered. However, there are already two crosswalks in close proximity. There is one existing crosswalk approximately 370 feet to the south directly in front of the new housing development that is currently under construction. The second crosswalk is planned within the Roseland Creek Community Park Master Plan to be located directly across from the school. The City's existing right-of-way may allow for a connection to be made to the existing crosswalk south of the site to ensure a continuous connection on the Santa Rosa trail system. Such a connection is dependent on development adjacent to the park, the timing of park development, availability of right-of-way, and City funding.

The proposed crosswalk in the northern section of the park was located to avoid conflicts with the Roseland Creek Elementary School driveway. The location of the crosswalk was reviewed by the City's Transportation Department. The proposed location would connect to the existing sidewalks and provide adequate space for buses using the pullout lane.

Comment E.5: The proposed multi-use trails are too wide.

The DEIR states (page 4) "The proposed multi-use trail creek crossing would be a prefabricated bridge placed on abutments outside the top of bank. The multi–use trail meanders through the oak woodland habitat area in the center of the site and connects to McMinn Avenue. The trail would be a paved 10-foot-wide path with two-foot-wide gravel shoulders on either side, providing ADA access."

Sidewalks on Burbank Avenue are not 10 feet wide, and, in some areas, they are no more than 2 feet wide, and are adjacent to the busy road of Burbank Avenue. We feel that 10-foot-wide paved trails with an additional 2 feet on either side is excessive. We recommend that 8-foot-wide trails with 1 foot gravel shoulders on either side is appropriate and are within the ADA parameters identified by the City of Santa Rosa. Emergency vehicles will still have access along this width of trail.

Response E.5: The City proposes to provide a main 10-foot-wide multi-use trail, where feasible, to avoid collisions between bicycles and pedestrians and those with special mobility needs such as wheelchairs. The Santa Rosa Bike and Pedestrian Master Plan (2018) and Caltrans Highway Design Manual (2020) both recommend 10-foot-wide pathways with two-foot shoulders. Trails with varying widths are often more costly to construct and maintain and can be confusing for the park visitor. The minimum width for the Master Plan, therefore, is set at 10 feet with variations depending on the constraints that will be reviewed when construction drawings are prepared. The final construction drawings will be developed to safely provide access through the park for all users while minimizing impacts to trees.

Comment E.6: Park improvements shall not result in impervious surfaces of more than 20 percent on the entire parcel of the park, not just 1400 Burbank Avenue property, as stated on page 5.

The Conservation Easement should not be piecemealed and should be rewritten to include the entire 20 acres under a single easement. The parameters of the easement should be standard for all of the park parcel and include impervious surfaces of no more than 20 percent.

Response E.6: As described on page 107 of the Draft EIR, easements on the northerly two parcels on the project site restrict impervious surfaces to five percent of the total easement area. At 1400 Burbank Avenue, the easement restricts impervious surfaces to no greater than 20 percent of the property. The Master Plan has been developed to adhere to the existing easements on the project site. The City intends to ultimately create one conservation easement and recreation covenant with the Sonoma County Agricultural Preservation and Open Space District to include all properties on the project site.

Comment E.7: Specific changes to DEIR

Bio Impact 1a (pages iv, page 63) – seasonality for bats
Bat seasonal dates in this area are (approximately) the following:
Maternity – April 15 – August 31
Winter Hibernation - October 15 to February 28

Therefore, if work is to be conducted in areas that may support roosting bats, and occupancy is assumed, habitat removal must be conducted between March 1 and April 15 OR August 31 and October 15. To prove absence, then one to two nocturnal surveys with appropriate night vision equipment must be conducted during those times when bats would be occupying a roost (i.e., during the maternity season). If negative findings occur, then habitat can be removed. However, if bats are present then removal must occur during the above stated times, between March 1 and April 15 OR August 31 and October 15. This would also tie in with protection measures for nesting birds.

> **Response E.7:** The proposed special-status bat mitigation measures have been revised to reflect the maternity and winter hibernation periods requested by CNPS as shown in Section 5.0, Draft EIR Text Revisions.

Comment E.8: Figure 2.2-3 Aerial Photo from 2018.

This figure should be updated to reflect the residential development on the south side of the park. There is a single parcel that is not developed but the parcel to the south at 1690 Burbank Avenue is currently under construction with 62 single family homes and 64 apartments and should be classified as residential and not rural residential.

> **Response E.8:** Figure 2.2-3 Aerial Photograph and Surrounding Land Uses has been revised to reflect the residential subdivision under construction south of the project site. Refer to Section 5.0, Draft EIR Text Revisions.

Comment E.9: Revise Appendix A Figure 4. Special Status Wildlife Documented within 5 miles of the Project Area.

The legend identifies plants and not wildlife species. In addition, the plants presented in the legend (alkali milkvetch, brittlescale, California alkali grass, etc.) do not occur in Sonoma County. Revise this Figure to reflect special status wildlife species reported in the area.

We feel that once the above comments, both general in nature and specific to the DEIR, are addressed and answered then the actions to ensure restoration, conservation and education within this jewel of a City park will be met.

> **Response E.9:** Figure 4 in Appendix B of the Draft EIR has been replaced as requested. Refer to Section 5.0, Draft EIR Text Revisions.

F. California Native Plant Society, Milo Baker Chapter (dated June 17, 2024)

Comment F.1: The California Native Plant Society (CNPS) is a science based, State-wide organization with chapters in most California counties and one in Baja, California. Our State offices

are located in Sacramento. The mission of CNPS is the conservation of California's diverse native plants and related ecosystems. We also work to increase understanding and appreciation of California's biodiversity as well as encourage horticultural use of California native plants in both private and public settings.

Members of our Education committee helped identify and speak with faculty at various Roseland District schools. All the schools expressed considerable interest in the prospect of a readily accessible outdoor classroom, a living learning landscape, within walking distance of their schools. Roseland Creek Community Park also known locally as the NeighborWood became an outdoor classroom for two teachers from Roseland University Prep High School prior to the pandemic. This unique 20-acre gem of a park was used on several occasions for projects involving biology and language arts. The students from the language arts class ultimately created a video about the park.

Our then District Supervisor, Linda Hopkins, referred to the land as a "micro wilderness". Very few fast-growing urban cities possess this type of readily accessible resource representing a multitude of public benefits including those of physical/mental health, social and community cohesiveness. National and world-wide studies have documented these benefits, particularly to people residing in economically distressed neighborhoods.

Our local CNPS chapter Conservation Committee Chair, retired wildlife consulting biologist, Trish Tatarian, BSc, MSc, and the Directors of The California Wildlife Foundation/California Oaks Program have provided comments regarding numerous flaws and omissions in the recent DEIR for Roseland Creek Community Park. We, too, have concerns which include the following:

The DEIR omitted any plans for the restoration of the section of Roseland Creek running through the Park.

Roseland Creek feeds into the Laguna de Santa Rosa and subsequently the Russian River, a major source of drinking water for County residents. There is no discussion of restoration of the natural channel including removing the concrete lining a portion of the channelized. Creek. Restoration of this portion of the creek will allow safe passage of wildlife to and from the Laguna in a restored and healthy wildlife corridor.

Healthy riparian corridors help with flood control, ground water filtration and recharge, enhance and protect biodiversity. Riparian corridors possess an unusually diverse array of plant and animal species and provide critical environmental functions. They play an essential role in moving water to local aquifers, filtering toxic materials from water via percolation through not included any of humus enriched soils, slowing flood waters with meanders, riffles and sand bars. Healthy riparian corridors with strong, well established root systems help prevent stream bank erosion.

The current DEIR did not include any mention of the 2014, appendix c, Restoration Plan or any mention of how the Park Master Plan will incorporate the critical needs of Roseland Creek, despite the identification of OSC - D-7 (Rehabilitate existing channelized waterways...) and OSC - D-8 (Restore waterways to a more natural condition...).

The Citywide Creek Master Plan states "... construct a self-maintaining channel with full-bank dimensions to transport sediments, containing healthy riparian vegetation and convey the 100 year

flood waters." These issues need to be identified and addressed before construction of any creekside amenities.

There is no discussion in the DEIR that the above policies will be implemented in this Park. One of the logical areas for Creek restoration is where the community garden is proposed. The related drawing incorrectly identified riparian habitat on the North side of the creek where none actually exists.

Response F.1: Please refer to Responses E.1 and E.2.

Comment F.2: The current DEIR does not address invasive species removal.

The Roseland Creek Master Plan identified many moderate to highly invasive plants species needing removal prior to creation of proposed Park amenities. Other comment letters provide detailed lists of these plants. A discussion of the non-chemical removal of invasive plant species should be included as part of the park plan.

Both restoration and invasive plants species removal present a unique opportunity for the inclusion of Roseland's culturally diverse residents in an Eco-Cultural model of community land stewardship. Families and individuals would have the opportunity to explore and share the histories of both invasive plant species as well as native plants, their cultural history and uses. Demonstrations, workshops, tastings, arts and crafts uses can be shared and explored as a way of drawing our diverse community together with a shared purpose. Indigenous folks, Latino, African American, Eritrean and other groups will be able to share in the literal "tending of a Park wide wild garden", a concept embraced today as well as for thousands of years by California's first peoples.

All these activities would help participants restore their connection to the land as well as develop a true sense of 'place' resulting in pride, connections to community and land.

Several local organizations including CNPS, the Laguna Foundation, Sonoma Ecology Center, Point Blue's STRAW program have These skilled staff and volunteers in the areas of invasives removal, native plant propagation and restoration. These groups could work with Parks and Recreation and local residents to effect a community program of invasive plants removal and restoration. The existing native species in the Park would have the space to grow and expand in this unique place.

Response F.2: Please refer to Response E.3.

Comment F.3: The current DEIR does not address a controlled crosswalk on Burbank Avenue for the bike/pedestrian trail on the South side of the park.

The only crosswalk shown in the current plan is adjacent to a bus stop pull out at the North end of the Park. There are few sidewalks on Burbank Avenue. Originally classified as a "rural residential" road, Burbank has become an alternate commuter route with excessive speeding problems now exacerbated by increased traffic resulting from substantial new housing development in the Roseland area. The current plan needs to be reconsidered.

Response F.3: A crosswalk at the most southwestern corner of the park property was considered. However, there are already two crosswalks in close proximity. There is one existing crosswalk approximately 370 feet to the south directly in front of the new housing development that is currently under construction. The second crosswalk is planned within the Roseland Creek Community Park Master Plan to be located directly across from the school. The City's existing right-of-way may allow for a connection to be made to the existing crosswalk south of the site to ensure a continuous connection on the Santa Rosa trail system. Such a connection is dependent on development adjacent to the park, the timing of park development, availability of right-of-way, and City funding.

Comment F.4: The proposed multiple use Park trails are wider than need be and will cause soil compaction, severe water runoff and damage to trees and plants.

Ten-foot-wide trails with two feet of gravel shoulder on each side is excessive. Eight foot wide trails with one foot gravel shoulders would comply with ADA requirements and will still provide access for emergency and maintenance vehicles. Paving materials should be permeable to allow water runoff to percolate into the soils. A good example of permeable paving can be seen in the large parking lot located at the rear of the SRJC Petaluma Campus. The original conservation easement for the Park calls for no more than 20 percent impermeable paving. The conservation easement should be consistent throughout the park, not piecemealed.

Response F.4: Refer to Response E.6.

Comment F.5: Removal of heritage oaks for park amenities is not appropriate for this park.

California's native oak woodlands are among the richest and most diverse of our ecosystems. The oak woodland/savannah supports more life forms than any other tree genus in California. Our native oaks sustain an incredibly complex web of life above and below ground including thousands of needed insects, hundreds of bird, reptile, amphibian and mammal species. Our oaks and plant species that live in native oak ecosystems are literally champions of carbon sequestration, soil stabilization and soil management. They provide all of us clean air and water, cooler air and soil temperatures, numerous pollinators for our gardens. The design of Roseland Creek Community Park should protect the shade, beauty, rich habitat, flood protection, carbon sequestration and cultural values of these oaks. Our native oaks enhance the biodiversity of the area. Our native oak ecosystems enhance the live ability of surrounding communities by lowering air and soil temperatures, improving air and water quality and providing a restorative natural environment. In this area of Santa Rosa, fast growing and low income, there is an obvious lack of natural areas easily accessible/bikeable/ walkable. Park amenities should be redesigned to avoid all heritage oaks.

We fully concur with and support the comments/suggestions made by Janet Cobb, Executive Officer of the California Wildlife Foundation and Angela Moskow, California Oaks Program Director in their comments letter of May 30, 2024. Topics covered included the following:

a. Improvements to lands protected by a conservation easement should be protective of oaks.
b. Significant trimming of valley oak #106 should not be carried out.

c. The proposed removal of four heritage trees are also in violation of the Department of Parks and Recreation's mission.
d. Mitigation for oak pacts is inadequate.
e. This project as currently conceived should not be advanced.

We appreciate the opportunity to submit constructive comments regarding the current DEIR for Roseland Creek Community Park.

Response F.5: Refer to Responses D.2 and D.4. The City acknowledges the commenter's position on and concern for oak trees/woodlands.

G. David Jarrell (dated May 12, 2024)

Comment G.1: My name is David Jarrell, as a 30 year resident of the Roseland area it is nice to see we may get a park in our neighborhood. One thing I have not seen in the plans is a dog park. There are a lot of area residents who walk their dogs daily and many area's lack sidewalks and safety can be an issue. The nearest real dog park is at A Place to Play but the distance means you have to drive there. At 19.49 acres a ½ acre dog park would be easy to include and require minimal maintenance. I don't believe a dog park would affect the Environmental Impact in any measurable way and I feel it would enhance the overall park greatly.

Response G.1: The City acknowledges the commenter's request that a dog park be included in the Master Plan. The City had developed various conceptual Master Plan alternatives for community input in the past, some of which included a dog park. The proposed Master Plan is the result of input from a variety of stakeholders and seeks to balance the desire of the community to maintain the majority of the park in its current state while allowing for active recreation within a limited area of the park. Based on that extensive process with all stakeholders the inclusion of a dog park was not proposed in the Master Plan or considered in the EIR for the project.

H. Diane Ballard (dated May 17, 2024)

Comment H.1: This is regarding the Roseland Creek Community Park. Please keep park and NOT parking spaces. What our community needs is more parks and not development. Parks make life better!

Response H.1: As described in Draft EIR Section 2.2.2.1 Access, Circulation, and Parking, the project proposes a limited number of parking spaces that will be constructed concurrent with the park amenities and immediately adjacent to the amenities they're intended to serve. Additionally, conservation easements on the park property significantly limit the amount of impervious surfaces on the site. All proposed parking areas and walkways will be constructed with permeable pavement, except for areas where extra support is needed for ADA compliance.

I. Duane De Witt (dated June 17, 2024)

Comment I.1: Inadequacies abound in this so called Draft Environmental Impact Report for a proposed Roseland Creek Park. This draft is an inadequate report needing to be redone in many ways from start to finish.

Before detailing some of the main inadequacies an important point must be made about the inadequate access to the draft report for review by disadvantaged and poor Roseland residents. The report was not made available for residents in the local libraries as usually done with major government documents on proposed projects. This would seem to be a violation of the city of Santa Rosa guidelines for open government and efforts for inclusion of disadvantaged populations such as Roseland residents in the public policy decision making processes. Also a Spanish speaking person stated a Spanish translation was not available to them. This is inadequate.

> **Response I.1:** Print copies of the Draft EIR were available for public review at the Municipal Services Center North and the Finley Community Center. Additionally, notice of the availability of the Draft EIR was distributed via direct mail postcards in English and Spanish to over 11,000 residents and businesses, the City Connections newsletter, the City's website, Nextdoor, and emails to all previous meeting attendees and local tribal nations. Announcements of the public review period were made in the Press Democrat newspaper and the KSRO radio station. The City also posted notice of the availability of the Draft EIR in English and Spanish in prominent locations at the project site. Spanish translations are not required via CEQA or City code or City policy.

Comment I.2: To begin, one main inadequacy is the project is basically a road building and parking lot construction project centered first and foremost on automobiles and not Roseland Creek riparian corridor preservation and restoration. Roseland Creek needs to be front and center in all discussions of what will occur at any new Roseland Creek Park. Because Roseland Creek waterway is not adequately addressed in this draft report the entire document becomes legally suspect and totally inadequate.

> **Response I.2:** The proposed project is a Master Plan for a new community park. The proposed Master Plan for the park shows two paved vehicle entrances to the park, both from Burbank Avenue. Each of the two entrances leads to a small parking lot, the more northerly lot containing 19 parking spaces and the southerly lot containing 17 parking spaces. The proposed parking spaces will be constructed concurrent with the park amenities and immediately adjacent to the amenities they're intended to serve. The City has a Citywide Creek Master Plan that guides their restoration of creeks throughout the City. The Recreation and Parks Department does not typically incorporate creek restoration into park projects. The City's Transportation and Public Works Department plans and implements creek restoration projects as broader partnerships and grant funding becomes available. Future creek restoration for Roseland Creek may be completed as a separate project in the future as funding allows and this particular project does not prohibit or inhibit future creek restoration efforts in any way.

Comment I.3: Next the city of Santa Rosa has never done adequate management and maintenance of the properties at 1027 McMinn Ave., 1360 Burbank Ave., 1370 Burbank Ave., and 1400 Burbank Ave. once the properties were purchased with Sonoma County taxpayers' money and then deeded over to the city of Santa Rosa. Therefore it cannot be assumed the management, maintenance, and mitigation measures the report has in mind for any and all construction activities will be adequate. This letter states the DEIR is inadequate.

Santa Rosa claims to have an interest in "sustainability", therefore this report should show how the city intends to secure the fullest possible present, and long term, biological and ecological benefits for this park which will be under a conservation easement held by the Sonoma County Agricultural Preservation and Open Space District. The first conservation easement with this agency and Santa Rosa from 2011 is on the 5.9 acres at 1400 Burbank Ave. This was followed by the eleven acres at the north of the park addresses 1027 McMinn Ave. and 1360 Burbank Ave. The city has not been doing the necessary stewardship of this land and cannot be trusted to keep its word from the DEIR addressed here.

Response I.3: In accordance with the City's Business and Strategic Action Plan, the City is providing a basic level of service to the project site as undeveloped park land. Once the park is developed, a moderate level of service will be provided based on the passive use of the site and limited number of amenities proposed. For example, maintenance tasks, such as turf mowing, are anticipated to be completed on a bi-weekly basis during the growing season as occasional use of the lawn area is anticipated. Additionally, special purpose maintenance will be interlaced with the general maintenance as necessitated by the proposed improvements. The frequency of maintenance will vary from daily trash removal to annual maintenance of benches, structures, and signage. The City will adhere to the requirements of the conservation easements for the project site and the mitigation, monitoring, and reporting program adopted for CEQA compliance.

Comment I.4: Also, it is a canard to say there is the possibility of housing being built on the land at 1370 Burbank Ave. The city is in negotiations with the Sonoma County Agricultural Preservation and Open Space District to include this property under the existing conservation easements they cannot be decrease in strength.

Response I.4: CEQA requires that the EIR analyze a No Project Alternative which in addition to leaving the project site in its current condition also considers the practical result of the project's non-approval. The consideration of housing on 1370 Burbank Avenue is consistent with its existing General Plan land use designation and fulfills this requirement. As discussed in Section 3.11 Land Use (pgs. 106-107), the project site is designated for *Medium-Density Residential* at a minimum of 8.0 dwelling units per acre and *Community Park*. The City of Santa Rosa Zoning Ordinance designates the project site as *Open Space – Recreation (OSR-SR)* and *Multi Family Residential (R-3-18-SR)* in a Scenic Road combining district *(-SR)*. Although it's the intent of the City to provide a community park on the entire project site, there is no existing conservation easement or other restriction that would preclude the use of the property for residential uses consistent with its General Plan land use designation and zoning.

Comment I.5: Of utmost importance the report is inadequate in regards to dealing with California Tiger Salamanders. It must be assumed by the city this area is potential habitat for CTS and the city must prove they are not onsite before any type of construction projects begin at the site. This means the city must follow the CTS survey protocol and procedures to prove no CTS are at the site.

> **Response I.5:** The commenter expresses his opinion regarding the existence of CTS and CTS habitat on the site but does not provide any facts/evidence in support. WRA's determination that CTS is unlikely to occur on the project site was based on USFWS guidance related to their designation of critical habitat as well as published sources that were cited in the Biological Resources Assessment. Refer to Response A.3.

Comment I.6: Also there are areas of Purple Needlegrass on the southern portion of the park at 1400 Burbank Ave. The city must show how the area will be protected from encroachment by any proposed activities. The report is inadequate in this regard.

> **Response I.6:** The proposed trail system has been designed to encircle the mapped purple needlegrass grassland at 1400 Burbank Avenue. As described in the EIR Project Description (page 4), the proposed project will locate trails around the perimeter of the mapped purple needlegrass grasslands area and provide interpretive signage adjacent to it. No active uses or other modifications to the use of this area are proposed by the project.

Comment I.7: Next because this project is more about automobiles and trucks driving onto the property and into the previously unpaved areas, the city needs to accurately assess the impacts of greenhouse gas pollution on the surrounding area. No accurate traffic studies have been on Burbank Ave. in many years. Now with the cumulative impacts of increased automobile traffic from use of Roseland Creek Elementary School as well as new housing developments totaling hundreds of units near the park the city must prove pollution from even more traffic will not negatively impact the flora and fauna as well as nearby residents. The report is inadequate in this regard.

> **Response I.7:** As described in the Draft EIR Section 2.3 (page 10), the objectives of the project are to provide adequate park acreage in the Roseland area to serve residents within a one-mile radius. The project will be constructed consistent with conservation easements that limit paved areas on the site. The project will also provide bicycle and pedestrian trails throughout the site to allow access for non-vehicular modes of travel. As discussed in the Draft EIR Project Description (page 5), all proposed parking areas and walkways will be constructed with permeable pavement, except for areas where extra support is needed for ADA compliance. Vehicular access to the site and parking areas are intended to comply with emergency vehicle and ADA requirements. Greenhouse gas emissions and their associated impacts are cumulative in nature and, therefore, the thresholds identified at a project level are also indicative of a cumulative impact. As described in Section 3.8.2.2 of the EIR, the project will adhere to applicable measures in the City's Climate Action Plan resulting in a less than significant greenhouse gas emissions impact at a project and cumulative level. Additionally, the proposed park amenities are focused in previously disturbed areas of the project site and will only result in approximately 1.37 acres of

permanent impact outside of those previously disturbed areas. The cumulative impact of housing in the area, in addition to the Roseland Creek Elementary School, was previously addressed in the Roseland Area/Sebastopol Road Specific Plan and Roseland Area Annexation Projects EIR.

Comment I.8: Fire safety needs to be addressed because the city is typically delinquent in weed abatement. Numerous fires have been fought in the meadow and the woodland as well as next to the creek on the south side. The Burbank Ave. Fire Station Engine No. 8 has responded to numerous out of control fires which if not fought quickly might have spread to nearby housing to the east of the project site. One aspect of this is shows Fire trucks and city maintenance vehicles are ABLE to work the site without needing paved roads.

Response I.8: Fire Department records of calls to the project site were reviewed for the last five years. The Fire Department responded to one grass fire on the south side of Roseland Creek whose source of ignition was unknown. Two additional calls related to fires were located on the north side of Roseland Creek. The fires were not left unattended, were started by individuals for warming and cooking, and were extinguished at the direction of the Fire Department. Neither of the attended fires resulted in spread to adjacent vegetation.

The project proposes the use of permeable pavement except where necessary to comply with Fire Code and ADA requirements.

Comment I.9: Regarding paved roads and parking lots the amount of stormwater pollution from contaminated runoff has not been adequately addressed. This inadequacy must be fully addressed in the report. Noting oil and fluids polluting the parking lots and roads should be a main concern as stormwater will runoff into the creek. The current draft is inadequate in this respect.

Response I.9: As described in Section 3.10 Hydrology and Water Quality, the project will implement stormwater treatment measures consistent with the RWQCB's Phase I MS4 Permit. The City as a co-permittee to the Phase I MS4 Permit is responsible for ensuring all projects disturbing greater than 10,000 square feet adhere to the permit requirements. Additionally, the project will implement best management practices to avoid impacts to surface waters during project construction. Compliance with the statewide Construction General Permit and Phase I MS4 Permit will ensure stormwater pollution and contaminated runoff will not impact Roseland Creek.

Comment I.10: Before the draft was released I submitted an "environmentally superior alternative" for the project in which I call for the project to be an eight point five acre neighborhood park adjacent to an eleven acre nature preserve. Today I submit an "environmentally superior alternative" map for this proposed project also. The draft EIR has not looked at this reasonable alternative which is legally required to be done by the "Final" EIR. Therefore I again point out the Draft EIR is inadequate for neglecting the previously done comment by me in the appraisal of proposed projects.

Response I.10: The EIR included a Neighborwood Master Plan Alternative that was previously submitted by the commenter and which is substantially similar to the map

referenced in the comment. The Neighborwood Master Plan Alternative includes a 12 space parking lot to serve the nature center north of Roseland Creek but also omits any parking south of Roseland Creek. CEQA requires EIRs to identify and discuss project alternatives in furtherance of the fundamental CEQA policy that public agencies should require the implementation of feasible mitigation measures or project alternatives to reduce the project's potentially significant impacts, but an EIR need only discuss a reasonable range of alternatives and need not consider all potential alternatives to a project. The Draft EIR explains why alternate location alternatives were initially considered but rejected and then goes on to identify and discuss a robust and reasonable range of six different project alternatives, including the Neighborwood Master Plan Alternative which, as noted above, was previously submitted by the commenter and is substantially similar to the alternative provided as part of this particular comment letter. The commenter neither acknowledges the Draft EIRs six alternatives nor provides any argument that those six alternatives fail to meet the reasonable range of alternatives requirement.

Comment I.11: The 2010 project which was agreed upon by the community and the city needs to be used in my humble opinion if the city chooses to ignore the desires of the community for a neighborhood park only with a preserve. Many of us residents were bamboozled for a dishonest former city director of the Recreation and Parks Department who met with us and the Santa Rosa City Councilman Gary Wysocky. WE were told the first parcel to be purchased at 1400 Burbank Ave. was absolutely necessary to provide for the bikeway/greenway proposed in the 2004 Roseland Creek Concept Plan. Further he told residents the reason to call it a community park was because the city would seek more acreage to the south to make an at least 40 acre park to preserve nature in Roseland.

Response I.11: The proposed Master Plan was developed with a substantial amount of community input received in over 30 meetings for the project. The Board of Community Services reviewed and recommended approval of the proposed Master Plan in July 2021. The Master Plan, as proposed, incorporates input from the Roseland area community and was developed to balance the desire for both active and passive recreational uses. The 2010 Concept Plan Alternative was also considered in the Draft EIR (page 167). The 2010 Concept Plan Alternative would construct wetlands on the site and expand the lawn area south of Roseland Creek resulting in increased construction period impacts, purple needlegrass habitat impacts, and increased water use. Additionally, the construction of wetlands on the site were found unlikely to be successful due to the soil types present and the limited watershed available to supply runoff to the proposed wetlands. For the reasons discussed above, the EIR concluded that the 2010 Concept Plan Alternative is less desirable than the proposed Master Plan. This comment does not raise any questions regarding the adequacy of the EIR, therefore, no further response is provided.

Comment I.12: Last, but not least, the proposal for a Pomo Indian "interpretive" village at the Roseland Creek site is something many residents want. A group of residents are advocating for the entire site to be named Pomo Park and Preserve. The city should honor Pomo at this site.

This short letter reminds you to adequately address my previous letter because it is not there in this Draft EIR my claim is the document is again inadequate. More comments will be forthcoming.

> **Response I.12:** The City has consulted with local tribal nations that are registered with the City and incorporated their suggestions in the proposed Master Plan. A Pomo Indian interpretive village was not requested by the local tribal nations and is not being considered for inclusion in the proposed Master Plan for the park. The EIR has adequately addressed all potential environmental impacts resulting from implementation of the Master Plan and determined the park will result in less than significant impacts with the incorporation of mitigation measures.

J. Erika Erzberger (dated June 13, 2024)

Comment J.1: I am writing to ask that you please prioritize conservation and restoration in your plans for this area. I visited the Roseland Creek Community Park recently for a plant walk and was rewarded by hearing birds, seeing amazing mature oaks, experiencing multiple habitat types, and even seeing a baby turkey (turkey-let? turkey-chick?). I could sense the uniqueness of this wild place within city neighborhoods. With so much concern these days about access to nature and the health benefits conferred by time in nature, this is special resource for the residents of Santa Rosa.

Transforming this pocket of nature into a traditional city park would be a missed opportunity. Please, keep this land free of roads, parking lots, pavement, lawns, and landscaping. This could be a center for indigenous cultural practices, school biology lessons, forest therapy, and of course plant walks. Thank you for your consideration.

> **Response J.1:** The Master Plan includes a variety of park uses including trails, a nature center, community garden or outdoor classroom north of Roseland Creek and active park uses focused in the areas south of Roseland Creek. The project has been designed to limit tree removal, avoid native grasses, and place bridge improvements outside the top of the bank of Roseland Creek. The majority of the proposed park will remain undeveloped with limited traditional park amenities. Three of the four parcels on the project site are subject to the requirements of conservation easements that limit the amount of development allowed on the site. The proposed Master Plan will adhere to the requirements of the conservation easements adopted for the project site.

K. Fred Krueger (dated June 9, 2024)

Comment K.1: Thank you for your letter introducing the Draft EIR on the Roseland Creek Park. This letter is my quick response to the Roseland Creek Park draft Environmental Impact Report and your request for reflection and commentary. I will try and elaborate on these items if I can get this finished this afternoon.

The Draft Report in relation to the local community

This draft Environmental Impact Report is big – over 465 pages long. This includes the formal text, the map reports, the BC Laboratory reports and the memorandum at the end. Do you think it is reasonable for the City to expect local residents within 45 days (April 25 to June 10) to read through

all this material, digest its contents and make our own informed responses in this month and half period? Most of us have full time jobs, sometimes taking up to ten or more hours per day. For most neighbors this is too much to ask.

To express this in more specific terms, Santa Rosa City officials are asking citizens to tour through an average of over 10 pages per day, each day during this response period; digest the implications and develop an informed response back the Santa Rosa Parks and Recreation Dept. This is not fair. In fact you would get much more of a turnout and better citizen awareness, besides being a equitable and just process, if the City would begin with a public introduction to the DEIR along with an oral presentation of the issues and then begin the reflection and commentary on this report. This way you would get a lot more public participation. We are willing, even eager to participate, but citizens need time to process the issues and respond thoughtfully.

> **Response K.1:** The Draft EIR circulation of 45 days is consistent with the requirements of CEQA. The comment period was extended to 53 days to accommodate a request by CDFW for additional review time. The City has complied with the requirements of CEQA to provide the public with an opportunity to review the Draft EIR and provide input.

Comment K.2: Demolition of the footbridge and tree removal on the project site

> See: Impact BIO-1a: Demolition of the footbridge and tree removal on the project site could potentially impact special-status bat species that may use them as a roost, and could result in the direct removal, abandonment, or destruction of the maternity roost.

Why is there consideration of tree removal in what is supposed to be a nature park? Park policy should be to preserve as many trees as possible. They suppress noise, set up a quieting atmosphere and sequester carbon dioxide which is a stated policy of the City of Santa rosa.

We already know that bats are present in the park as they can be observed right before dark on most evenings. Where they roost is not known but we do have a professional bat biologist in the neighborhood who could help address any issues dealing with bats.

From the perspective of the neighbors, the striving of the park should be to preserve as many trees as possible and have no contingency for tree removal.

> **Response K.2:** The City developed the Master Plan with a focus on limiting impacts to trees and those efforts resulted in a project that proposes the removal of only four trees on the project site. The proposed tree removal will not substantially alter the existing tree canopy on the site. The project will adhere to the City's Tree Ordinance and regulatory agency permit requirements related to tree protection and replacement. The project has also incorporated measures to protect bats located on the project site. In accordance with MM BIO-1a.1, the project biologist will complete roost assessment surveys prior to construction on the site. Refer to Section 5.0 Draft EIR Text Revisions for additional bat-related mitigation requirements on pages iv and 49 of the Draft EIR.

Comment K.3: The Noise Level as Proposed in the DEIR

> See: MM NOI-1.1: "The City's contractor will develop a construction noise mitigation plan to ensure noise levels would be reduced to 80 dBA Leq at sensitive receptors. The construction noise mitigation plan may incorporate, but would not be limited to, the following best management practices."

The DEIR proposes noises up to 80 decibels.

This level is way too high. Medical doctors say that this high level is associated with Noise Induced Hearing Loss (NIHL).

NIHL tends to become a risk at around 70 dB. To have this level in a residential neighborhood is dangerous and would be as assault on neighbors and certainly a nuisance. High noise levels are associated with stress, animosity and Loud noise can create physical and psychological stress, reduce productivity, interfere with communication and concentration, and contribute to workplace accidents and injuries by making it difficult to hear warning signals. Besides, who would bear responsibility for damages to neighbors' hearing?

See website on hearing: https://decibelpro.app/blog/how-loud-is-80-decibels/

See also OSHA statement on the effects of Noise: https://www.osha.gov/noise/health-effects

Here is an introduction to the OSHA statement on noise:

Exposure to high levels of noise can cause permanent hearing loss. Neither surgery nor a hearing aid can correct this type of hearing loss. Short term exposure to loud noise can also cause a temporary change in hearing (your ears may feel stuffed up) or a ringing in your ears (tinnitus). These short-term problems may go away within a few minutes or hours after leaving the noise. However, repeated exposures to loud noise can lead to permanent tinnitus and/or hearing loss.

Loud noise can create physical and psychological stress, reduce productivity, interfere with communication and concentration, and contribute to workplace accidents and injuries by making it difficult to hear warning signals. The effects of noise induced hearing loss can be profound, limiting your ability to hear high frequency sounds, understand speech, and seriously impairing your ability to communicate.

> **Response K.3:** Construction of the park will result in short-term elevated noise levels. Construction hours on the site will be limited to daytime hours to avoid impacts to adjacent uses. The construction noise mitigation plan will also identify a disturbance coordinator to respond to complaints and implement reasonable measures to correct any issues.

Comment K.4: Construction Hours

> See: MM NOI-1.1: The City's contractor will develop a construction noise mitigation plan to ensure noise levels would be reduced to 80 dBA Leq at sensitive receptors.

* Limit construction hours from 7:00 am to 7:00 pm Mondays through Saturdays, and 10:00 am to 6:00 pm on Sundays and holidays.

Portions of the park adjoin residential areas. Work beginning at 7:00 AM is way too early for a residential area. There is no need to start so early and continue so late into the evening. Please explain why this is proposed for such an early and/or late a time.

Response K.4: The allowed hours of construction are intended to limit construction to daytime and avoid the potential for sleep disturbance. The City's Municipal Code does not otherwise restrict construction hours in the city.

Comment K.5: Active Use Master Plan Alternative

See: The Active Use Master Plan Alternative assumes a public gathering area with a restroom and shaded pavilion where the former residence at 1027 McMinn Avenue was located. A semi-circular driveway would be provided from Burbank Avenue in front of the nature center and would provide access to a single large parking lot for the nature center and dog park. A group picnic Roseland Creek Community Park Master Plan xi Draft EIR City of Santa Rosa April 2024 area and dog park would be provided behind the nature center on the 1370 Burbank Avenue property. South of Roseland Creek an expanded turf area would be provided with a picnic area along the southern property boundary and a Pomo interpretive area. This Master Plan Alternative would also construct sidewalk along the Burbank Avenue project frontage, on-street parking, and a bike lane.

This paragraph is poorly written and it is not clear exactly what is proposed. Neighbors in this region have spoken clearly and repeatedly on these issues We do not support active sports inside a quiet nature area. This would obviate the goals and requirements of a quiet nature park.

Response K.5: The Active Use Master Plan Alternative was included in the Draft EIR in order to provide a reasonable range of alternatives for the City's consideration. The Draft EIR's textual description of the alternative was also supported by Figure 7.4-1 to further demonstrate and depict the components of the alternative (Draft EIR pgs. 156-157). The commenter's lack of support for active uses at the site as shown in Figure 7.4-1 is acknowledged.

Comment K.6: Artificial Turf

Artificial turf within the park would either be a source of toxic material or an unnecessary drain on water supplies.

The Artificial Turf Field Alternative assumes that the proposed multi-use lawn area would be landscaped with artificial turf rather than grass. The Artificial Turf Field Alternative would use less water during operation of the proposed community park.

It should be recognized that most synthetic turf surfaces contain toxic materials.

Numerous studies indicate that chemicals identified in artificial turf, include polycyclic aromatic hydrocarbons (PAHs), phthalates (a gender-bending chemical), and per- and polyfluoroalkyl substances (PFAS). These are known carcinogens, neurotoxicants, mutagens, and endocrine disruptors.

Please see the National Institutes of Health report on "Health Impacts of Artificial Turf: Toxicity Studies, Challenges, and Future Directions"
https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10262297/

See the introduction to the statement by the National Institutes of Health. This is an introduction to this issue. The following is only part of the introduction to this issue:

> "Many communities around the country are undergoing contentious battles over the installation of artificial turf. Opponents are concerned about exposure to hazardous chemicals leaching from the crumb rubber cushioning fill made of recycled tires, the plastic carpet, and other synthetic components. Numerous studies have shown that chemicals identified in artificial turf, including polycyclic aromatic hydrocarbons (PAHs), phthalates, and per- and polyfluoroalkyl substances (PFAS), are known carcinogens, neurotoxicants, mutagens, and endocrine disruptors. However, few studies have looked directly at health outcomes of exposure to these chemicals in the context of artificial turf. Ecotoxicology studies in invertebrates exposed to crumb rubber have identified risks to organisms whose habitats have been contaminated by artificial turf. Chicken eggs injected with crumb rubber leachate also showed impaired development and endocrine disruption. The only human epidemiology studies conducted related to artificial turf have been highly limited in design, focusing on cancer incidence. In addition, government agencies have begun their own risk assessment studies to aid community decisions."

Besides serious chemical toxicities, synthetic turf has been documented to reach temperatures over 200°F on a 98°F day. Synthetic turf fields are always significantly hotter than natural grass, concrete or asphalt. These higher temperatures put users of turf at risk for skin burns and heat-related illness.

I might note that obvious issues such as this should be spotted or anticipated by City staff and not find their way into a DEIR produced by professional consultants.

Additionally the auto tires used in artifical turf are now widely known to be deadly toxic to trout and other salminoids. Therefore they should be employed anywhere close to Roseland Creek.

"When tires wear on pavement, the chemical 6PPD is released. It reacts with ozone to become a different chemical, 6PPD-q, which can be extremely toxic — so much so that it has been linked to repeated fish kills." This caveat equally applies to tires used in artifiicial turf.

See the following analysis on the internet by the San Francisco Estuary Institute and The Aquatic Science Institute: "Vehicle Tires Threaten Water Quality." https://www.sfei.org/news/vehicle-tires-threaten-water-quality

> **Response K.6:** The Artificial Turf Alternative was included in the Draft EIR (page 161) in order to provide a reasonable range of alternatives for the City's

consideration. This alternative was intended to reduce water use on the project site. The City acknowledges the commenter's identification of additional considerations related to the use of artificial turf. The Artificial Turf Alternative was not found to be environmentally superior to the proposed Master Plan.

Comment K.7: Dog Park

Neighbors have repeatedly declared that they do not support a dog area in this park. This is because those close to the park need to sleep at night and dog parks are notorious for a lot of loud barking and commotion throughout the day and into the night. Witness the uproar caused several years at the park "A Place to Play" by neighbors.

The park is also a place where turkeys nest and where a variety of mammals live and enjoy the woodland quiet. Dogs and wild animals do not easily coexist. School children already use this park for nature studies and they enjoy the chance to see squirrels, sometimes rabbits and birds. The introduction of a dog park defeats all of the valuable natural services that the park seeks to provide.

This proposal would cause neighbors to rise up in uproar over the insensitivity of this concept.

Response K.7: The proposed Master Plan does not include a dog park. The commenter's opposition to the Active Use Master Plan Alternative that included a dog park is acknowledged.

Comment K.8: Roseland Creek.

The isues of the creek are not addressed in the present DEIR, yet this is perhaps the biggest issue in the park. The fact that the creek and its many issues and influences are not considered makes this DEIR inadequate as an assessment of the issues of Roseland Creek Park. It should be clear to even the most casual visitor that everything in this park is influenced by the creek which runs down through the very center of the park.

Over seventy years ago, according to old time neighbors, such as Felix and Florence Kemp (1027 McMinn Avenue) steelhead trout used to come up Roseland Creek from the Sebastopol Laguna. This resulted in small rainbow trout fry occasionally being caught by neighborhood youth. At that time ground water levels were higher and certainly cleaner. Our groundwater was clean to drink and supposedly sweet tasting.

Since that time there has been massive ground water overdrafting, particularly by the City of Santa Rosa all across the Santa Rosa plain, and now also by Chelsea Gardens apartments, managed by Burbank Housing – right across the street from the park. As groundwater levels have dropped, by estimate over two perhaps three feet, Roseland Creek has suffered dewatering and now only flows in the winter and early spring months. (Previously this Roseland creek flowed year round).

As evidence of the impact of this decline in ground water, the black walnut trees that Mr Kemp grew at 1027 McMinn Avenue and also his English walnut trees were formerly self sufficient with ground water. Now that the ground water is dropping all of his English walnut trees have died and the black walnet trees, with deeper roots are all stressed.

This declining groundwater level also jeopardizes the California Tiger Salamander (CTS) and all other wildlife and plant life along the riparian corridor by having caused a dessication of the land and grounds. This decline still continues into the present. For the sake of future water sustainablity, this overdrafting of groundwater should stop immediately as it will continue to cause a deeper dewatering and consequent further dessication and drying of the land and dependent vegetation.

Additionally the City of Santa Rosa, in an apparent effort to speed rain runoff, channelization efforts took place in the past. This seems to have been an effort to straighten out the creek banks, and this included an attempt to pave the creek channel. Now with the onset of global climate change and the prediction of more episodes of torrential rainfall, this will cause more flooding, both in the park and to neighboring residences. The consequence of these misguided "corrections," the creek now has a reduced capacity to handle large storms. Now every year, and the Water dept. can verify this, we have flooding over the top of the bridge on McMinn Avenue. It is probable that this flooding will cause damages to neighhood housing and this will be known as the result of City manipulation of the creek without awareness of the consequences of this bad management.

The present annual flooding is amplified by the covering of most surface areas by impermeable materials. This now causes excess runoff and in the future it is inevitable that it will cause the sewer system to be overwhelmed causing overflow that is the direct result of iatrogenic city planning and the wrongheaded manipulation of the creek. This is an important issue that begs for correction.

> **Response K.8:** As described in Section 3.10 Hydrology and Water Quality, groundwater within the Santa Rosa Plain Subbasin is managed by the Groundwater Sustainability Plan that seeks to address many of the commenter's concerns related to groundwater overdraft. The project site is not located within an area designated by the Santa Rosa Plain Groundwater Sustainability Plan as a major natural recharge area. The City has a Citywide Creek Master Plan that guides the restoration of creeks throughout the City. The Recreation and Parks Department does not typically incorporate creek restoration into park projects. The City's Transportation and Public Works Department plans and implements creek restoration projects as funding becomes available. Future creek restoration for Roseland Creek may be completed as a separate project in the future as funding allows.
>
> The conservation easements on the site limited the northerly two parcels to five percent impervious surface and the southernmost parcel to 20 percent impervious surface. Additionally, the project will adhere to the Phase I MS4 Permit to limit the amount of runoff from the site. Given the limited amount of impervious surfaces proposed on the site, the project will not cause excess runoff from the site.

Comment K.9: Another major water issue in this area is the pollution of ground water by gasoline, benzene and trichloroethylene. This happened because the City of Santa Rosa failed to enforce regulations on the auto and dry cleaning businesses who dumped toxic cleaning and other waste materials onto the ground and steadily polluted what was peviously pristine clean ground water.

The different issues listed here reflect the burden that local residents endure because of the failure of the City of Santa Rosa to follow sound science and perform due dilegence in stewarding the lands and the issues of quality of life for the citizens of Santa Rosa.

> **Response K.9:** Section 3.9 of the Draft EIR (page 85), identifies existing sources of contamination in the Roseland area of Santa Rosa. The project site is located an adequate distance from the identified sources of contamination to not be impacted by those sources. Additionally, the project site is not located in any regulatory agency records or databases identifying hazardous materials contamination.

Comment K.10: The Environmentally Superior Alternative

> See: "The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. As described in Section 7.0 Alternatives, the environmentally superior alternative to the proposed project is the No Project Alternative because all of the project's significant environmental impacts would be avoided."

There is something quite positive in this concept. The environmentally superior alternative could be understood to let nature have her way. Over the last two or three years none of the planned development to the park has taken place. Yet, another form of growth has taken place. Wildflowers have exploded in variety and number. Trees have grown in stature and made the park more beautiful and thickly green. The grasses and shrubs are thicker and of a broader variety.

Some animal species have grown in number and a few have strangely disappeared. Now as evening comes over the park, the deep sounds of the Great Horned Owl's hoots float across the forest. Now the rats that once might be found are more cautious even as the owls have grown fat and strong. Turkeys have become abundant, particularly in the central area and so have rabbits and even skunks, particularly in areas not well trod. Strangely the raccoons and possums have disappeared. It is actually all quite beautiful with luxurious plant growth. Neighbors simply walking arrive at many times during the morning and even visitors from outside the area. Every morning hikers tour through the park, many of them students with their parents cut across the park en route to classes. And there are also the occasional homeless adventurers and the indigents.

Could this be the "environmentally superior" alternative which the authors of this DEIR refer to? Probably not but this still remains a nice thought that would still benefit many of our neighbors who are regularly seen strolling through this nature park.

> **Response K.10:** The commenter's preference for the No Project Alternative is acknowledged.

L. Fred Krueger (dated June 14, 2024)

Comment L.1: Thank you for your note indicating that you received my first set of comments. I ran out of time with that first edition and here are further insights that I did not have time to include. Here are a few additional comments on the Roseland Creek Park draft Environmental Impact Report for reflection and commentary.

The Potential for Fires

The Roseland Creek park grounds over the past two or three years have witnessed remarkable growth in its trees, brush and grasslands. This is a welcome development because the increased biomass density brings a stronger natural presence to the area. To protect this growth, there needs to be intentionality in ensuring fires do not erupt.

A 2023 study from Cal Fire on the causes of fires shows that 95+% of fires are due to human accidents, particularly vehicle sparks, smoking, cooking and electrical equipment. Statewide the remaining fires are due to fork lightning or rarely arson. Fork lightning is rare in the Santa Rosa region as we typically have sheet lightning in our coastal region.

Over the past ten years this woodland area has witnessed several fires, every one of which comes from cooking, smoking or some other illegal activity. This means we need to be very careful of picnicing in the park as this is potentially hazardous.

Similarly, smoking needs to be prohibited in the park. It is just too dangerous even though many of the homeless who frequent the park are smokers. So is driving over the dry grass by vehicles as mufflers can ignite fires. All vehicles in the park should stay on designated roadways, or they too can be a cause of fires.

> **Response L.1:** As described in Response I.8, over the last five years, the Fire Department has responded to several fires on the project site. Two of the fires were started by individuals for warming and cooking, were not left unattended, and were extinguished at the direction of the Fire Department. The proposed Master Plan includes picnic areas and BBQs in the active use areas south of Roseland Creek. The City has found providing BBQs and ash containers increases safety at park sites and can avoid park users bringing their own.
>
> Based on the Municipal Code, smoking in parks and recreational areas may be allowed in designated smoking areas as authorized by the City Manager. The commenter's suggestion that smoking be prohibited in the park is acknowledged.
>
> The proposed Master Plan provides adequate emergency vehicle and maintenance vehicle access on paved and unpaved routes to assist in fire prevention.

Comment L.2: Roseland Creek

The history of this creek from free flowing year round to a dry streambed over half of the year reflects on the continual overdrafting of ground water. Streams and ground water constitute one body of water, manifesting in different formats.

The biggest cause of overdrafting is the City of Santa rosa, followed by the local vineyards, then local lawn watering such as that by Chelsea Gardens on McMinn Avenue and other properties managed by Burbank Housing.

Roseland Creek influences much of the area in the proposed park area. Fortunately a former employee of the City of Santa Rosa, Rhianna Frank has developed a Masters degree report while at the University of San Francisco with a focus on groundwater on the Santa Rosa Plain. See "Sustainably Managing Groundwater - Surface Water Interactions within the Santa Rosa Plain Basin," by Rhianna Frank, Fall 12-14-2018, https://repository.usfca.edu/cgi/viewcontent.cgi?article=1976&context=capstone

Rhianna quotes Senate Bill 1319 (2014): Senate Bill 1319, introduced by Fran Pavley that requires local agencies to adopt and implement a groundwater management plans (State of California, 2014). The plan must contain specific components that meet state defined sustainability objectives tailored for the basin within the SGMA timeframe. She also observes how "Overdraft caused by groundwater pumping results in surface water depletion for seventy-five percent of California's rivers and streams" (5.1).

She observes how depletion of groundwater levels is the root cause of lowered groundwater levels, reduction of groundwater storage, water quality degradation, land subsidence, and in some cases the depletion of interconnected streams and seawater intrusion. Most of us in the Roseland area already see the effects of surface subsidence in the cracking of house foundations. Repair is expensive. The draft EIR did not examine these issues in preparing its report. Yet this increasing dessication will dry the trees and plants in this park and cause other consequences of drying, not examined in the DEIR.

This is another area where the present DEIR is inadequate.

She also points out the following about the root depth of plants in an area:

> Root depth of groundwater dependent vegetation provides necessary evidence in determining if the ecosystem is impacted by depleted groundwater resources. Each type of vegetation has a measurable root length average which sets a minimum threshold for groundwater levels. For example, if a specific groundwater dependent plant has historically grown in the area and is known to have a maximum root length of fifteen feet then this species of plant will begin to exhibit signs of impact: reduced growth, reduced reproduction and increased mortality— if the groundwater levels exceed fifteen feet below the surface. Root depth data should be established locally since there are regional differences that can have varying effects on root length. Studies need to be conducted within the Santa Rosa Plain Basin to determine the maximum root length of the groundwater dependent vegetative species with the shortest expected root length. This information is critical in determining the minimum threshold for this criterion. Figure 20 is a flow chart of the range of changes in plant physiology, ecophysiology and ecology that is associated with various durations of water stress (Eamus et al. 2016).

Neighbors already know that groundwater levels in Roseland are dropping. Some of the trees in Roseland Creek park depend on that groundwater to survive. How much of an issue this might be will require some study, but this issue was never addressed in the DEIR.

> **Response L.2:** The potential for the project to impact groundwater is discussed in Section 3.10 Hydrology and Water Quality of the EIR. Refer also to Response K.8.

Comment L.3: The Forest woodland

Generally, the quality of the park will be maintained to the degree that we are able to preserve and protect all of the trees. The trees are the key to maintaining the ambience of the park. Over the past three years while plans were delayed, a wonderful period of growth in the neighborhood forest took place. The effect of the forest for the neighborhood is one that is cooling, quieting of city sounds, peace-making, all while silently sequestering carbon dioxide as it partially counteracts the effect of fossil fuels on the City's carbon debt.

Response L.3: Refer to Response K.2.

Comment L.4: Noise and Crime Abatement through the park

It is well known that noise pollution can cause health problems for people and animals. From traffic noise to music concerts, loud or inescapable sounds can cause hearing loss, stress, anger and even heightened blood pressure levels. In contrast quiet in a neighborhood park or spending time in quiet places helps calm the mind and reduce the unhealthy effects of these noise intrusions.

The Roseland area is recognized by the SR Police dept as a place with considerable gang activity. However, strong evidence exists that high-quality green spaces in residential environments are important for public health promotion. This is because both availability and quality of green spaces has positive and significant associations with park use. Quiet in the park will be important for its benefits to flourish. This should mean the prohibition of artificial methods of sound amplification and noisy events.

The National Library of Medicine (NIM) provides important findings about quiet nature parks as a means for crime abatement. This analysis provides important documentation of the value of a nature park as opposed to a play park. When the Roseland neighbors learned this fact early in our research around 2002, this helped us determine the type of park we wanted. This was decisive information for neighbors:

> See these findings at: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6950486/
>
> 'The Impact of Green Space on Violent Crime in Urban Environments: An Evidence Synthesis"
>
> Can the presence of green space in urban environments reduce the frequency of violent crime?
>
> To ascertain the evidence on this topic, we [NLM) conducted an in-depth literature review.... More than 30,000 potential paper titles were identified and ultimately, 45 papers were selected for inclusion. Green spaces typically comprised tree cover, parks and ground cover. Criminal behaviors typically included murder, assault, and theft. The majority of the research reviewed involved quantitative methods (e.g., comparison of green space area to crime data). We extracted multiple mechanisms from the literature that may account for the impact of green space on crime including social interaction and recreation, community perception, biophilic stress reduction, climate modulation, and spaces expressing territorial definition.

> Recommendations are made for future research, such as meta-analysis of existing data and the development of grounded theory through qualitative data-gathering methods.
>
> By providing evidence that access to nature has a mitigating impact on violence in urban settings, city governments and communities are empowered to support these interventions....
>
> The positive impact of nature and green space on human health and well-being has been documented by over 100 studies, including several literature reviews and meta-analyses which have examined the benefits of the nature connection. Several researchers have begun to explore the relationship between nature and urban crime, focusing on outcomes such as reduced aggression and improved community cohesion. Multiple new papers and dissertations have been published in the last three years, and an expansive update is essential to setting future research agenda.

It is now well over twenty years since the neighborhood associations in Roseland realized the great benefits of a nature park over other forms of parks. Former SR Parks and Rec. director Mark Richardson realized these benefits and supported the goal of a nature park, which was originally characterized as an urban wilderness park. After the 2009 budget shortfall a change in management took place, and then without institutional memory within the Parks and Recreation Dept. Roseland, neighbors had to defend their goal of a nature park with newsletters to local residents and dialogues with the new generation of SR Park and Rec. staff.

> **Response L.4:** The proposed Master Plan includes active use areas south of Roseland Creek and a focus on passive recreational uses north of the creek. No formal event spaces supporting amplified music are planned for the project site. Refer to Response I.11.

Comment L.5: Other Issues

There is a tendency among local residents to dump trash onto the park grounds. Penalties should be established to end this tendency.

Students use the park daily as a thoroughfare to the school on Burbank Avenue. They frequently drop plastic wrappers and other non-recyclable materials along the pathway. Trash recepticles are needed to maintain a clean and trash free park. Also education about the importance of a litter free environment.

A tendency also exists for the homeless to seek campsites in the park whenever locations along the Joe Rodota Trail become closed. The reason is that the park is a beautiful location, and no restrictions exist to suppress drug use, late night parties, campfires or other activities. Trash is a typical result of their presence in the park area, as well as drug paraphenalia, liquor bottles and worse. The solution should be to have an evening sweep to remove campers daily. The sign by itself is not sufficient as the signs tend to be ignored.

> **Response L.5:** The proposed park will include trash receptacles to reduce the potential for littering within the park property. In the event illegal activity is observed

on the park property, residents are encouraged to contact law enforcement. City policy related to unhoused populations will be enforced on the project site.

Comment L.6: Vehicles

Cars and trucks occasionally drive onto the grounds as there are no longer any hinderance to their entry onto the grounds. Vehicles bring camping gear, cooking equipment, chairs and wide variety of other forms of trash. The Park grounds need some form of security against vehicle entry. The previous chain provided some protection and that should be reinstalled. The prohibition should exclude cars and trucks, electric bikes and scooters; bicycles should use established paths. All of these pathways should be with permeable surfaces to maximize groundwater absorption.

It is quitting time for me, so I will conclude this second set of comments at this point. Thank you for considering these issues in plans for the Roseland Creek Park.

Response L.6: The City previously installed a chain to restrict access to 1370 Burbank Avenue and has replaced the chain when it becomes aware of any vandalism. The proposed parking lots for the park will include vehicular gates to restrict access to the site overnight. The project proposes the use of permeable pavement except where necessary to comply with Fire Code and ADA requirements.

M. Fred Krueger (dated June 17, 2024)

Comment M.1: One last set of notes on the Roseland Creek Park draft Environmental Impact Report. This will address issues not previously elaborated upon in previous commentary.

The ecosystem within the park includes an opportunity to showcase as aspect of what the original natural flora and fauna looked like prior to the arrival of Europeans in this area inside the City. After several years of growth and untouched natural development, the park land has increasingly become a beautiful area of wildflowers and lush grassland, second growth oaks and other trees, and especially small animals and native birds.

Children who visit the park and students delight in seeing the squirrels, rabbits, and turkeys which are abundant. An attempt should be made to manage the area as a whole ecosystem, making efforts to protect the animal population. There are also occasional raccoons, possums, skunks and arboreal salamanders and a few snakes. Once in awhile a deer can be found in the park, and increasingly visitors are arriving at dusk to hear the great horned owls who live in the tall trees in the central area of the park.

To maintain a park with an abundance of wildlife, artificial noise levels have to be kept at a minimal level. Animals and loud noise are not compatible. The same is true about noise for most humans.

Response M.1: Refer to Response L.4.

Comment M.2: The field of nature therapy is still in its infancy, yet according to WebMD, Nature therapy, also called ecotherapy, is the practice of being in nature to boost growth and healing, especially mental health. More and more research suggests that spending time in natural

environments is linked to a variety of mental health benefits. For example, being in a green space has been linked to less anxiety, fewer depression symptoms, and lower stress levels. Spending time in nature helps people with depression and kids with attention problems think more clearly.

"One of the top benefits that we address are for people who are trying to reduce anxiety or depression and increase relationship and connection," Dr. Lung says. "I also think it's super engaging, so for kids and teenagers ... [and] for people who are reluctant to be in therapy."

Patricia Hasbach, PhD, a licensed professional counselor and clinical psychotherapist, is another expert in ecotherapy. She recalls one such person, a patient in a cardiac rehabilitation center, who was reluctant about therapy. "He was pretty nervous about talking with me and I suggested, 'You want to just take a walk outside?' And I just noticed how his voice changed," Hasbach says. "He become more relaxed ... and that was my first 'aha' moment that there's something here that I need to pay attention to."

Researchers have studied nature's healing list a number of benefits, including:

- ADHD
- Dementia
- Lessened pain
- Lowered stress
- Medical recovery
- Mood modification
- Obesity
- PTSD

The DEIR does not engage these possible benefits to the Roseland Creek Park, and yet this region of Santa Rosa contains a lot of wounded young people who would benefit far more from the benefits of clean nature than simple athletics or pedestrial entertainment. These benefits should be considered just as much as traditional forms of park use. Here is an opportunity to help pioneer a benefit to urban young people that is just now coming into wider realization by the medical community and park management leaders.

As a leading psychologist observes, "[It's about] noticing what's around you and increasing our own awareness of ourselves in relation to our world and environment," she says. "Just the symbiotic benefits of being outside."

> **Response M.2:** CEQA requires the Lead Agency to analyze the physical effects of the project on the environment. The proposed Master Plan was developed based on extensive community engagement and provides a variety of amenities to meet the recreational needs of the public.

N. Gemma Villasenor (June 10, 2024)

Comment N.1: My family and I live just right down the street from the proposed site. I believe that while a park is a nice idea, unfortunately the way things are going it would just be a waste of money

because the population it is designated for are not able to use it due to the drugged homeless population that roams the streets. In addition, there is another park right down the street off of Hearn and there is A LOT of traffic as well as a big group of people who are there at all hours just day drinking or smoking marijuana. I think the land should just be preserved as is. Additional apartments would also cause more traffic than there is in the morning and in the afternoon with everyone commuting to and from the schools in the area. I think having a nice area to just roam in nature and observe is more essential for children.

> **Response N.1:** To the extent illegal activity is observed in the community or on the park property, residents are encouraged to contact law enforcement. The proposed Master Plan includes a trail network to allow park visitors to commune with the natural environment on the site. The proposed Master Plan is the result of input from a variety of stakeholders and seeks to balance the desire of the community to maintain the majority of the park in its current state while allowing for active recreation within a limited area of the park south of Roseland Creek. Refer to Response C.3.

O. Gerald Rickard (dated May 13, 2024)

Comment O.1: Just call this park the neighborhood WOOD or WOODS.

Take two out of three saplings bunch together and open up the space a little

Ask a tree company to donate eucalyptus or bay tree chips as they smell nice and last a long time

Put them on the path

Take out the curb on McMinn so I can ride my bike in there without stopping to lift it over the curb.

Strategically locate six heavy duty picnic tables made out of wood, not cement.

> **Response O.1:** The project proposes to minimize the removal of trees on the site as described in the EIR. The project proposes the use of permeable pavement except where necessary to comply with Fire Code and ADA requirements. The project will include curb cuts as necessary to meet ADA requirements and provide access to the multi-use trail. Picnic areas are proposed on the project site, however, the materials that will be used for picnic tables has not yet been determined. The commenter's suggestions for the park are acknowledged.

P. Hunter Scott (dated June 9, 2024)

Comment P.1: I would like to submit my support of the City's plan for the Roseland Community Park. As a resident of the McMinn neighborhood, I'd urge the city to move forward with the current plan or any of the alternatives, except for the "no project" alternative, that will result in no further delays to building the park. I'd like to also submit my opposition to the "no project" alternative, given the findings and comprehensive mitigation plans proposed in the recently released Draft EIR. The community will benefit greatly from a neighborhood park, especially one as well designed as what

can be found in the City's plan. People in the neighborhood already use the space as an "unofficial" park. Without amenities that would come with a park such as trashcans, restrooms, parking spaces, and paved paths to support and manage activities that are already happening, the area will continue to accumulate trash and become degraded. The "no project" alternative will result in more environmental harm, not less, and further delays will also not serve the neighborhood well. Please move forward quickly with constructing this park, with whichever alternative will make it happen most quickly.

> **Response P.1:** The City acknowledges the commenter's request that the proposed Master Plan be approved and constructed as quickly as possible. This comment does not raise any questions regarding the adequacy of the EIR, therefore, no further response is provided.

Q. Jennifer Deihl (dated June 3, 2024)

Comment Q.1: My name is Jennifer Deihl. I'm a homeowner on Rose Meadow Ct in Roseland. I'm also a mother of a nature loving toddler, an avid hiker, cyclist and an owner of a big dog who loves long walks. I used to load up the boys, stroller etc and head to one of the regional parks to get our fix of exercise in nature. About a year ago after strolling through the residential areas surrounding us; we discovered the Roseland and Colgan creek trails! I actually obtained a neat map at an event held for the community at Bayer Farm. While we're right by Bayer Farm, and as much as we treasure it, it doesn't offer the same experience for large dog owners and those looking to be immersed in nature while getting a long walk in. Being able to escape the busyness of development and hear birds and animals in their natural habitats was a game changer. We now regularly; at the very least once a week, make a minimum of a 3 mile loop through these areas by foot or bicycle. This morning, I met a kind neighbor who brought to my attention the approaching decision on whether or not to clear the area to make a soccer field. It motivated me to reach out and plead for the preservation of this special wildlife area. It is so dear to us. With the existing schools, and southtwest park being nearby, I think this undeveloped area is so necessary to protect. In an area so prone to gang activity its crucial to have an area that feels like Sonoma county in all its greatness accessible to my son and growing family. Thank you for reading and I wish to stay informed of further public decisions in my area.

> **Response Q.1:** Although the proposed Master Plan includes a large lawn area in the active use areas of the park, it is intended for informal use and no soccer fields are proposed. The project will continue to provide a network of trails throughout the site to allow residents to enjoy the natural areas of the park. This comment does not raise any questions regarding the adequacy of the EIR, therefore, no further response is provided.

R. John Murray (dated June 10, 2024)

Comment R.1: Thanks for the opportunity to share some of my thoughts one more time. Being a long time construction guy, I respect the park's design and process getting to this point, and how thorough this EIR is. I'm sure it will also be a tricky build.

I'd like to first comment on proposed work hours stated in MM NOI-1.1. These work hours should not be 7 days a week, but rather, 5 days with weekends and dinner time & later, off. There's a couple

schools across the street, and it's surrounded by neighborhoods. Work hours affecting the project should be agreed upon rather than just stated.

> **Response R.1:** Construction hours on the site will be limited to daytime hours to avoid impacts to adjacent uses. The construction noise mitigation plan will also identify a disturbance coordinator to respond to complaints and implement reasonable measures to correct any issues. The construction noise mitigation plan may also consider additional limitations on construction noise hours, as needed. The commenter's request for more limited construction hours is acknowledged.

Comment R.2: Regarding the Project Alternatives, I've voiced my opinion many times over the last 20ish years. My first choice is the No Project Alternative. It doesn't mess with what is already a pretty good thing.

As a second choice, I'd prefer the Neighborwood Master Project Alternative, but with a grassy spot south of the creek for families and visitors to run around in.

> **Response R.2:** The commenter's preference for the No Project Alternative or a modified Neighborwood Master Plan Alternative is acknowledged.

Comment R.3: The city's proposed and approved master plan, 2.2-4, still has some key flaws, and I'll comment below, loosely following the order of the draft as written.

2.2.2.1. I respect the design of the parking lots being shoehorned into the trees and the creeks buffer zone. But why wouldn't some simple street parking be chewed into the park across from the elementary school's parking lots? It would be what I assume is a city standard such as what they did at Burbank Ave & Liana Dr a few years ago, making a simple parking lane. And, why not city standard curb and gutter and sidewalks @ the entire perimeter? The scenic road designation has already been violated by the schools and the multi family builds occurring now down the block.

> **Response R.3:** The City completed extensive community outreach to develop the proposed Master Plan. Based on community input, the proposed Master Plan seeks to maintain the natural areas and rural character of the site. Additionally, the Roseland Area/Sebastopol Road Specific Plan includes a street design for the majority of the Burbank Avenue site frontage with bioswales adjacent to the roadway and no street parking, as requested by the community. The Master Plan, therefore, does not propose to provide standard curb and gutter along the project street frontages.

Comment R.4: Regarding the amount of paving or concrete to occur in the park, I get it that it's required for ADA paths of travel and parking, and called out as the yellow dotted 'multi use trail', however let's please not pave 'roads' throughout the remainder of the park. The 'network of smaller trails & walkways' should be compacted permeable gravel, and minimalistic at 4 or 5' wide, based on my personal municipal building experiences. The goal is to not disturb the nature as much as possible it would seem. A shady walk or jog in the trees or grasses.

> **Response R.4:** All proposed parking areas, walkways, and trails will be constructed with permeable pavement, except for areas where extra support is needed for ADA

compliance. The City plans to limit impervious surfaces on the site consistent with the existing conservation easements.

Comment R.5: 2.2.2.2 I have some HUGE issues with the plan for the south of the creek: the small 2nd restroom and barbecues! This area is designated per 3.0-2 as 'within the wildfire hazard zone'. Therefore, no fires!

Response R.5: As discussed in Draft EIR Section 3.20 (page 141), the project site is not located in a state designated Fire Hazard Severity Zone or in the City's Wildland Urban Interface Fire Area. The proposed Master Plan includes BBQs as the City has found providing BBQs and ash containers increases safety at park sites and can avoid park users bringing their own.

Comment R.6: That restroom tucked back 3 or 400 yards away from the road's prying eyes, and behind the heritage trees, spells nothing but trouble to me. I can't imagine anything but dilapidated motor homes populating that tucked away parking lot. And the school kids will be trying to enjoy that area as well. Oh boy.

A solution would be to down size to only the nature center restrooms, perhaps with a couple more stalls added if required. Plenty of visibility there. The picnic areas could be connected to it via another ADA upgrade path of travel over the bridge. There are certainly parking management issues ahead.

Response R.6: The proposed parking lots for the park will include vehicular gates to restrict access to the site to daytime hours. The proposed Master Plan includes restrooms south of Roseland Creek to provide access to the park for users of all ages.

Comment R.7: Figure 2.2-3 is 6 years outdated. Google maps currently shows the reason why gridlock on Burbank Ave has become so horrible. Another school, and more high density development. Table 3.0-1 also helps point out the hundreds of new homes just within walking distance, not to mention the thousands other homes listed in the city's "Santa Rosa's Affordable Project Pipeline". I feel this EIR should also address Burbank Ave's gridlock, especially at school drop off and pickup times. No one will be able to drive to, or exit from this park when it's those times. Sebastopol Rd, Hearn Ave, Dutton Ave all have this same gridlock issue, although it's not all attributed to schools. I'm having a hard time wrapping my head around all the greenhouse gas emissions, or the PG&E power plant's emissions needed to power all the electric cars, all idling away in the name of affordable housing. And there's no infrastructure upgrade been done to accommodate the thousands of new dwellings. Yes, Sonoma Clean Power is all renewable energy as is mentioned later in this report.

Response R.7: Figure 2.2-3 has been updated to reflect recent development in the vicinity of the project site. Delay caused by traffic congestion is no longer considered an impact under CEQA. Transportation impacts from vehicle use are considered for a project's potential to increase vehicle miles traveled (VMT). As discussed in Section 3.17, the City's VMT guidelines do not consider public facilities, such as a park, to significantly impact VMT. As noted in the comment and described in the Draft EIR (page 82), City facilities rely on 100 percent renewable energy from local sources

through Sonoma Clean Power. The project, therefore, will not result in a cumulatively considerable contribution to greenhouse gas emissions.

Comment R.8: 2.4 So much of the creek's bottom in the park is concrete, as well as concrete walls. Didn't the Sonoma County Water Agency approve that in the past? Could not Sonoma Water bear some responsibility now for its removal and possibly flooding. There's a huge flooding problem here, as McMinn Ave is typically flooded and impassable at the creek at least a few times per year. The city had its survey crew in the neighborhood for about 3 weeks mapping and checking elevations this spring. The creek flows better behind the Roseland School District offices, once it becomes channelized.

Response R.8: The proposed project focuses on recreational improvements and amenities and will not modify the bed or banks of Roseland Creek. The City has a Citywide Creek Master Plan that guides their restoration of creeks throughout the City. The Recreation and Parks Department does not typically incorporate creek restoration into park projects. The City's Transportation and Public Works Department plans and implements creek restoration projects as funding becomes available. Future creek restoration for Roseland Creek may be completed as a separate project in the future as funding allows.

Comment R.9: Impact AES-2 I've stated earlier my thoughts regarding the hidden restroom and its attached parking lot. I'd like to see more heritage trees remain, and street parking used instead. Access south of creek from over the bridges. School parking lots are empty on the weekends and after hours also.

Impact AES-4 Lighting shouldn't be required in a dawn to dark only locked park. If necessary, only at the nature center structure for a drive by security check.

Response R.9: The project will result in a limited amount of tree removal as described in the Draft EIR (page 21). The City completed extensive community outreach to develop the proposed Master Plan and incorporated parking and restrooms south of the creek based on community input. As discussed in the Draft EIR (page 22), nighttime safety lighting for structures and, as necessary along trails, will be included for security consistent with City standards.

Comment R.10: Finally, my children and now grandchildren have played in that park for 39 years, just as it is. I've walked my dogs there for even longer. The school kids and walkers and dog walkers all make the park a lively and social experience. Along with the others who live close enough to the park to walk there, we've cleaned and monitored and enjoyed it for many years. Hoping for a sensible park build.

Response R.10: This comment is acknowledged and does not raise any questions regarding the adequacy of the EIR, therefore, no further response is provided.

S. Jorge Inocencio (dated June 17, 2024)

Comment S.1: I am writing to provide feedback on the draft environmental impact report for the Roseland Creek Community Park. I am in favor of the City's proposed master plan and I think that the DEIR does a very thorough job of describing and offering mitigations for any potential environmental impact. I think that the DEIR addressess all of the concerns from the community regarding environmental preservation.

> **Response S.1:** This comment is acknowledged and does not raise any issues regarding the adequacy of the EIR, therefore, no further response is provided.

T. Judy Johnson (dated June 15, 2024)

Comment T.1: Please consider changes to the City's plans for Roseland Creek Community Park that will focus on the land and its life. I refer to the letters and comments from Janet Cobb of the California Wildlife Foundation, Angela Moskow of the California Oaks Program, and Trish Tatarian of the California Native Plant Society. I am not a professional or scientist, just a human being who lives here and very much cares about our land, as do many Santa Rosa residents.

The Park must not be a profit center, event venue or recreational park. This is a struggling remainder of the very special habitat that was the Santa Rosa plain and laguna. All that is needed is to help reverse the human damage and provide a healthy, peaceful area for people to walk, be calmed and refreshed, and connect with nature.

How fortunate this is near schools, where kids can discover, enjoy and learn to protect habitat. The next generations are becoming acutely aware of the importance of and the destruction of nature. Many are losing hope. This park, in their own neighborhood, can provide a positive and dynamic early step in caring for Earth. They don't need a "nature mall". All that is needed is minimal paths and some benches. It should be eyes on, not hands on.

The Santa Rosans living near Roseland Creek Park vary. Some cannot easily access or afford the time to visit the larger parks in the area. Some came to this County and this City to be near the special environment. Some have no clue what the indigenous land was like. Many want a respite from the endless noise, buildings and concrete, if only for a little while. And they don't need a "nature mall", either. So no parking lots, kiosks, BBQ pits, picnic areas, playing fields…. The non-human creatures also need quiet and privacy to flourish in their home.

Of course, work needs to be done on the plot. Get rid of the old pavings and foundations. Don't add more paving. There is plenty of street parking for those coming any distance. Get the garbage out, garbage and recycle bins in. The woods and grasslands need invasives removed and native species reintroduced. Some trimming is needed, but no logging, and no landscape architects need apply. Once repaired, there is no need for roads. It is a small area. Can it please be a quiet, healthy part of the plain to be visited and appreciated? We will help.

Please act responsibly for the long term. The days of "someone else will take care of it" must be over. Here is your opportunity to be an example.

Thank you for allowing me to have my say.

> **Response T.1:** Responses to comments provided by the California Wildlife Foundation and California Native Plant Society are provided in Responses D through F, above. The commenter's opposition to providing a nature center, active park uses south of Roseland Creek, and parking is acknowledged. The project will remove invasive species in areas of the site proposed for recreational improvements and will work with community groups to plant native species on site. The project proposes limited tree removal as described in the Draft EIR (page 55). This comment is acknowledged and does not raise any issues regarding the adequacy of the EIR, therefore, no further response is provided.

U. Lynn Houser (dated June 15, 2024)

Comment U.1: I am a resident of Santa Rosa for over 26 years who appreciates the value of our beautiful parks, open space, and connection to nature as a parent of two grown children. I have walked the 20 acre parcel to be Roseland Creek Community Park and strongly support this land to be protected in its natural state with restoration of priority areas to allow native plants, wildlife, and people to thrive.

I believe a unique approach is needed to provide the great benefits to residents of Roseland, the general public, the plants and wildlife who live there as well as ecological services such as groundwater recharge. The northern meadow, juvenile Valley Oak woodland, Roseland Creek, and the Purple Needlegrass area in the south need to be addressed specifically to preserve and protect their value as well as comply with CEQA and the City of Santa Rosa Creek Master Plan.

> **Response U.1:** The proposed Master Plan involves trail improvements throughout the northern parcels of the park site as shown in Draft EIR Figure 2.2-4 (page 9). The proposed trail improvements will also encircle the purple needlegrass area on the southernmost park parcel. The proposed project does not include any modifications to Roseland Creek. Future improvements to Roseland Creek will be completed consistent with the Citywide Creek Master Plan by the Transportation and Public Works Department as funding becomes available.

Comment U.2: The EIR is inadequate in addressing invasive species removal.

The Creek Master Plan identified many invasive species that need to be removed prior to creation of park amenities. These species include Himalayan blackberry (Rubus armeniacus), cherry plum (Prunus cerasifera), hawthorn (Crataegus monogyna), wooly cotoneaster (Cotoneaster pannosus), harding grass (Phalaris aquatica), Mediterranean barley (Hordeum marinum ssp. gussoneanum), reed fescue (Festuca arundinacea), ripgut brome (Bromus diandrus), slim oat (Avena barbata), French broom (Genista monspessulana), Indian teasel (Dipsacus sativus), hairy cat's ear (Hypochaeris radicata), Italian thistle (Carduus pycnocephalus ssp. pycnocephalus), periwinkle (Vinca major), fennel (Foeniculum vulgare), poison hemlock (Conium maculatum). The Roseland Creek southern part is severely impacted by harding grass dominance (Phalaris aquatica). This invasive weed is very pernicious and requires a comprehensive plan to eradicate, which will require long term monitoring.

With removal of invasive species, the native forbs, grasses and shrubs will be able to recolonize successfully. This should be specifically addressed in the EIR for all invasive species present.

> **Response U.2:** The City acknowledges the presence of a substantial number on invasive species on the project site. A comprehensive invasive species eradication program is not currently proposed in the Master Plan. The Recreation and Parks Department does not have a dedicated source of funding that will allow for implementation of such a program in addition to the regular maintenance required for the proposed park. The project, however, will remove invasive species in areas of the site proposed for recreational improvements and will work with community groups to plant native species on site.

Comment U.3: The EIR is inadequate in addressing the need for the restoration of Roseland Creek.

The removal of approximately 400 linear feet of concrete in the creek channel is necessary to comply with the Creek Master Plan. As a central part of the new Community Park, the concrete removal, invasive and other non-native plants, and restoration with native riparian plants grown locally, this part of Roseland creek can be safely enjoyed by the public while providing flood control and wildlife habitat. This restoration plan must be considered in the EIR. Restoration of the creek will provide habitat corridors, natural areas in the neighborhood that allow animals to move throughout areas and get much-needed habitat. A restoration plan should be included in the DEIR as part of the planning process.

The large, mature, valley oaks along Roseland creek, combined with the juvenile valley oak woodland provide a natural resource once commonly found in the Roseland area which is now severely reduced by development. To illustrate the habitat value and benefits of valley oaks (even without bears or deer present) I present the following:

" Valley oak trees are a keystone species - a species on which many other organisms in an ecosystem depend, such that if it were lost the ecosystem would change drastically. Valley oaks support approximately 300 animals, 1,100 plants, 370 fungi, and 5,000 insects and invertebrates. Bears, black-tailed deer, scrub jays, magpies, wood ducks, wild turkeys, quail, flickers and acorn woodpeckers all depend on oaks for food. Insects feed on the leaves, twigs, acorns, bark and wood of oak trees (which in turn are food sources for other larger critters.) Some animals depend on oaks to keep them safe from predators, while others use the branches, cavities, and bark itself as a home. Oaks continue to be useful to wildlife even after they die. Salamanders, worms, snails, termites and ants live in decomposing logs and help turn wood into humus, which enriches soil." Source: Napa County RCD https://naparcd.org/wp-content/uploads/2017/10/1-Introduction-to-Oak-Ecology.pdf

The EIR is inadequate in that it did not cite the 2014 Citywide Creek Master Plan (CCMP) Appendix C Roseland Creek Restoration Plan and state how the park Master Plan will incorporate the Restoration needs of Roseland Creek. The CCMP identifies the following: "Construct a self-maintaining channel with adequate bank-full dimensions to transport sediment, contain healthy riparian vegetation and convey the 100-year flood." This inadequacy should be addressed before construction of any Creekside amenities. The Roseland Creek Master plan cites the following Santa Rosa General Plan Policies: OSC-D-7 Rehabilitate existing channelized waterways, as feasible, to remove concrete linings and allow for a connection between the stream channel and the natural water

table. OSC-D-8 Restore channelized waterways to a more natural condition which allows for more natural hydraulic functioning, including development of meanders, pools, rifles, and other stream features. Restoration should also allow for growth of riparian vegetation which effectively stabilizes banks, screens pollutants from runoff entering the channel, enhances fisheries, and provides other opportunities for natural habitat restoration There is no discussion in the EIR that these policies will be implemented for this park.

Response U.3: The proposed project focuses on recreational improvements and amenities and will not modify the bed or banks of Roseland Creek. The City has a Citywide Creek Master Plan that guides their restoration of creeks throughout the City. The Recreation and Parks Department does not typically incorporate creek restoration into park projects. The City's Transportation and Public Works Department plans and implements creek restoration projects as funding becomes available. Future creek restoration for Roseland Creek may be completed as a separate project in the future as funding allows.

The value of valley oaks along Roseland Creek and throughout the project site is acknowledged. The proposed Master Plan has been designed to minimize tree removal and avoid impacts to trees as described in the Draft EIR.

Comment U.4: Also affecting the Roseland Creek riparian habitat is the plan to build a parking lot in the southern portion with 17 spaces. Due to the proximity of the creek at the SW corner, the narrow entrance off Burbank Ave leaves limited space between the creek and the area planned for the parking lot. An entrance road with handicapped parking and a turnaround would be better suited for this part, with the parking located north of the creek. Also, the addition of a large turf area, sports courts, and playgrounds are not all appropriate for this small space, and there is potential for adverse effects on the Purple Needlegrass sensitive area in the SE corner. Therefore, walking and bike trails, picnic areas, and natural playgrounds would be best for this space. A fitness circuit could be installed without too much impact to the natural vegetation. The nearby schools and other community parks nearby have sports courts and turf sport facilities.

Response U.4: The proposed entrance south of Roseland Creek aligns with an existing driveway for the former residence on the site. The proposed parking lot is located outside of the creek development buffer as shown in Figure 2.2-4. The purple needlegrass habitat on the site will be encircled by a trail and unaffected by the use of the lawn area, sports court, and playground on the western side of the parcel. The park areas south of Roseland Creek will include trails, picnic areas, and a playground as requested in the comment. This comment is acknowledged and does not raise any issues regarding the adequacy of the EIR, therefore, no further response is provided.

Comment U.5: The EIR is inadequate in addressing the restoration needs of the entire park regarding invasive species removal and monitoring. The northern meadow has a significant invasion of Harding grass (Phalaris aquatica). The Purple Needlegrass area in the SE corner may also be negatively impacted by the planned adjacent turf area, which will have to be mowed. Lawn mowing equipment can often transport and spread weed seeds, which will impact the native grasses. There should be some separation of the irrigated turf area and the Purple Needlegrass area, with either a berm or a buffer zone, such as a native plant landscaped area, to avoid weed introduction and

overwatering. Any plan for the undeveloped area south of the creek should specifically address the invasive Harding Grass present on site and restoration using locally sourced grasses and forbs should be implemented.

Response U.5: Refer to Response U.2. As described in Draft EIR Section 3.4 Biological Resources (page 41), the purple needlegrass community comprises approximately 45 percent relative cover with other predominantly non-native grasses and forbs including slim oat (*Avena barbata*), spring vetch (*Vicia sativa*), hairy cat's ear (*Hypochaeris radicata*), rose clover (*Trifolium hirtum*), and Spanish lotus (*Acmispon americanus var. americanus*). The purple needlegrass area on the site is currently interspersed with non-native vegetation and maintenance of the area will not be modified with development of the park. As shown in Figure 2.2-4, the purple needlegrass area will be segregated from other park uses by a trail.

Comment U.6: Finally, the paths proposed for the park are excessive in width, at 10 feet wide with a 2 ft gravel shoulder on each side. I propose the roads to be 8 feet wide, which is adequate for maintenance and will save money on materials. This change will also allow for more surface area for rainwater percolation and groundwater recharge.

Response U.6: Refer to Response E.5.

Comment U.7: This 20 acre parcel is unique in the neighborhood and in Santa Rosa. A remnant, regenerating Valley oak forest surrounded by development, it provides highly valuable natural resources to native plants and the animals who depend on them. A community nature park here, mostly undeveloped and restored where necessary, provides access for children to walk to school, for teachers to teach about oak woodlands and riparian habitat, for families to see wildflowers and birds, and for recreation such as dog walking, picnicking, and unstructured play in the neighborhood and for the City as a whole.

Thank you for accepting these comments.

Response U.7: This comment is acknowledged and does not raise any issues regarding the adequacy of the EIR, therefore, no further response is provided.

V. Madrone Audubon Society (dated June 5, 2024)

Comment V.1: We are writing to share our impressions and requests regarding the Draft Environmental Impact Report (DEIR). Madrone Audubon is headquartered in Santa Rosa and continues to enjoy a productive and positive relationship with the City of Santa Rosa. Our nonprofit Audubon organization is also a Chapter of National Audubon. Madrone Audubon serves approximately 3000 members in Sonoma County and the Bay Area.

You may recall we have taken an active interest in both the longstanding advocacy for acquisition with conservation of the Roseland Community Park parcels and subsequent planning process. Our interest has been in a balance of protecting and enhancing this ecological reserve with appropriate passive recreation for community members. We shared discussions about a possible environmental task force, offering to lead that, to convene our County nonprofit organizations, sharing in activities

and education for this special Nature Preserve in the making. The building to remain on-site was considered as a "Nature Center."

Like many, we were disheartened and deeply concerned about the outcome of the park design, which included multiple impactful elements in the supposed context of conserving, restoring and enhancing the wild acreage to support habitat, species and the ability to provide an educational Nature area. Indeed, this land should be considered local critical habitat.

We agree that a formal Environmental Impact Report to document and assess attributes and impacts was both appropriate and needed.

During the public review process, prior to obtaining the DEIR, your City staff and elected officials heard multiple comments from residents and students about the very strong desire to ensure protection of the oak woodland, creek and riparian corridor, grassland and overall habitat. We also heard concurrent support for appropriate passive recreational opportunities that would fit well within the context of an ecological reserve.

When I first visited the Roseland Creek property, I observed a large active Red-tailed Hawk Nest high in a tree on-site. This was a remarkable observation. With many site visits in the past 8 years, even with some detrimental activities occurring on the property, the importance of the Roseland Creek property as the ecological reserve it continues to be, with potential for quiet passive enjoyment and habitat protection and enhancement, cannot be overstated.

Our DEIR review and comments will focus on supporting this continuing experience and opinion by discussing Biological Resources.

In the midst of Roseland, across from Roseland Creek Elementary School, with nearby residences, the Roseland Creek Community Park land is described as follows:

"Seven biological communities were identified on the project site (refer to Figure 3.4-1). Nonsensitive biological communities include non-native grassland, developed/landscaped areas, and disturbed valley oak woodland. Potentially sensitive biological communities observed on the project site include intermittent stream (Roseland Creek), valley oak riparian woodland, riparian wetland, and purple needlegrass grassland, all of which are detailed following Figure 3.4-1.
bio resources"… (p. 38)

The variety of habitat types, including the creek with riparian corridor and possibility for ongoing restoration, also reflect the biological resources/species who rely on this area for survival as well as the City of Santa Rosa securing this habitat in a climate crisis where all we can do to support species survival is very important. Your Santa Rosa students from elementary to high school age will understand your positive action in this regard - if you make decisions to support high level conservation. Educational opportunities as well as community volunteering will help connect community members to their ecological reserve – and conservation that is needed will occur. It is not an understatement to say the City of Santa Rosa and the Roseland community can cultivate and support a world-class Nature Preserve while also providing passive recreational amenities for residents of the community.

Response V.1: This comment is acknowledged and does not raise any issues regarding the adequacy of the EIR, therefore, no further response is provided.

Comment V.2: We encourage you to review and consider the opinion and report of Shawn Smallwood, Ph.D., his report filed from 2021. Dr. is a highly reputable biologist whose observations, analytical and reporting skills are skills are excellent and reliable. Through his report, comparing to the WRA report(s), you will gain insights as to accurate representation and documentation of biological resources on the Roseland Creek Community Park property. Dr. Smallwood's September 2021 report includes:

"…While visiting the site, I detected 38 species of vertebrate wildlife, 5 of which were special-status species (Table 1). The site supports oak titmouse, of which there are many, and Anna's hummingbirds (Photos 8 and 9). I saw Nuttall's woodpeckers and a colony of acorn woodpeckers (Photos 10 and 11), Pacific-slope flycatcher and black phoebe (Photos 12 and 13), California scrub-jays and mourning doves (Photos 14 and 15), hooded orioles (Photo 16) and turkey vultures (Photo 17), among other species. I also saw invasive species, including wild turkeys and Eastern fox squirrels, both species of which were introduced to California from their natural ranges east of the Mississippi River, and a house cat on the hunt (Photo 18). Occurrences of non-native species, and more explicitly the ratio of non-native to endemic species, reflect on the ecological integrity of a place (Smallwood 1994). In the case of Roseland Creek Community Park, the ratio of 3 non-native to 35 endemic species of vertebrate wildlife, or <8% of the species I detected, indicates a high degree of ecological integrity. Given its interior location within the City of Santa Rosa, I would have expected a higher percentage of non-native species. The Park is relatively intact, ecologically, and it is rich in wildlife"…

The park project design the City of Santa Rosa Council approved is too impactful and unbalanced. Community groups, residents, students and teachers have appealed to the City for many years to create an ecological reserve with passive recreation, cultural elements, and educational opportunities. This direction is what is optimal for the Roseland Creek property. We strongly encourage you to consider changing course to a more positive, balanced, climate-supportive and innovative park design and project. Of course, we remain interested in supporting and participating. Understanding and achieving the balance of human activity with sensitivity to habitat areas can lead to best decisions and outcomes. Madrone Audubon has a 12-year history of nesting support for the West 9th Street heron and egret rookery in SW Santa Rosa. We are expanding our relationship with Lincoln Elementary School, thanks to a grant from National Audubon, for habitat gardening to support survival of birds, butterflies, bees and other species in need. We would, as we have shared in the past, want to support the City of Santa Rosa's change of course and decisions for the ecological reserve in Roseland.

Response V.2: The biological resources assessment prepared for the project is an accurate representation of the potential habitats and species on the project site. The biological resource impacts identified in the Draft EIR adequately characterize the impacts of the project under CEQA (pages 34-58).

The proposed Master Plan was developed with a substantial amount of community input received in over 30 meetings for the project. The Board of Community Services reviewed and recommended approval of the proposed Master Plan in July 2021. The

Master Plan, as proposed, incorporates input from the Roseland area community and was developed to balance the desire for both active and passive recreational uses. This comment does not raise any specific questions regarding the adequacy of the EIR. The City acknowledges the commenter's opposition to the Master Plan approval, as proposed.

W. Mary Goe (dated May 11, 2024)

Comment W.1: I would like to see the nature park kept as natural as possible. The fewer parking spaces the better. I would like to see the creek restored and the concrete removed. Some of the concrete wall along the creek has collapsed and I fear it could be dangerous to children playing in the creek bed.

Response W.1: The proposed Master Plan provides for primarily passive recreational uses north of Roseland Creek and will be developed consistent with the existing conservation easements on the property. As described in Section 2.2.2.1 Access, Circulation, and Parking, the project proposes a limited number of parking spaces that will be constructed concurrent with the park amenities they're intended to serve.

The proposed project focuses on recreational improvements and amenities and will not modify the bed or banks of Roseland Creek. The City has a Citywide Creek Master Plan that guides their restoration of creeks throughout the City. The Recreation and Parks Department does not typically incorporate creek restoration into park projects. The City's Transportation and Public Works Department plans and implements creek restoration projects as funding becomes available. Future creek restoration for Roseland Creek may be completed as a separate project in the future as funding allows.

X. Natasha Granoff (dated June 17, 2024)

Comment X.1: I am a 25-year resident of Santa Rosa and have walked the proposed Roseland Community Park many times with various agencies and residents who are passionate about saving one of the last remaining valley oak woodlands in Sonoma County. I concur with the comments of three letters you have received regarding the DEIR: from the California Oaks Program of the California Wildlife Foundation, from Milo Baker Chapter CNPS and from Lynn Houser. I would like to add, from an aesthetic and environmental perspective, developing a "standard city park" requiring significant infrastructure that removes established native trees and vegetation, destroys a valuable ecosystem and its biodiversity, adds heat islands of concrete and asphalt, contradicts Santa Rosa's greenhouse gas reduction goals, and climate resilience goals, which include the human need for natural spaces so important in a quickly changing climate. And finally, the irony of the expense of destroying an ecosystem important to all life, humans, and animals, and then spend maintenance hours maintaining an unnatural system is based on old ideas. Let us go forward differently, and make this a training ground for environmental inquiry, by the local community, schools, and non-profits. We are way beyond business as usual, we cannot afford business as usual.

Response X.1: The proposed Master Plan was developed with a substantial amount of community input received in over 30 meetings for the project. The Master Plan, as

proposed, incorporates input from the Roseland area community and was developed to balance the desire for both active and passive recreational uses. The Master Plan has been designed to avoid impacts to native trees and vegetation. As described in Section 3.8.2.2 of the EIR, the project will adhere to applicable measures in the City's Climate Action Plan resulting in a less than significant greenhouse gas emissions impact at a project and cumulative level. This comment is acknowledged and does not raise any issues regarding the adequacy of the EIR, therefore, no further response is provided.

Y. Richard Ingram (dated June 17, 2024)

Comment Y.1: Thank you for the opportunity to submit comments regarding the DEIR.

My comments pertain, in part, to sections within the DEIR regarding Land Use and Planning, Hydrology and Water Quality and Wildfires. Analyses within these three sections of the DEIR appear incomplete:

- Impacts regarding Land Use and Planning have not considered the transition of the future park from it's past use under private ownership to public use.

- Impacts regarding Hydrology and Water Quality have not considered the potential for ongoing occupation by unhoused people.

- Impacts regarding Wildfires have not considered the fuel load inventory as it relates to both park maintenance capability the potential for ongoing occupation by unhoused people

The DEIR is, as well, silent concerning a discussion regarding Public Safety. Our environment, how we live, how we utilize public spaces, how public spaces are administered and maintained, all influence Public Safety. In our modern era, design elements of public spaces, including parks, are typically shaped with major considerations toward Public Safety. How the park will be maintained, administered, policed are all factors that may significantly impact the environment as it relates to water quality, wildfires and the health and welfare of those residents using the park and those who live adjacent to the park. Will there be sufficient resources dedicated by police, fire and parks departments to maintain this new park in a manner that avoids environmental impacts? That question needs to be considered in the DEIR in a way that assures those public officials who are considering the project for approval that the development of the proposed park will put an end to the significant risks to the environment that, for the past several years, have occurred on the parcels of land where the park is planned.

The DEIR should assess whether the City has capacity with current infrastructure and staffing levels of the police, fire and parks department to actually do what is necessary to provide a level of service that will assure people using that park or people living adjacent to the park that it will be a safe place. The four parcels that make up the land for future park are now open space, owned, maintained and policed by the City. The 19-acre site has, for the past several years, been a revolving door for unhoused transients. The site has been set on fire numerous times over the years. Huge accumulations of trash left by unhoused people have occurred. There have been fights, arrests,

trespassing and theft from adjacent homes boardering the future park. Unhoused people have used the future park site and Roseland Creek as a toilet and a trash receptacle.

Response Y.1: CEQA requires that the physical impacts of a project be considered in the EIR. The project site is located in an urban area that is served by existing public services. As discussed in Draft EIR Section 3.15 Public Services (page 122), the use of the site as a park will not result in an expansion of the service area for the police or fire departments and, therefore, construction of additional facilities to provide those services will not be required. The proposed park will include trash receptacles to reduce the potential for littering within the park property. In the event illegal activity is observed on the park property, residents are encouraged to contact law enforcement. City policy related to unhoused populations will be enforced on the project site.

In accordance with the City's Business and Strategic Action Plan, once the park is developed, a moderate level of service will be provided based on the passive use of the site and limited number of amenities proposed. For example, maintenance tasks, such as turf mowing, are anticipated to be completed on a bi-weekly basis during the growing season as occasional use of the lawn area is anticipated. Additionally, special purpose maintenance will be interlaced with the general maintenance as necessitated by the proposed improvements. The frequency of maintenance will vary from daily trash removal to annual maintenance of benches, structures, and signage.

Comment Y.2: Section 3.11, Land Use and Planning, speaks to the conformity of the proposed park with the current land use. This land has been open space for some time and the creation of a park is certainly a natural progression given the City's growth and annexation of Roseland. Prior to being open space, it was rural farmland. Existing homes, for instance, along Hughes Avenue which border the entire northern boundary of the proposed park, were constructed in the early 1950's and bordered what was then farmland. Being adjacent to a proposed public park is significantly different than being adjacent to private farmland. The real change in land use that needs to be addressed in the DEIR is from private land that was held by individuals where access was controlled and maintenance of that land was responsibly undertaken, to now - ownership by public entities. The development of the park is just the final step in the conversion of what was once private land to public land. The issues associated with private residences bordering public land include public safety issues. Those owning homes in the neighborhood along Hughes Avenue that back up to the proposed park have long had to suffer the consequences of the lack of maintenance and security of what was once private land and is now public land.

Response Y.2: The use of the project site for a public park was previously considered in the City's General Plan and Roseland Area/Sebastopol Road Specific Plan. Recreational land uses are generally compatible with residential use. The conversion of the project site to a formal park use will result in increased maintenance of the site.

Comment Y.3: Questions of how the City will prevent unhoused people from camping in the park, building fires in the tall grass should be addressed in the EIR. The park plan that's associated with this environmental document creates very little change to the landscape. As an example, the first

several hundred feet south of the northern park border will remain essentially unchanged. The DEIR indicates that there are no impacts associated with land use changes. In fact, there have been impacts associated with the creation of this public land. The open space district and now the City have historically not provided an adequate level of maintenance throughout the period of this long and drawn out process of creating a park. Weeds are not mowed until they are 6 feet tall. Unhoused people camp and build fires during high fire danger periods subjecting the entire neighborhood to unnecessary risks.

Prior to public or quasi-public acquisition of this property, the land was farmed in a responsible manner. Trespassing was not allowed. Now that the City has the property, unhoused people have more rights to use the land than they once did when the land was under private ownership. This change in ownership created a change in land use, a change in the level of public safety and definite impacts to the environment. These impacts are not being addressed in the DEIR.

> **Response Y.3:** CEQA requires that the physical impacts on the environment be addressed in the Draft EIR. The creation of a formal park on the site will result in increased maintenance and general public use of the site which could discourage unhoused populations from congregating on the property. City policy related to unhoused populations will be enforced on the project site.

Comment Y.4: Section 3.10 discusses Hydrology and Water Quality. Currently there are environmental impacts occurring every day within the proposed park boundary from unhoused people that are not utilizing sanitation facilities. With the creation of the park, how will the City ensure that these impacts do not continue. The plan for the park calls for the installation of a split rail fence along Burbank Avenue and closing a gate at night. Will that be adequate to prevent unhoused people from continuing to do what they do now? These potential impacts are not discussed in the DEIR.

> **Response Y.4:** The proposed Master Plan will allow for the development of a park on the property and does not propose any facilities to serve unhoused populations. The park will be open from sunrise to sunset and vehicular gates will be manually opened and closed on a daily basis to prevent overnight parking on the property. Restroom facilities will be provided to serve park users. City policy related to unhoused populations will be enforced on the project site.

Comment Y.5: Section 3.20 discusses Wildfires. The DEIR indicates there are no significant impacts associated with wildfires. Unhoused people building fires in tall grass has the potential to create huge environmental impacts. The potential exists for the destruction of an entire neighborhood. Air quality, water quality, impacts to health and welfare are all potential impacts. There have been numerous unhoused people who are allowed to camp on City owned property for extended periods of time without facilities, without water, without sanitation, without rules to be followed. The creation of the park does not solve these problems if the land that is being utilized does not change and the enforcement of the rules remains the same.

> **Response Y.5:** Refer to Response I.8 for information related to recent fires on the site. City policy related to unhoused populations will be enforced on the project site. CEQA requires that the Lead Agency avoid speculation in the DEIR. The

development of a park on the project site is not intended to provide services or facilities for unhoused populations.

Comment Y.6: Parks and open space are terrific ideas and healthy for a neighborhood. Housing the unhoused is a complex and daunting problem facing Cities. The issues around the interface between public and private land are difficult problems to address. However, the City should take ownership of these problems and provide resolutions to an ongoing and old issue that has plagued this neighborhood. And it needs to begin by including evaluation of these real issues within the context of this environmental document.

It is unfortunate that this land has not been developed into a park in a timely fashion. Now that the City is involved I am hopeful that a wonderful park will be created. The City has inherited numerous pre-existing problems with the annexation of Roseland. One of the largest problems may be one that is not well recognized. Surface water drainage in the Roseland area is a very big challenge. Sebastopol Road, north of the proposed park, collects an inordinate amount of debris/garbage that makes its way into surrounding waterways. This is an environmental problem that is likely beyond the scope of this DEIR, however Roseland Creek runs right through the middle of the proposed park and the creek is subject to ongoing degradation from surface water discharges from streets in the area. An opportunity exists with the creation of this park to improve and address some of these surface water discharges while also reducing wildfire risks and addressing security concerns.

Response Y.6: The proposed park will include trash receptacles. Stormwater treatment on the park site will be provided consistent with the requirements of the Phase I MS4 permit. The City will limit impervious surfaces in the park consistent with the conservation easements on the project site.

Comment Y.7: Along the northern boundary of the proposed park, some of the past proposed park alternatives involved the creation of vernal pool wetlands. Some opinions expressed by consultants indicated that the vernal pool wetlands would not be as successful as one would hope. However, the creation of vernal pool wetlands is only one type of maintained wetland that can benefit the environmental health of the area. If the focus of the constructed wetlands were to change from creating vernal pool habitat to controlling pollution that's coming from street runoff, then wetlands could be successful. Much of the area north of the park eventually drains to Roseland Creek. If surface water collected during storms could be diverted before entering the Creek and routed through surface water treatment wetlands, harmful pollutants could be treated through passive natural processes by being slowly routed through these wetlands. The potential for area flooding could also be diminished by utilization of these wetlands as well by slowing the speed of the runoff thereby reducing the peak flows in the creek. These newly constructed treatment wetlands could act as a buffer between people that were utilizing the park and the residents that border the northern boundary of the proposed park. In this way, security for those residents could be improved, storm water pollution could be mitigated, and wildfire threats could be lowered by careful maintenance of these new wetlands.

Response Y.7: The project will incorporate stormwater treatment facilities on the park site. As discussed in Draft EIR Section 7.0 Alternatives (page 167), the project biologist reviewed the potential for constructed wetlands to be successful on the site and found the available watershed would be insufficient to establish wetland

characteristics in normal and above average rainfall years. Additionally, soil types on the majority of the project site, including the northerly property boundary, are comprised of well drained loams that have a high soil infiltration rate. These soils are not classified as hydric soils which are used as an indicator for wetlands. Importation of appropriate soil types to support wetland creation such as clay or bentonite is not generally supported by regulatory agencies. A constructed drainage to convey flows to a wetland on the project is also unlikely to provide adequate flow volumes to support a constructed wetland. Where wetlands are constructed, monitoring to ensure success criteria are met typically would occur over a five-year period with potential costs of approximately $50,000. Per acre construction costs, outside of a regulatory permit process, would be approximately $120,000 per acre. If the success criteria were not met over the five-year monitoring period, additional construction costs and monitoring costs may be warranted. Based on the above considerations, the City does not propose to incorporate constructed wetlands into the Master Plan.

Comment Y.8: The development of a park of this size is a significant undertaking for the City and it's also a significant opportunity to make Roseland better as a whole. Not enough has been done on this property for too long.

I implore that the City use thoughtful leadership to see that this park gets built and is done right, as well as being open to the opportunity that the creation of this park provides to address other issues in Roseland.

Response Y.8: This comment is acknowledged and does not raise any issues regarding the adequacy of the EIR, therefore, no further response is provided.

Z. Seth Tippey (dated June 2, 2024)

Comment Z.1: I want to start by saying that I know this project has been worked on for years and years, and there has been a lot of community involvement, both in trying to push this park forward and in resisting any change to the area. And as much as I want the natural beauty of this park to remain completely unchanged, I recognize that my wish is quite selfish, and that improving access will allow more people to enjoy this beautiful park. So I can see the need to add parking and make it easier for people of all ages to be able to walk the paths.

The part that I feel most compelled to comment on is the addition of the lawn area and sports court. My wife and I have been living in Roseland for years, and we've watched as all the open fields have disappeared. Development is everywhere -- including just beyond Roseland Creek Park where dozens of houses are being built as we speak -- and Roseland's natural beauty is being replaced. This is one of the few natural parks in Roseland that remains intact. Given how many other parks already exist in the area with sports fields/courts, why does this one need to turn into the same thing? Again, I do recognize that keeping the park exactly the same is unrealistic. What exists here is worth sharing, and I would be happy if more people got to enjoy it. Just don't destroy the parts of the park that are unique and replace them with generic sports fields/courts that you can find at every other park.

Response Z.1: The proposed Master Plan was developed with a substantial amount of community input received in over 30 meetings for the project. The Master Plan, as proposed, incorporates input from the Roseland area community and was developed to balance the desire for both active and passive recreational uses. Locating the active park uses south of Roseland Creek will allow for the northern areas of the park to remain in a more natural state. The park will also be developed consistent with the existing conservation easements for the site.

Comment Z.2: My wife and I watched two baby great horned owls grow up last year. I've never seen that in my entire life. I regularly encounter flocks of baby turkeys. Red shouldered hawks nest in the trees. This park is amazing. The fact that it's still here is amazing. The reason we bought our house here is because our property backs up to its open fields and trees. We have the gift of getting to walk our dog in this park every day, and I want more people to experience what they might not even know exists in their own neighborhood.

Please consider keeping the park as natural and undisturbed as possible. I know it won't be the same as it is today, but I think people would greatly benefit from having access to a park that's this beautiful and unique. Leave it undisturbed and see how the community reacts to having easier access to its paths along the creek before deciding to add features that make it like every other park in Roseland.

Thank you for your time and effort on this project.

Response Z.2: Refer to Response Z.1. This comment is acknowledged and does not raise any issues regarding the adequacy of the EIR, therefore, no further response is provided.

SECTION 5.0 DRAFT EIR TEXT REVISIONS

This section contains revisions to the text of the Roseland Creek Community Park Master Plan Draft EIR dated April 2024. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

Page iv Section 1.0 Summary; **REVISE** the first mitigation measure under Biological Resources for special-status bats as shown below:

MM BIO-1a.1: A qualified biologist shall conduct a roost assessment survey of trees and structures located within the project site prior to removal. The survey will assess use of the features for roosting as well as potential presence of bats. To prove absence, one to two nocturnal surveys with appropriate night vision equipment must be conducted during those times when bats would be occupying a roost (i.e., during the maternity season). If the biologist finds no evidence of, or potential to support bat roosting, no further measures are recommended as long as removal occurs within seven days of the survey. If evidence of bat roosting is present, additional measures described below shall be implemented:

- If evidence of bat roosting is discovered during the pre-construction roost assessment and demolition is planned March 1 through April 14, or ~~August~~September 1 through ~~February~~ October 14~~28~~ (outside the winter hibernation, and bat maternity roosting season), a qualified biologist should implement passive exclusion measures to prevent bats from re-entering the structures. After sufficient time to allow bats to escape and a follow-up survey to determine if bats have vacated the roost, demolition may continue and impacts to special-status bat species will be avoided. For tree removal that occurs during this time, trees should be felled in a two-step method as follows:
  - Remove limbs of trees first and leave them unprocessed on the site for at least 24 hours.
  - After the 24 hour period passes, the remainder of the tree can be felled and debris can be processed.
- If a pre-construction roost assessment discovers evidence of bat roosting in structures or trees during the maternity roosting season (~~March 1~~ April 15 through ~~July~~ August 31) or winter hibernation season (October 15 to February 28), and determines maternity roosting bats or hibernating bats are present, demolition of maternity roost or hibernation structures will be avoided during the maternity roosting and hibernation seasons or until a qualified biologist determines the roost has been vacated. Any trees removed during this time shall follow the two-step method of removal described above. **(Less Than Significant Impact with Mitigation Incorporated)**

Page 8 Section 2.2 Project Description; **REPLACE** Figure 2.2-3 Aerial Photograph and Surrounding Land Uses as shown on the following page.

AERIAL PHOTOGRAPH AND SURROUNDING LAND USES (REVISED) | FIGURE 2.2-3

Page 49 Section 3.4.2.1 Project Impacts; **REVISE** the text of the special-status bats mitigation measure as shown below:

MM BIO-1a.1: A qualified biologist shall conduct a roost assessment survey of trees and structures located within the project site prior to removal. The survey will assess use of the features for roosting as well as potential presence of bats. To prove absence, one to two nocturnal surveys with appropriate night vision equipment must be conducted during those times when bats would be occupying a roost (i.e., during the maternity season). If the biologist finds no evidence of, or potential to support bat roosting, no further measures are recommended as long as removal occurs within seven days of the survey. If evidence of bat roosting is present, additional measures described below shall be implemented:

- If evidence of bat roosting is discovered during the pre-construction roost assessment and demolition is planned March 1 through April 14, or ~~August~~September 1 through ~~February~~ October 14~~28~~ (outside the winter hibernation, and bat maternity roosting season), a qualified biologist should implement passive exclusion measures to prevent bats from re-entering the structures. After sufficient time to allow bats to escape and a follow-up survey to determine if bats have vacated the roost, demolition may continue and impacts to special-status bat species will be avoided. For tree removal that occurs during this time, trees should be felled in a two-step method as follows:
  - Remove limbs of trees first and leave them unprocessed on the site for at least 24 hours.
  - After the 24 hour period passes, the remainder of the tree can be felled and debris can be processed.
- If a pre-construction roost assessment discovers evidence of bat roosting in structures or trees during the maternity roosting season (~~March 1~~ April 15 through ~~July~~ August 31) or winter hibernation season (October 15 to February 28), and determines maternity roosting bats or hibernating bats are present, demolition of maternity roost or hibernation structures will be avoided during the maternity roosting and hibernation seasons or until a qualified biologist determines the roost has been vacated. Any trees removed during this time shall follow the two-step method of removal described above.

Page 64 Section 3.5.2.2 Cumulative Impacts; the following text will be **DELETED**:

~~Collection and evaluation of finds are also part of these mitigation measures.~~

Appendix B Biological Resources Assessment; **REPLACE** Figure 4 Special-status Wildlife Documented within 5 Miles of the Project Area with the revised figure shown on the following page.

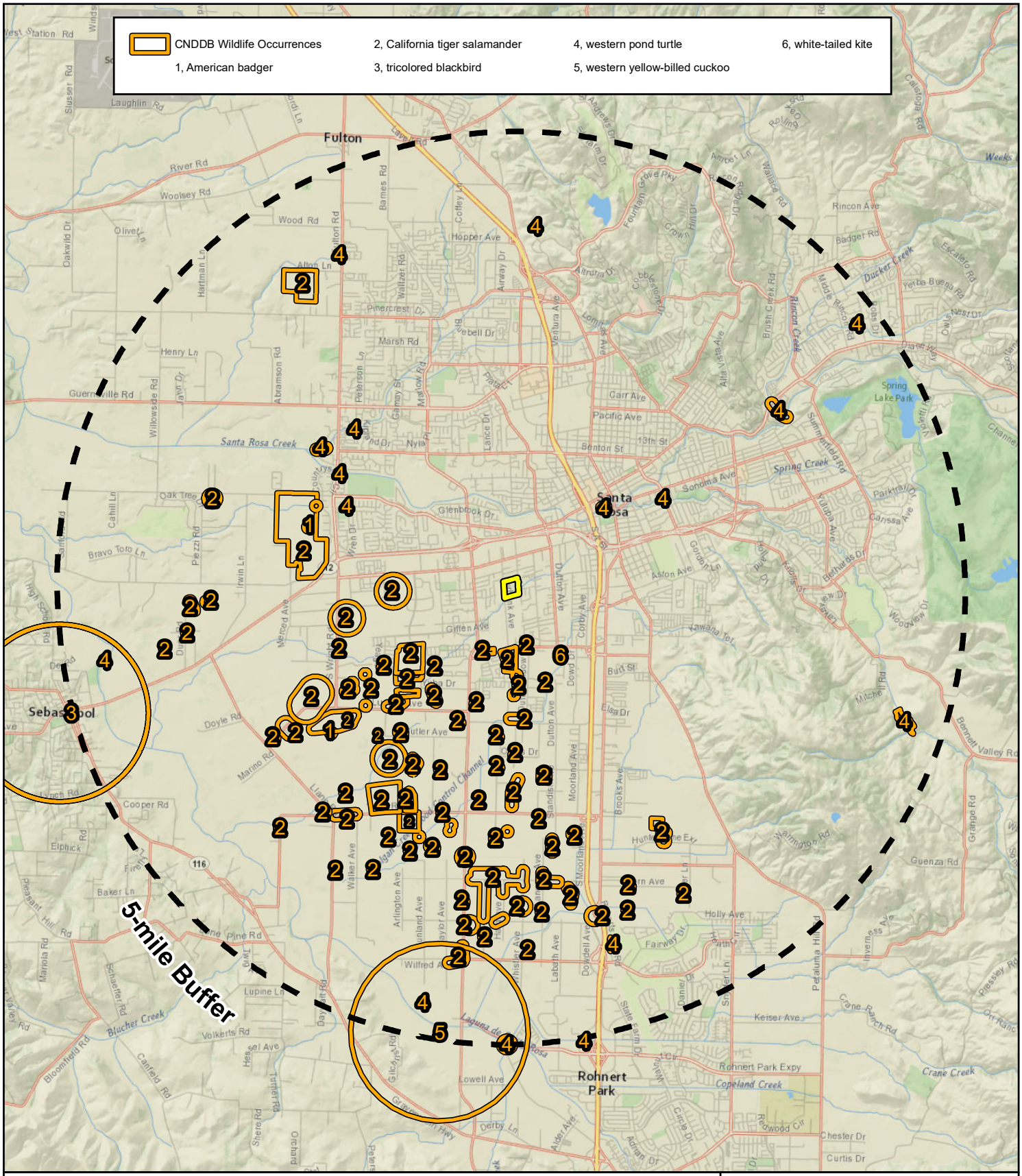


Figure 4. Special-status Wildlife Documented within 5 Miles of the Project Area

Roseland Creek Community Park
Sonoma County, California

0 0.5 1 2
Miles

ENVIRONMENTAL CONSULTANTS

Map Prepared Date: 5/26/2017
Map Prepared By: czumwalt
Base Source: National Geographic
Data Source(s): CNDDB May 2017

Path: L:\Acad 2000 Files\26000\26067\GIS\ArcMap\Fig 2 CNDDB wildlife.mxd

Appendix A: Draft EIR Comment Letters

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

June 10, 2024

Jen Santos, Deputy Director – Parks
City of Santa Rosa
55 Stony Point Road
Santa Rosa, CA 95401
JSantos@srcity.org

Subject: Roseland Creek Community Park Master Plan, Environmental Impact Report, SCH No. 2022080148, Sonoma County

Dear Ms. Santos:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an Environmental Impact Report (EIR) from the City of Santa Rosa (City) for the Roseland Creek Community Park Master Plan (project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1] CDFW previously submitted a letter dated September 7, 2022 in response to the EIR Notice to Preparation (NOP) for the project.

CDFW is submitting comments on the EIR to inform the City, as the Lead Agency, of our concerns regarding potentially significant impacts to biological resources associated with the project.

CDFW ROLE

CDFW is a **Trustee Agency** with responsibility under CEQA (Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources. CDFW is also considered a **Responsible Agency** if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), Lake and Streambed Alteration (LSA) Program, or other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Santa Rosa

Objective: The project proposes to construct a new community park to serve the Roseland neighborhood. Trails, interpretive signs, and upland habitat restoration in

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

existing grasslands are proposed for the northern section of the park. The central portion of the project site contains the oak (*Quercus* sp.) woodland habitat, which would be left intact and would also contain trails and interpretive signs. A nature center and restroom building would be constructed near the parking lot on the west side of the park, north of Roseland Creek. A picnic area and outdoor classroom or community garden would be located along the northern side of the riparian corridor along Roseland Creek at the edge of the oak woodland. On the south side of the riparian corridor, there would be a restroom near the parking lot, picnic areas (including single-use BBQs), a nature-themed play area, a lawn area, and sports court. A trail surrounding the lawn and play areas would include fitness stations. The existing purple needlegrass (*Stipa pulchra*) grassland area near the southeast corner of the site would be preserved, with trails encircling it. The site currently consists of primarily undeveloped land. Habitat on-site consists of annual grasslands, oak and riparian woodlands, and Roseland Creek.

Location: The 19.49-acre project site is located at 1027 McMinn Avenue, and 1360, 1370 and 1400 Burbank Avenue (Assessor's Parcel Numbers 125-331-001, 125-252-003, 125-252-002, and 125-252-004) in the City of Santa Rosa and in Section 27, Township 7 North, Range 8 West of the Mount Diablo Meridian U.S. Geological Survey 7.5' quadrangle map, at approximately Latitude 38.423440°N, Longitude 122.733154°W.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Incidental Take Permit (ITP) must be obtained if the project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the project. **As indicated in CDFW's NOP response letter and further described below, the project has the potential to result in take of California tiger salamander (*Ambystoma californiense*), which is CESA listed as threatened species, and Sonoma sunshine (*Blennosperma bakeri*), Sebastopol meadowfoam (*Limanthes vinculans*), and Burke's goldfields (*Lasthenia burkei*), which are CESA listed as endangered species.** Issuance of a CESA ITP is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the project will impact CESA listed species, early consultation is encouraged, as significant modification to the project and mitigation measures may be required in order to obtain a CESA ITP.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially restrict the range or reduce the population of a threatened or endangered species. (Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064, & 15065). Impacts must be avoided or mitigated to less-than-significant levels unless the

CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the project proponent's obligation to comply with CESA.

Lake and Streambed Alteration

An LSA Notification, pursuant to Fish and Game Code section 1600 et seq., is required for project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW will consider the CEQA document for the project and may issue an LSA Agreement. CDFW may not execute the final LSA Agreement (or ITP) until it has complied with CEQA as a Responsible Agency. **Thank you for including the requirement of an LSA Agreement as a mitigation measure in the EIR.**

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. **Attachment 1** includes a Draft Mitigation Monitoring and Reporting Program for CDFW's recommended mitigation measures.

I. Mandatory Findings of Significance: Does the project have the potential to substantially reduce the number or restrict the range of a rare or endangered plant or animal?

COMMENT 1: Page 42-43, Environmental Setting and Related Impact Shortcoming

Issue: The EIR indicates that wetlands are present within the project site. Wetlands in the Santa Rosa Plain may support Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields. Sebastopol meadowfoam has been documented one mile southwest of the project site (California Natural Diversity Database [CNDDB] Occurrence Number 1).

As noted in CDFW's NOP response letter, *the Santa Rosa Plain Conservation Strategy, Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain* (https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy) and CDFW's 2018 *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities*

(https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) provide guidelines for acceptable survey documentation for protocol-level surveys for CESA and federally listed plants on the Santa Rosa Plain. According to the EIR, protocol-level surveys were conducted in March, April, and May 2018, and one follow-up site visit in May 2022, with negative results. However, the above Santa Rosa Plain Conservation Strategy (Strategy) protocols require two years of surveys with a minimum of three visits during the growing season per year to be considered valid. Only one site visit was made during 2022, therefore this survey may not be considered valid. In addition, survey reports were not included with the EIR so it is unclear if all elements of the survey were completed in conformance with the above protocols.

Specific impacts and why they may occur and be significant: Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields are CESA and federally listed as endangered species. These species may be directly or indirectly impacted by the project, and due to inadequate surveys, they may be present on-site but remain undetected resulting in mortality of individuals or indirect impacts from degradation of habitat adjacent to ground disturbance due to altering hydrological conditions or other factors. Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields are considered endangered under CEQA pursuant to CEQA Guidelines section 15380. Therefore, if these species are present on or adjacent to the project site where they would be directly or indirectly impacted, the project may substantially reduce the number or restrict the range of these species, which would be a *mandatory finding of significance* pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommended Mitigation Measure: For an adequate environmental setting, to comply with CESA and the federal Endangered Species Act (ESA), and to reduce impacts to Sonoma sunshine, Sebastopol meadowfoam, and Burke's goldfields to less-than-significant, CDFW recommends including the following mitigation measure in the EIR.

MM-BIO-1. The project shall submit to CDFW two years of completed botanical survey results and obtain CDFW's written approval of the results prior to project construction. The botanical survey results shall follow CDFW's 2018 *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and the Santa Rosa Plain Conservation Strategy, Appendix D: *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain* (https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy). If CDFW is unable to accept the survey results, the project shall conduct additional surveys prior to initiation of project activities or may assume presence of Sonoma

sunshine, Burke's goldfields, and Sebastopol meadowfoam. Please be advised that for CDFW to accept the results, they should be completed in conformance with CDFW's 2018 *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and the Santa Rosa Plain Conservation Strategy, Appendix D: *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain* (https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy), including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys conducted during drought conditions may not be acceptable. If the botanical surveys result in the detection of the above CESA listed plants that may be impacted by the project, or the presence of these species is assumed, the project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP. In addition, the project shall consult with the U.S. Fish and Wildlife Service (USFWS) for any impacts to suitable habitat for plants listed under the federal ESA.

COMMENT 2: Page 44-45, Environmental Setting, Mitigation Measure, and Related Impact Shortcoming

Issue: The EIR states that California tiger salamander are unlikely to occur in the annual grasslands and oak woodlands within the project limits. However, several other projects in the immediate vicinity of the project site obtained ITPs for California tiger salamander as described in CDFW's NOP response letter. In addition, three occurrences of California tiger salamander have been documented within 0.75 mile of the project (CNDDB Occurrence Numbers 11, 62, and 72) and California tiger salamander dispersal to the project site may be possible through the surrounding low-density development.

In addition, the EIR includes MM-BIOc.1-1, which states, "*Prior to the commencement of ground disturbing activities, the site shall be inspected for burrows or other refugia that could support CTS. If none are detected, work can proceed without further measures. If burrows or other refugia with potential to support CTS are detected and cannot be avoided, the project shall consult with CDFW to determine if any additional measures, including an incidental take permit, may be required."* The project description is unlikely to feasibly avoid burrows and other upland refugia, especially south of Roseland Creek. In addition, any California tiger salamander may be effectively isolated from breeding and upland habitat by construction of the project, resulting in impacts to the species. Additionally, regardless of the current presence of California tiger salamander, the project would still result in permanent loss and likely temporary loss of suitable California tiger

salamander habitat, further degrading any potential recovery of this threatened and imperiled species.

Specific impacts and why they may occur and be significant: California tiger salamander may be directly or indirectly impacted by the project resulting in mortality of individuals from direct impacts or indirect impacts from degradation of habitat adjacent to ground disturbance and other factors. Additionally, the project would result in the permanent and likely temporary loss of California tiger salamander habitat. California tiger salamander are considered threatened under CEQA pursuant to CEQA Guidelines section 15380. Therefore, if California tiger salamander are present on or adjacent to the project site where they may be directly or indirectly impacted, or habitat loss occurs, the project may substantially reduce the number or restrict the range of these species, which would be a *mandatory finding of significance* pursuant to CEQA Guidelines section 15065, subdivision (a)(1).

Recommended Mitigation Measure: For an adequate environmental setting and to reduce impacts to California tiger salamander to less-than-significant and to comply with CESA and federal ESA, CDFW recommends including the following mitigation measure in the EIR.

MM BIO-2. Prior to commencing project construction, the project shall obtain a CESA ITP from CDFW for impacts to California tiger salamander and comply with the ITP. The project shall also obtain authorization from the USFWS for impacts to California tiger salamander and comply with the authorization. The project shall provide habitat compensation for California tiger salamander in accordance with the Strategy, CESA ITP, and USFWS authorization. Please note that the CESA ITP habitat compensation requirements are often consistent with the Strategy but may differ based on current information and site-specific conditions. CDFW staff are available to assist with the ITP process.

ENVIRONMENTAL DATA

CEQA requires that information developed in EIRs and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during project surveys to CNDDB. The CNDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

ENVIRONMENTAL DOCUMENT FILING FEES

The project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (See: Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the EIR to assist the City in identifying and mitigating project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Nick Wagner, Senior Environmental Scientist (Specialist) at (707) 428-2075 or Nicholas.Wagner@wildlife.ca.gov; or Melanie Day, Senior Environmental Scientist (Supervisory) at (707) 210-4415 or Melanie.Day@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...

Erin Chappell
Regional Manager
Bay Delta Region

Attachment 1: Draft Mitigation Monitoring and Reporting Program

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2022080148)
Vincent Griego, USFWS - Vincent_Griego@fws.gov

ATTACHMENT 1

Draft Mitigation Monitoring and Reporting Program

Biological Resources (BIO)		
Mitigation Measure (MM) Description	**Implementation Schedule**	**Responsible Party**
MM-BIO-1. The project shall submit to CDFW two years of completed botanical survey results and obtain CDFW's written approval of the results prior to project construction. The botanical survey results shall follow CDFW's 2018 *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and the Santa Rosa Plain Conservation Strategy, Appendix D: *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain* (https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy). If CDFW is unable to accept the survey results, the project shall conduct additional surveys prior to initiation of project activities or may assume presence of Sonoma sunshine, Burke's goldfields, and Sebastopol meadowfoam. Please be advised that for CDFW to accept the results, they should be completed in conformance with CDFW's 2018 *Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities* (https://wildlife.ca.gov/Conservation/Survey-Protocols#377281280-plants) and the Santa Rosa Plain Conservation Strategy, Appendix D: *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain* (https://www.fws.gov/library/collections/santa-rosa-plain-conservation-strategy), including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts such as altering off-site hydrological conditions where the above species may be present. Surveys conducted during drought conditions may not be acceptable. If the botanical surveys result in the detection of the above CESA listed plants that may be impacted by the project, or the presence of these species is assumed, the project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP. In addition, the project shall consult with the USFWS for any impacts to suitable habitat for plants listed under the federal ESA.	Prior to ground disturbance	Project Applicant

MM BIO-2. Prior to commencing project construction, the project shall obtain a CESA ITP from CDFW for impacts to California tiger salamander and comply with the ITP. The project shall also obtain authorization from the USFWS for impacts to California tiger salamander and comply with the authorization. The project shall also provide habitat compensation for California tiger salamander in accordance with the Strategy, CESA ITP, and USFWS authorization. Please note that the CESA ITP habitat compensation requirements are often consistent with the Strategy but may differ based on current information and site-specific conditions. CDFW staff are available to assist with the ITP process.	Prior to ground disturbance	Project Applicant

From: Brenda L. Tomaras <btomaras@mtowlaw.com>
Sent: Thursday, May 23, 2024 9:06 AM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] RE: Roseland Creek Community Park DEIR

Good Morning Jen,

First, Lytton would like to thank the City for accepting its suggested revisions to the mitigation measures. I think it points to the good working relationship between the Tribe and the City. The only concern Lytton has is regard to the discussion portion to indicates that there will be collection and evaluation of any finds on site. Many tribes, including Lytton, do not want testing done on artifacts and in fact, would prefer that the items be reburied on the site. This is especially true for items that are conserved sacred or ceremonial. The onsite monitors are there to provide such crucial cultural information.

Thank you.

Brenda L. Tomaras
Tomaras & Ogas, LLP
10755-F Scripps Poway Parkway #281
San Diego, CA 92131
(858) 554-0550
(858) 583-3482 Mobile
(858) 777-5765 Facsimile

From: Ana Munoz [redacted]
Sent: Monday, June 10, 2024 10:42 PM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] Environmental impact report for Roseland Creek Park

Greetings Ms. Santos.
My name is Ana Munoz, I live near the Park being discussed and I have a few comments.
I have owned my house since 2011 and since I moved into the area there has been a constant desire first by the county of Sonoma and now the City of Santa Rosa to develop the park beyond what it is today. No doubt that the City will benefit financially by developing the park fully with restrooms, parking lots, paved walks, BBQ pits and playground, we know that when a grant is received, a good portion of the funds are destined for the City's use.
The City is not going to stop trying to push the development of the park until they get it, I have atended multiple meetings and every time there are meetings, public input, and manipulation of the desire of the people who are impacted by the development. I understand that my comments will fall in deaf ears because there is a conflict of interest.
However, the city will make a great mistake by destroying the existing park. Every time we have had meetings there is overwhelming desire to keep the park in its natural state. All it needs is a small budget to have quarterly paths' maintenance and grass mowing. Perhaps adding more native trees and shrubs and cleaning the creek to prevent mosquitoes.
Children play in the park and enjoy it as is. If we want playgrounds we have several within a mile radius. Rather than destroying the natural state of the park perhaps improving traffic flow from the 5 or more elementary schools in the immediate vicinity will make us happier since we don't have to have gridlock from parents driving children to and from school and making it impossible for the general public to conduct business.
Building sanitation facilities will bring vagrants and criminal activity to an area that is relatively calm and introducing vices to our young children.
For the past 12 years I have said to maintain the park as a nature park without infrastructure.
We have several parks withing walking distance with what you want to add to this park. Save the money and improve and maintain what we have, make them child and families friendly.
We want our children to have parks that are safe free of criminal activity.
This park is unique in its natural state with the creek habitat and native trees and fauna. improve what is there do not create another concrete disaster.
Thanks,
Ana Munoz

California Wildlife Foundation/California Oaks, 201 University Avenue, H-43 Berkeley, CA 94710, (510) 763-0282

May 30, 2024

Jen Santos, Deputy Director, Parks
Recreation and Parks Department
100 Santa Rosa Avenue
Santa Rosa, CA 95404

Transmitted via e-mail: jsantos@srcity.org

Re: Roseland Creek Community Park Master Plan Draft Environmental Impact Report, SCH No. 2022080148

Dear Ms. Santos:

The California Oaks program of the California Wildlife Foundation works to conserve oak ecosystems because of their critical role in sequestering carbon, maintaining healthy watersheds, providing plant and wildlife habitat, and sustaining cultural values. California Wildlife Foundation/California Oaks (CWF/CO) is writing about deficiencies of and problems with the Roseland Creek Community Park Master Plan Draft Environmental Impact Report (DEIR). This letter was prepared at the request of the Milo Baker Chapter of California Native Plant Society. California Native Plant Society is a member of California Oaks Coalition, which brings together 80 international, national, Tribal, state, regional, and local organizations to conserve and perpetuate the state's primary old-growth resource.

The park's design should protect the beauty, shade, habitat, flood protection, and carbon sequestration and cultural values of the land's oaks. These trees enhance the livability of surrounding communities by lowering air and soil temperatures, providing cooling shade, improving air and water quality, and providing a restorative natural environment in an area of Santa Rosa where natural areas are deficient.

Improvements to lands protected by a conservation easement should be protective of oaks. Appendix C of the DEIR, Section 3.3, Tree Impact Assessment, discusses the Oak Protection Area that is part of the conservation easement for 1400 Burbank Avenue, and the easement's provisions for low-intensity recreational and educational uses. The proposed removal of heritage valley oaks for trail alignment and paving would degrade the beauty, shade, habitat, flood protection, and cultural and carbon sequestration values that should be protected by the easement. Heritage oaks also provide seedlings for future oaks in this area, which if removed, would materially impair or interfere with the conservation values that are to be protected under the conservation easement. All trails should be designed to keep heritage trees standing. The DEIR is deficient in addressing this violation of the conservation easement. The conservation easement 3.0 (b) *Statement of Purpose* states, "Protect and preserve the natural resources of the property, including its riparian corridor and oak savanna" The conservation easement also "prohibits and prevents any use of the property that will materially impair or interfere with the conservation values of the property." All trails should be developed to go around heritage trees and to protect their root systems.

Significant trimming of valley oak tree #106, which is growing in the site's valley oak woodland, should not be carried out. Significant trimming is harmful to oak trees. (CWF/CO refers you to page four of *Care of California's Native Oaks*, which has a section on oak pruning.) The proposed action would damage the ecological importance and sensitivity of valley oak woodland. As a State Ranked 3 community, valley oak woodland is classified as *vulnerable* due to a restricted range, relatively few populations, recent and widespread declines, or other factors making it vulnerable to extirpation. The proposed significant trimming of tree #106 should not occur.

The proposed removal of four heritage trees and construction impacts on an additional 18 heritage trees are also in violation of the Department of Parks and Recreation's mission. The discussion, in Section 5.0, Summary and Recommendations, of the potential removal of four heritage trees and potential impacts on an additional 18 heritage trees from trail alignment and paving also runs counter to the mission of the Department of Parks and Recreation. Specifically, the destruction of the site's mature and protected trees is a dereliction of the department's duty to uphold the mission of "protecting environmental resources and promoting health and wellness." An art museum would not destroy its most important artworks as part of its "improvements." Similarly, Roseland Creek Community Park should not destroy its heritage oaks.

Section D (6) of Section 17-24.050 of the City of Santa Rosa's Tree Protection Ordinance states that "No compaction of the soil within the root zone of protected trees shall occur." The root protection area, which is half again as large as the area from the trunk to the dripline of an oak, is critical to oak tree health. More detail can be found in the above-referenced *Care of California's Native Oaks*, which includes sections on paving and other construction activities.

Mitigation for oak impacts is inadequate. The project should protect the oaks and the City of Santa Rosa should amend oak protections and mitigation requirements to reflect the tree's cultural values and importance in combatting the heat island effect, sequestering carbon, supporting biodiversity, protecting the watershed, and providing access to nature in the city. Trees that are impacted by the project should be replaced at a level that will offset the lost biomass and canopy of the removed trees and the substantial temporal loss of growth habitat structure and diversity.

The project, as currently conceived, should not be advanced. Thank you for your consideration of our comments.

Sincerely,

Janet Cobb
Executive Officer, California Wildlife Foundation
jcobb@californiawildlifefoundation.org

Angela Moskow
California Oaks Program Director
amoskow@californiaoaks.org

cc: Milo Baker Chapter of California Native Plant Society

The Honorable members of the Santa Rosa City Council, c/o Dina Manis, City Clerk, dmanis@srcity.org

Jen Santos, Deputy Director – Parks
jsantos@srcity.org

RE: Roseland Community Park Draft Environmental Impact Report (DEIR)

The Milo Baker Chapter of the California Native Plant Society (CNPS) is providing the City of Santa Rosa with these comments on the proposed April 2024 Roseland Neighborhood Park Draft Environmental Impact Report (DEIR). The Milo Baker Chapter is the Sonoma County representative of the California Native Plant Society, and our mission is to "Conserve California native plants and their natural habitats, and increase understanding, appreciation, and horticultural use of native plants." Our members have been involved in the park planning process by attending the public meetings, providing written feedback, and visiting the site to educate local schools about the plants, habitats, and overall ecology that is present on this proposed park property.

This property has many different habitats that are in the process of natural regeneration but require some restoration actions to return the natural ecosystem functions. We greatly appreciate that the City will preserve many of the natural areas including the rare purple needlegrass grassland, the northern meadow, the oak woodland, and the habitat adjacent to Roseland Creek. We also appreciate the nature center and interpretive signs because these park elements are in alignment with the Native Plant Society's mission and would support the community's understanding and appreciation of the natural features present in this proposed park.

The following comments, both general in nature and specific to DEIR, are in aid to ensure restoration, enhancement and education within this jewel of a City park.

The EIR did not reflect the need for the restoration of Roseland Creek and the need to remove the approximately 400 linear feet of channelized and, in some areas, concrete in the creek and to make the creek more climate change resistant.

As we wrote previously in 2020, restoration of Roseland Creek should be addressed as part of the park plan. While the City has a Citywide Creek Masterplan (CCMP) that envisions restoration of this creek and the community has presented a more detailed vision of creek restoration, nothing was written in the DEIR addressing this issue. Roseland Creek's headwaters are located at the Railroad tracks near West Barham Avenue where the creek passes through private parcels in Roseland for three blocks before passing under McMinn Avenue entering proposed park property. This is the most natural upstream area of the creek and restoration, and preservation of the creek would create excellent native plant and wildlife habitat. Downstream of the park, the creek passes through open space and protected habitats and a creek trail is partially built and planned to connect near the confluence of Roseland Creek and the Laguna de Santa Rosa just west of Llano Road. Creeks can serve as a habitat corridor that would connect the open space of the Laguna with the residents in Roseland. Habitat corridors are defined as natural areas that allow animals to move throughout areas and get much-needed habitat. Intact riparian habitat supports many bird and wildlife species that enrich our lives. A restoration plan should be included in the DEIR as part of the planning process.

The EIR did not cite the 2014 CCMP Appendix C Roseland Creek Restoration Plan and state how the park Master Plan will incorporate the Restoration needs of Roseland Creek.

The CCMP identifies the following: "Construct a self-maintaining channel with adequate bank-full dimensions to transport sediment, contain healthy riparian vegetation and convey the 100-year flood."

This should be addressed before construction of any Creekside amenities. The Roseland Creek Master plan cites the following Santa Rosa General Plan Policies:

OSC-D-7	Rehabilitate existing channelized waterways, as feasible, to remove concrete linings and allow for a connection between the stream channel and the natural water table. Avoid creating additional channelized waterways, unless no other alternative is available to protect human health, safety, and welfare.
OSC-D-8	Restore channelized waterways to a more natural condition which allows for more natural hydraulic functioning, including development of meanders, pools, rifles, and other stream features. Restoration should also allow for growth of riparian vegetation which effectively stabilizes banks, screens pollutants from runoff entering the channel, enhances fisheries, and provides other opportunities for natural habitat restoration

There is no discussion in the DEIR that these policies will be implemented for this park. One of the logical areas for the creek restoration is where the community garden area is proposed. The drawing incorrectly depicts riparian habitat along the northside of the creek where there currently is no riparian habitat.

The DEIR did not address invasive species removal.

The Roseland Creek Master Plan identified many moderate to highly invasive species that need to be removed prior to creation of park amenities. These species include Himalayan blackberry (*Rubus armeniacus*), cherry plum (*Prunus cerasifera*), hawthorn (*Crataegus monogyna*), woolly cotoneaster (*Cotoneaster pannosus*), harding grass (*Phalaris aquatica*), Mediterranen barley *(Hordeum marinum ssp. gussoneanum*), reed fescue (*Festuca arundinacea*), ripgut brome (*Bromus diandrus*), slim oat (*Avena barbata*), French broom (*Genista monsessulana*), Indian teasel (*Dipsacus sativus*), hairy cat's ear (*Hypochaeris radicata*), Italian thistle (*Carduus pycnocephalus ssp. pynocephalus*), periwinkle (*Vinca major*), fennel (*Foeniculum vulgare*), poison hemlock (*Conium maculatum*). A discussion of invasive species removal should be presented as part of the park plan.

The DEIR does not show a crosswalk on Burbank Avenue for the bike trail on the southside of Roseland Creek.

There is only one crossing of Burbank Avenue and it is shown to be in the northern portion of the park. If the southern trail is to be part of the Santa Rosa Bicycle and Pedestrian Master Plan, then a crosswalk is needed in this portion of the park to connect to the west side of Burbank Avenue and downstream on Roseland Creek. There are no crosswalks on the east side of Burbank Avenue. Page 10 states, "…fencing that will function as a natural barrier between vehicles and pedestrians traveling adjacent to Burbank Avenue and to help guide students to the future street crossing." The proposed crosswalk in the northern portion of the park, as proposed, will connect into the existing bus stop pullout lane. This should be changed to have the crossing tie into the existing sidewalk areas.

The proposed multi-use trails are too wide.

The DEIR states (page 4) "The proposed multi-use trail creek crossing would be a prefabricated bridge placed on abutments outside the top of bank. The multi–use trail meanders through the oak woodland habitat area in the center of the site and connects to McMinn Avenue. The trail would be a paved 10-foot-wide path with two-foot-wide gravel shoulders on either side, providing ADA access."

Sidewalks on Burbank Avenue are not 10 feet wide, and, in some areas, they are no more than 2 feet wide, and are adjacent to the busy road of Burbank Avenue. We feel that 10-foot-wide paved trails with an additional 2 feet on either side is excessive. We recommend that 8-foot-wide trails with 1 foot gravel shoulders on either side is appropriate and are within the ADA parameters identified by the City of Santa Rosa. Emergency vehicles will still have access along this width of trail.

Park improvements shall not result in impervious surfaces of more than 20 percent on the entire parcel of the park, not just 1400 Burbank Avenue property, as stated on page 5.

The Conservation Easement should not be piecemealed and should be rewritten to include the entire 20 acres under a single easement. The parameters of the easement should be standard for all of the park parcel and include impervious surfaces of no more than 20 percent.

Specific changes to DEIR
Bio Impact 1a (pages iv, page 63) – seasonality for bats

Bat seasonal dates in this area are (approximately) the following:
Maternity – April 15 – August 31
Winter Hibernation - October 15 to February 28

Therefore, if work is to be conducted in areas that may support roosting bats, and occupancy is assumed, *habitat removal must be conducted between March 1 and April 15 OR August 31 and October 15*. To prove absence, then one to two nocturnal surveys with appropriate night vision equipment must be conducted during those times when bats would be occupying a roost (i.e., during the maternity season). If negative findings occur, then habitat can be removed. However, if bats are present then removal must occur during the above stated times, *between March 1 and April 15 OR August 31 and October 15*. This would also tie in with protection measures for nesting birds.

Figure 2.2-3 Aerial Photo from 2018.

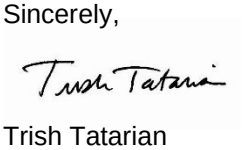
This figure should be updated to reflect the residential development on the south side of the park. There is a single parcel that is not developed but the parcel to the south at 1690 Burbank Avenue is currently under construction with 62 single family homes and 64 apartments and should be classified as residential and not rural residential.

Revise Appendix A Figure 4. Special Status Wildlife Documented within 5 miles of the Project Area.

The legend identifies plants and not wildlife species. In addition, the plants presented in the legend (alkali milkvetch, brittlescale, California alkali grass, etc.) do not occur in Sonoma County. Revise this Figure to reflect special status wildlife species reported in the area.

We feel that once the above comments, both general in nature and specific to the DEIR, are addressed and answered then the actions to ensure restoration, conservation and education within this jewel of a City park will be met.

Sincerely,



Trish Tatarian
Conservation Chair,
Milo Baker Chapter CNPS

Jen Santos, Deputy Director Parks - jsantos@srcity.org

Honorable Members of the Santa Rosa City Council c/o Dina Manis, City Clerk - dmanis@srcity.org

RE: Roseland Community Park Draft Environmental Impact Report (DEIR)

The California Native Plant Society (CNPS) is a science based, State-wide organization with chapters in most California counties and one in Baja, California. Our State offices are located in Sacramento. The mission of CNPS is the conservation of California's diverse native plants and related ecosystems. We also work to increase understanding and appreciation of California's biodiversity as well as encourage horticultural use of California native plants in both private and public settings.

Members of our Education committee helped identify and speak with faculty at various Roseland District schools. All the schools expressed considerable interest in the prospect of a readily accessible outdoor classroom, a living learning landscape, within walking distance of their schools. Roseland Creek Community Park also known locally as the NeighborWood became an outdoor classroom for two teachers from Roseland University Prep High School prior to the pandemic. This unique 20-acre gem of a park was used on several occasions for projects involving biology and language arts. The students from the language arts class ultimately created a video about the park.

Our then District Supervisor, Linda Hopkins, referred to the land as a "micro wilderness". Very few fast-growing urban cities possess this type of readily accessible resource representing a multitude of public benefits including those of physical/mental health, social and community cohesiveness. National and world-wide studies have documented these benefits, particularly to people residing in economically distressed neighborhoods.

Our local CNPS chapter Conservation Committee Chair, retired wildlife consulting biologist, Trish Tatarian, BSc, MSc, and the Directors of The California Wildlife Foundation/California Oaks Program have provided comments regarding numerous flaws and omissions in the recent DEIR for Roseland Creek Community Park. We, too, have concerns which include the following:

1. The DEIR omitted any plans for the restoration of the section of Roseland Creek running through the Park.

Roseland Creek feeds into the Laguna de Santa Rosa and subsequently the Russian River, a major source of drinking water for County residents. There is no discussion of restoration of the natural channel including removing the concrete lining a portion of the channelized. Creek. Restoration of this portion of the creek will allow safe passage of wildlife to and from the Laguna in a restored and healthy wildlife corridor.

Healthy riparian corridors help with flood control, ground water filtration and recharge, enhance and protect biodiversity. Riparian corridors possess an unusually diverse array of plant and animal species and provide critical environmental functions. They play an essential role in moving water to local aquifers aquifers, filtering toxic materials from water via percolation through not included any of humus enriched soils, slowing flood waters with meanders, riffles and sand bars. Healthy riparian corridors with strong, well established root systems help prevent stream bank erosion.

The current DEIR did not include any mention of the 2014, appendix c, Restoration Plan or any mention of how the Park Master Plan will incorporate the critical needs of Roseland Creek, despite the

identification of OSC - D-7 (Rehabilitate existing channelized waterways...) and OSC - D-8 (Restore waterways to a more natural condition...).

The Citywide Creek Master Plan states "... construct a self-maintaining channel with full-bank dimensions to transport sediments, containing healthy riparian vegetation and convey the 100 year flood waters." *These issues need to be identified and addressed before construction of any creekside amenities.*

There is no discussion in the DEIR that the above policies will be implemented in this Park. One of the logical areas for Creek restoration is where the community garden is proposed. The related drawing incorrectly identified riparian habitat on the North side of the creek where none actually exists.

2. The current DEIR does not address invasive species removal.

The Roseland Creek Master Plan identified many moderate to highly invasive plants species needing removal prior to creation of proposed Park amenities. Other comment letters provide detailed lists of these plants. *A discussion of the non-chemical removal of invasive plant species should be included as part of the park plan.*

Both restoration and invasive plants species removal present a unique opportunity for the inclusion of Roseland's culturally diverse residents in an Eco-Cultural model of community land stewardship. Families and individuals would have the opportunity to explore and share the histories of both invasive plant species as well as native plants, their cultural history and uses. Demonstrations, workshops, tastings, arts and crafts uses can be shared and explored as a way of drawing our diverse community together with a shared purpose. Indigenous folks, Latino, African American, Eritrean and other groups will be able to share in the literal "tending of a Park wide wild garden", a concept embraced today as well as for thousands ofyears by California's first peoples.

All these activities would help participants restore their connection to the land as well as develop a true sense of 'place' resulting in pride, connections to community and land.

Several local organizations including CNPS, the Laguna Foundation, Sonoma Ecology Center, Point Blue's STRAW program have These skilled staff and volunteers in the areas of invasives removal, native plant propagation and restoration. These groups could work with Parks and Recreation and local residents to effect a community program of invasive plants removal and restoration. The existing native species in the Park would have the space to grow and expand in this unique place.

3. The current DEIR does not address a controlled crosswalk on Burbank Avenue for the bike/pedestrian trail on the South side of the park.

The only crosswalk shown in the current plan is adjacent to a bus stop pull out at the North end of the Park. There are few sidewalks on Burbank Avenue. Originally classified as a "rural residential" road, Burbank has become an alternate commuter route with excessive speeding problems now exacerbated by increased traffic resulting from substantial new housing development in the Roseland area. *The current plan needs to be reconsidered.*

4. The proposed multiple use Park trails are wider than need be and will cause soil compaction, severe water runoff and damage to trees and plants.

Ten-foot-wide trails with two feet of gravel shoulder on each side is excessive. Eight foot wide trails with one foot gravel shoulders would comply with ADA requirements and will still provide access for emergency and maintenance vehicles. Paving materials should be permeable to allow water runoff to percolate into the soils. A good example of permeable paving can be seen in the large parking lot located at the rear of the SRJC Petaluma Campus. The original conservation easement for the Park calls for no more than 20 percent impermeable paving. *The conservation easement should be consistent throughout the park, not piecemealed.*

5. Removal of heritage oaks for park amenities is not appropriate for this park.

California's native oak woodlands are among the richest and most diverse of our ecosystems. The oak woodland/savannah supports more life forms than any other tree genus in California. Our native oaks sustain an incredibly complex web of life above and below ground including thousands of needed insects, hundreds of bird, reptile, amphibian and mammal species. Our oaks and plant species that live in native oak ecosystems are literally champions of carbon sequestration, soil stabilization and soil management. They provide all of us clean air and water, cooler air and soil temperatures, numerous pollinators for our gardens. The design of Roseland Creek Community Park should protect the shade, beauty, rich habitat, flood protection, carbon sequestration and cultural values of these oaks. Our native oaks enhance the biodiversity of the area. Our native oak ecosystems enhance the live ability of surrounding communities by lowering air and soil temperatures, improving air and water quality and providing a restorative natural environment. In this area of Santa Rosa, fast growing and low income, there is an obvious lack of natural areas easily accessible/bikeable/walkable. *Park amenities should be redesigned to avoid all heritage oaks.*

We fully concur with and support the comments/suggestions made by Janet Cobb, Executive Officer of the California Wildlife Foundation and Angela Moskow, California Oaks Program Director in their comments letter of May 30, 2024. Topics covered included the following:

A. Improvements to lands protected by a conservation easement should be protective of oaks.
B. Significant trimming of valley oak #106 should not be carried out.
C. The proposed removal of four heritage trees are also in violation of the Department of Parks and Recreation's mission.
D. Mitigation for oak pacts is inadequate.
E. This project as currently conceived should not be advanced.

We appreciate the opportunity to submit constructive comments regarding the current DEIR for Roseland Creek Community Park.

Sincerely,

Virginia B. Hotz-Steenhoven,
Certified California Naturalist, retired environmental educator and former Director/Curator, Marin Museum of the American Indian, Miwok Park, Novato
Ca. vbsteenhoven41@gmail.com

Catherine Lipson, Ph.D, Education Department Faculty S.F State University clipson@berkeley.edu
Co-chairs, Education/Outreach Committee, Milo Baker Chapter, CNPS.

From: David Jarrell [redacted]
Sent: Sunday, May 12, 2024 4:07 PM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] Roseland Creek Community Park

Hello Jen,

My name is David Jarrell, as a 30 year resident of the Roseland area it is nice to see we may get a park in our neighborhood. One thing I have not seen
in the plans is a dog park. There are a lot of area residents who walk their dogs daily and many area's lack sidewalks and safety can be an issue. The nearest
real dog park is at A Place to Play but the distance means you have to drive there. At 19.49 acres a ½ acre dog park would be easy to include and require
minimal maintenance. I don't believe a dog park would affect the Environmental Impact in any measurable way and I feel it would enhance the
overall park greatly.

Thank you for your time, David Jarrell

[redacted]

[redacted]

17 MAY 2024 PM 2 L

Gen Santos · Deir

[redacted]

May 17,2024

Dear Jen Santos

Recreation of Parks department

This is regarding the **Roseland Creek Community Park**

Please keep park and **NOT** parking spaces.

What our community needs is more parks and not development.

Parks make life better !

Thank you,

Diane Ballard

[redacted]

June 17, 2024

To : Jen Santos
Santa Rosa Recreation and Parks Dept.
Steele Lane Community Center
415 Steele Ln., Santa Rosa, CA 95403

Dear Ms.Santos,

Inadequacies abound in this so called Draft Environmental Impact Report for a proposed Roseland Creek Park. This draft is an inadequate report needing to be redone in many ways from start to finish.

Before detailing some of the main inadequacies an important point must be made about the inadequate access to the draft report for review by disadvantaged and poor Roseland residents. The report was not made available for residents in the local libraries as usually done with major government documents on proposed projects. This would seem to be a violation of the city of Santa Rosa guidelines for open government and efforts for inclusion of disadvantaged populations such as Roseland residents in the public policy decision making processes. Also a Spanish speaking person stated a Spanish translation was not available to them. This is inadequate.

To begin, one main inadequacy is the project is basically a road building and parking lot construction project centered first and foremost on automobiles and not Roseland Creek riparian corridor preservation and restoration. Roseland Creek needs to be front and center in all discussions of what will occur at any new Roseland Creek Park. Because Roseland Creek waterway is not adequately addressed in this draft report the entire document becomes legally suspect and totally inadequate.

Next the city of Santa Rosa has never done adequate management and maintenance of the properties at 1027 McMinn Ave., 1360 Burbank Ave., 1370 Burbank Ave., and 1400 Burbank Ave. once the properties were purchased with Sonoma County taxpayers' money and then deeded over to the city of Santa Rosa. Therefore it cannot be assumed the management, maintenance, and mitigation measures the report has in mind for any and all construction activities will be adequate. This letter states the DEIR is inadequate.

Santa Rosa claims to have an interest in "sustainability", therefore this report should show how the city intends to secure the fullest possible present, and long term, biological and ecological benefits for this park which will be under a conservation easement held by the Sonoma County Agricultural Preservation and Open Space District. The first conservation easement with this agency and Santa Rosa from 2011 is on the 5.9 acres at 1400 Burbank Ave. This was followed by the eleven acres at the north of the park addresses 1027 McMinn Ave. and 1360 Burbank

Ave. The city has not been doing the necessary stewardship of this land and cannot be trusted to keep its word from the DEIR addressed here.

Also, it is a canard to say there is the possibility of housing being built on the land at 1370 Burbank Ave. The city is in negotiations with the Sonoma County Agricultural Preservation and Open Space District to include this property under the existing conservation easements they cannot be decrease in strength.

Of utmost importance the report is inadequate in regards to dealing with California Tiger Salamanders. It must be assumed by the city this area is potential habitat for CTS and the city must prove they are not onsite before any type of construction projects begin at the site. This means the city must follow the CTS survey protocol and procedures to prove no CTS are at the site.

Also there are areas of Purple Needlegrass on the southern portion of the park at 1400 Burbank Ave. The city must show how the area will be protected from encroachment by any proposed activities. The report is inadequate in this regard.

Next because this project is more about automobiles and trucks driving onto the property and into the previously unpaved areas, the city needs to accurately assess the impacts of greenhouse gas pollution on the surrounding area. No accurate traffic studies have been on Burbank Ave. in many years. Now with the cumulative impacts of increased automobile traffic from use of Roseland Creek Elementary School as well as new housing developments totaling hundreds of units near the park the city must prove pollution from even more traffic will not negatively impact the flora and fauna as well as nearby residents. The report is inadequate in this regard.

Fire safety needs to be addressed because the city is typically delinquent in weed abatement. Numerous fires have been fought in the meadow and the woodland as well as next to the creek on the south side. The Burbank Ave. Fire Station Engine No. 8 has responded to numerous out of control fires which if not fought quickly might have spread to nearby housing to the east of the project site. One aspect of this is shows Fire trucks and city maintenance vehicles are ABLE to work the site without needing paved roads.

Regarding paved roads and parking lots the amount of stormwater pollution from contaminated runoff has not been adequately addressed. This inadequacy must be fully addressed in the report. Noting oil and fluids polluting the parking lots and roads should be a main concern as stormwater will runoff into the creek. The current draft is inadequate in this respect.

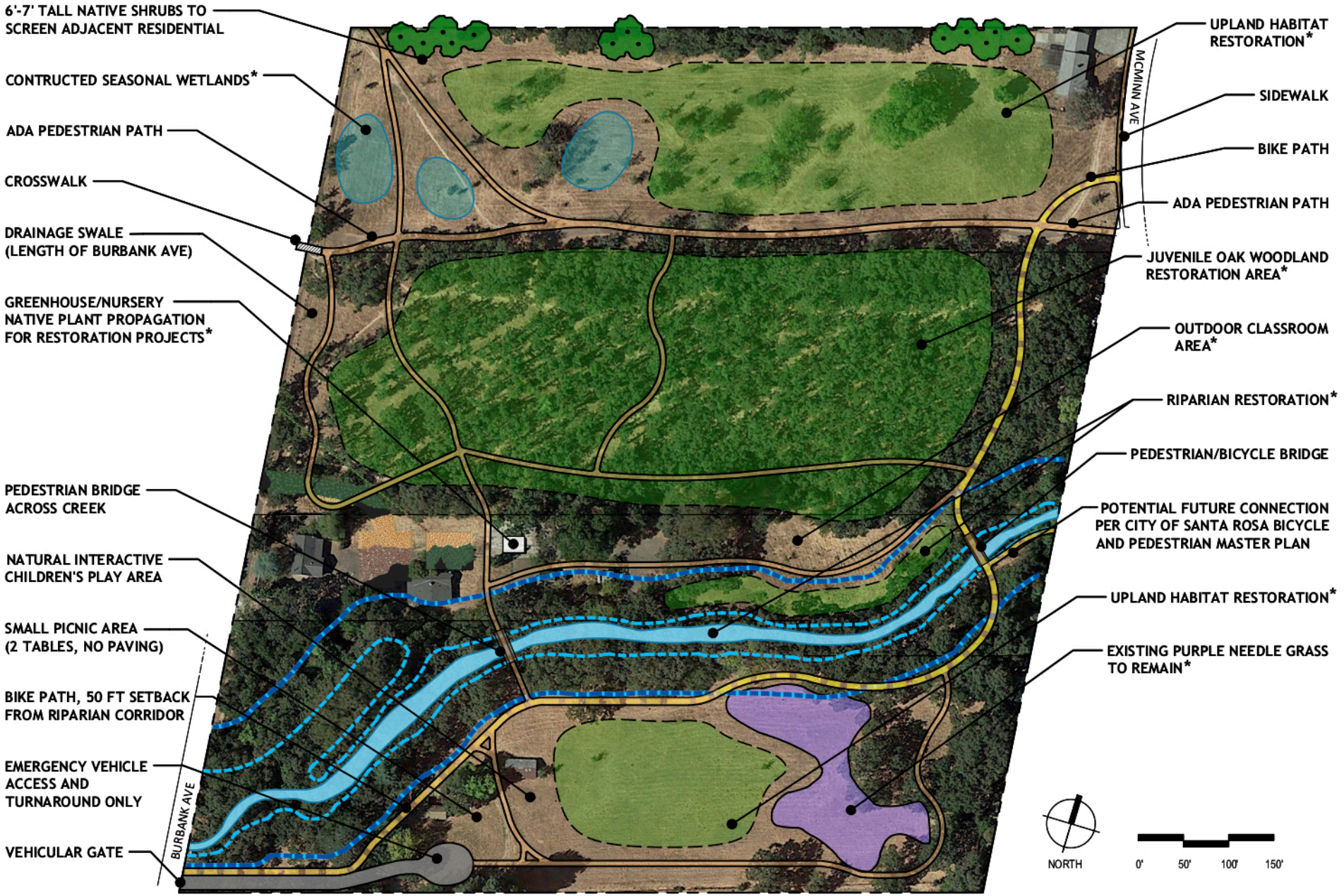
Before the draft was released I submitted an "environmentally superior alternative" for the project in which I call for the project to be an eight point five acre neighborhood park adjacent to an eleven acre nature preserve. Today I submit an "environmentally superior alternative" map for this proposed project also. The draft EIR has not looked at this reasonable alternative which is legally required to be done by the "Final" EIR. Therefore I again point out the Draft EIR is

inadequate for neglecting the previously done comment by me in the appraisal of proposed projects.

The 2010 project which was agreed upon by the community and the city needs to be used in my humble opinion if the city chooses to ignore the desires of the community for a neighborhood park only with a preserve. Many of us residents were bamboozled for a dishonest former city director of the Recreation and Parks Department who met with us and the Santa Rosa City Councilman Gary Wysocky. WE were told the first parcel to be purchased at 1400 Burbank Ave. was absolutely necessary to provide for the bikeway/greenway proposed in the 2004 Roseland Creek Concept Plan. Further he told residents the reason to call it a community park was because the city would seek more acreage to the south to make an at least 40 acre park to preserve nature in Roseland

Last, but not least, the proposal for a Pomo Indian "interpretive" village at the Roseland Creek site is something many residents want. A group of residents are advocating for the entire site to be named Pomo Park and Preserve. The city should honor Pomo at this site.
This short letter reminds you to adequately address my previous letter because it is not there in this Draft EIR my claim is the document is again inadequate. More comments will be forthcoming.

Thank you,
Duane D. De Witt
Duane De Witt
[redacted]



ROSELAND CREEK NEIGHBORWOOD PRESERVE

MASTER PLAN PROPOSAL

JUNE 2024

*TO ENHANCE ECOLOGICAL SERVICES AND EDUCATIONAL OPPORTUNITIES

From: Erika Erzberger [redacted]
Sent: Thursday, June 13, 2024 12:07 AM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] Roseland Creek Community Park

Hello Ms Santos,
I am writing to ask that you please prioritize conservation and restoration in your plans for this area. I visited the Roseland Creek Community Park recently for a plant walk and was rewarded by hearing birds, seeing amazing mature oaks, experiencing multiple habitat types, and even seeing a baby turkey (turkey-let? turkey-chick?). I could sense the uniqueness of this wild place within city neighborhoods. With so much concern these days about access to nature and the health benefits conferred by time in nature, this is special resource for the residents of Santa Rosa.
Transforming this pocket of nature into a traditional city park would be a missed opportunity. Please, keep this land free of roads, parking lots, pavement, lawns, and landscaping. This could be a center for indigenous cultural practices, school biology lessons, forest therapy, and of course plant walks.
Thank you for your consideration.
Warmly,
Erika
Board Member, Milo Baker Chapter of CNPS Sonoma County resident

Fred Krueger
[redacted]

June 9, 2024

Jen Santos
Deputy Director Parks
Recreation and Parks Department
jsantos@srcity.org

Dear Jen Santos,

Thank you for your letter introducing the Draft EIR on the Roseland Creek Park.

This letter is my quick response to the Roseland Creek Park draft Environmental Impact Report and your request for reflection and commentary. I will try and elaborate on these items if I can get this finished this afternoon.

The Draft Report in relation to the local community

This draft Environmental Impact Report is big – over 465 pages long. This includes the formal text, the map reports, the BC Laboratory reports and the memorandum at the end.

Do you think it is reasonable for the City to expect local residents within 45 days (April 25 to June 10) to read through all this material, digest its contents and make our own informed responses in this month and half period? Most of us have full time jobs, sometimes taking up to ten or more hours per day. For most neighbors this is too much to ask.

To express this in more specific terms, Santa Rosa City officials are asking citizens to tour through an average of over 10 pages per day, each day during this response period; digest the implications and develop an informed response back the Santa Rosa Parks and Recreation Dept. This is not fair. In fact you would get much more of a turnout and better citizen awareness, besides being a equitable and just process, if the City would begin with a public introduction to the DEIR along with an oral presentation of the issues and then begin the reflection and commentary on this report. This way you would get a lot more public participation. We are willing, even eager to participate, but citizens need time to process the issues and respond thoughtfully.

Issues that need to be addressed:

Demolition of the footbridge and tree removal on the project site

> See: Impact BIO-1a: Demolition of the footbridge and tree removal on the project site could potentially impact special-status bat species that may use them as a roost, and could result in the direct removal, abandonment, or destruction of the maternity roost.

Why is there consideration of tree removal in what is supposed to be a nature park? Park policy should be to preserve as many trees as possible. They suppress noise, set up a quieting atmosphere and sequester carbon dioxide which is a stated policy of the City of Santa rosa.

We already know that bats are present in the park as they can be observed right before dark on most evenings. Where they roost is not known but we do have a professional bat biologist in the neighborhood who could help address any issues dealing with bats.

From the perspective of the neighbors, the striving of the park should be to preserve as many trees as possible and have no contingency for tree removal.

The Noise Level as Proposed in the DEIR

> See: MM NOI-1.1: "The City's contractor will develop a construction noise mitigation plan to ensure noise levels would be reduced to 80 dBA Leq at sensitive receptors. The construction noise mitigation plan may incorporate, but would not be limited to, the following best management practices."

The DEIR proposes noises up to 80 decibels.

This level is way too high. Medical doctors say that this high level is associated with Noise Induced Hearing Loss (NIHL).

NIHL tends to become a risk at around 70 dB. To have this level in a residential neighborhood is dangerous and would be as assault on neighbors and certainly a nuisance. High noise levels are associated with stress, animosity and Loud noise can create physical and psychological stress, reduce productivity, interfere with communication and concentration, and contribute to workplace accidents and injuries by making it difficult to hear warning signals.
Besides, who would bear responsibility for damages to neighbors' hearing?

See website on hearing: https://decibelpro.app/blog/how-loud-is-80-decibels/

See also OSHA statement on the effects of Noise: https://www.osha.gov/noise/health-effects

Here is an introduction to the OSHA statement on noise:

> Exposure to high levels of noise can cause permanent hearing loss. Neither surgery nor a hearing aid can correct this type of hearing loss. Short term exposure to loud noise can also cause a temporary change in hearing (your ears may feel stuffed up) or a ringing in your ears (tinnitus). These short-term problems may go away within a few minutes or hours after leaving the noise. However, repeated exposures to loud noise can lead to permanent tinnitus and/or hearing loss.
>
> Loud noise can create physical and psychological stress, reduce productivity, interfere with communication and concentration, and contribute to workplace accidents and

injuries by making it difficult to hear warning signals. The effects of noise induced hearing loss can be profound, limiting your ability to hear high frequency sounds, understand speech, and seriously impairing your ability to communicate.

Construction Hours

See: MM NOI-1.1: The City's contractor will develop a construction noise mitigation plan to ensure noise levels would be reduced to 80 dBA Leq at sensitive receptors.

* Limit construction hours from 7:00 am to 7:00 pm Mondays through Saturdays, and 10:00 am to 6:00 pm on Sundays and holidays.

Portions of the park adjoin residential areas. Work beginning at 7:00 AM is way too early for a residential area. There is no need to start so early and continue so late into the evening. Please explain why this is proposed for such an early and/or late a time.

Active Use Master Plan Alternative

See: The Active Use Master Plan Alternative assumes a public gathering area with a restroom and shaded pavilion where the former residence at 1027 McMinn Avenue was located. A semi-circular driveway would be provided from Burbank Avenue in front of the nature center and would provide access to a single large parking lot for the nature center and dog park. A group picnic Roseland Creek Community Park Master Plan xi Draft EIR City of Santa Rosa April 2024 area and dog park would be provided behind the nature center on the 1370 Burbank Avenue property. South of Roseland Creek an expanded turf area would be provided with a picnic area along the southern property boundary and a Pomo interpretive area. This Master Plan Alternative would also construct sidewalk along the Burbank Avenue project frontage, on-street parking, and a bike lane.

This paragraph is poorly written and it is not clear exactly what is proposed. Neighbors in this region have spoken clearly and repeatedly on these issues We do not support active sports inside a quiet nature area. This would obviate the goals and requirements of a quiet nature park.

Artificial Turf

Artificial turf within the park would either be a source of toxic material or an unnecessary drain on water supplies.

The Artificial Turf Field Alternative assumes that the proposed multi-use lawn area would be landscaped with artificial turf rather than grass. The Artificial Turf Field Alternative would use less water during operation of the proposed community park.

It should be recognized that most synthetic turf surfaces contain toxic materials.

Numerous studies indicate that chemicals identified in artificial turf, include polycyclic aromatic hydrocarbons (PAHs), phthalates (a gender-bending chemical), and per- and polyfluoroalkyl substances (PFAS). These are known carcinogens, neurotoxicants, mutagens, and endocrine disruptors.

Please see the National Institutes of Health report on
"Health Impacts of Artificial Turf: Toxicity Studies, Challenges, and Future Directions"
https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10262297/

See the introduction to the statement by the National Institutes of Health. This is an introduction to this issue. The following is only part of the introduction to this issue:

> "Many communities around the country are undergoing contentious battles over the installation of artificial turf. Opponents are concerned about exposure to hazardous chemicals leaching from the crumb rubber cushioning fill made of recycled tires, the plastic carpet, and other synthetic components. Numerous studies have shown that chemicals identified in artificial turf, including polycyclic aromatic hydrocarbons (PAHs), phthalates, and per- and polyfluoroalkyl substances (PFAS), are known carcinogens, neurotoxicants, mutagens, and endocrine disruptors. However, few studies have looked directly at health outcomes of exposure to these chemicals in the context of artificial turf. Ecotoxicology studies in invertebrates exposed to crumb rubber have identified risks to organisms whose habitats have been contaminated by artificial turf. Chicken eggs injected with crumb rubber leachate also showed impaired development and endocrine disruption. The only human epidemiology studies conducted related to artificial turf have been highly limited in design, focusing on cancer incidence. In addition, government agencies have begun their own risk assessment studies to aid community decisions."

Besides serious chemical toxicities, synthetic turf has been documented to reach temperatures over 200°F on a 98°F day. Synthetic turf fields are always significantly hotter than natural grass, concrete or asphalt. These higher temperatures put users of turf at risk for skin burns and heat-related illness.

I might note that obvious issues such as this should be spotted or anticipated by City staff and not find their way into a DEIR produced by professional consultants.

Additionally the auto tires used in artifical turf are now widely known to be deadly toxic to trout and other salminoids. Therefore they should be employed anywhere close to Roseland Creek.

"When tires wear on pavement, the chemical 6PPD is released. It reacts with ozone to become a different chemical, 6PPD-q, which can be extremely toxic — so much so that it has been linked to repeated fish kills." This caveat equally applies to tires used in artifiicial turf.

See the following analysis on the internet by the San Francisco Estuary Institute and The Aquatic Science Institute: "Vehicle Tires Threaten Water Quality."
https://www.sfei.org/news/vehicle-tires-threaten-water-quality

Dog Park

Neighbors have repeatedly declared that they do not support a dog area in this park. This is because those close to the park need to sleep at night and dog parks are notorious for a lot of loud barking and commotion throughout the day and into the night. Witness the uproar caused several years at the park "A Place to Play" by neighbors.

The park is also a place where turkeys nest and where a variety of mammals live and enjoy the woodland quiet. Dogs and wild animals do not easily coexist. School children already use this park for nature studies and they enjoy the chance to see squirrels, sometimes rabbits and birds. The introduction of a dog park defeats all of the valuable natural services that the park seeks to provide.

This proposal would cause neighbors to rise up in uproar over the insensitivity of this concept.

Roseland Creek.

The isues of the creek are not addressed in the present DEIR, yet this is perhaps the biggest issue in the park. The fact that the creek and its many issues and influences are not considered makes this DEIR inadequate as an assessment of the issues of Roseland Creek Park. It should be clear to even the most casual visitor that everything in this park is influenced by the creek which runs down through the very center of the park.

Over seventy years ago, according to old time neighbors, such as Felix and Florence Kemp (1027 McMinn Avenue) steelhead trout used to come up Roseland Creek from the Sebastopol Laguna. This resulted in small rainbow trout fry occasionally being caught by neighborhood youth. At that time ground water levels were higher and certainly cleaner. Our groundwater was clean to drink and supposedly sweet tasting.

Since that time there has been massive ground water overdrafting, particularly by the City of Santa Rosa all across the Santa Rosa plain, and now also by Chelsea Gardens apartments, managed by Burbank Housing – right across the street from the park. As groundwater levels have dropped, by estimate over two perhaps three feet, Roseland Creek has suffered dewatering and now only flows in the winter and early spring months. (Previously this Roseland creek flowed year round).

As evidence of the impact of this decline in ground water, the black walnut trees that Mr Kemp grew at 1027 McMinn Avenue and also his English walnut trees were formerly selfsufficient with ground water. Now that the ground water is dropping all of his English walnut trees have died and the black walnet trees, with deeper roots are all stressed.

This declining groundwater level also jeopardizes the California Tiger Salamander (CTS) and all other wildlife and plant life along the riparian corridor by having caused a dessication of the land and grounds. This decline still continues into the present. For the sake of future water sustainablity, this overdrafting of groundwater should stop immediately as it will continue to cause a deeper dewatering and consequent further dessication and drying of the land and dependent vegetation.

Additionally the City of Santa Rosa, in an apparent effort to speed rain runoff, channelization

efforts took place in the past. This seems to have been an effort to straighten out the creek banks, and this included an attempt to pave the creek channel. Now with the onset of global climate change and the prediction of more episodes of torrential rainfall, this will cause more flooding, both in the park and to neighboring residences. The consequence of these misguided "corrections," the creek now has a reduced capacity to handle large storms. Now every year, and the Water dept. can verify this, we have flooding over the top of the bridge on McMinn Avenue. It is probable that this flooding will cause damages to neighhood housing and this will be known as the result of City manipulation of the creek without awareness of the consequences of this bad management.

The present annual flooding is amplified by the covering of most surface areas by impermeable materials. This now causes excess runoff and in the future it is inevitable that it will cause the sewer system to be overwhelmed causing overflow that is the direct result of iatrogenic city planning and the wrongheaded manipulation of the creek. This is an important issue that begs for correction.

Another major water issue in this area is the pollution of ground water by gasoline, benzene and trichloroethylene. This happened because the City of Santa Rosa failed to enforce regulations on the auto and dry cleaning businesses who dumped toxic cleaning and other waste materials onto the ground and steadily polluted what was peviously pristine clean ground water.

The different issues listed here reflect the burden that local residents endure because of the failure of the City of Santa Rosa to follow sound science and perform due dilegence in stewarding the lands and the issues of quality of life for the citizens of Santa Rosa.

The Environmentally Superior Alternative

> See: "The CEQA Guidelines state that an EIR shall identify an environmentally superior alternative. As described in Section 7.0 Alternatives, the environmentally superior alternative to the proposed project is the No Project Alternative because all of the project's significant environmental impacts would be avoided."

There is something quite positive in this concept. The environmentally superior alternative could be understood to let nature have her way. Over the last two or three years none of the planned development to the park has taken place. Yet, another form of growth has taken place. Wildflowers have exploded in variety and number. Trees have grown in stature and made the park more beautiful and thickly green. The grasses and shrubs are thicker and of a broader variety.

Some animal species have grown in number and a few have strangely disappeared. Now as evening comes over the park, the deep sounds of the Great Horned Owl's hoots float across the forest. Now the rats that once might be found are more cautious even as the owls have grown fat and strong. Turkeys have become abundant, particularly in the central area and so have rabbits and even skunks, particularly in areas not well trod. Strangely the raccoons and possums have disappeared. It is actually all quite beautiful with luxurious plant growth. Neighbors simply walking arrive at many times during the morning and even visitors from outside the area. Every morning hikers tour through the park, many of them students with their parents cut across the park en route to classes. And there are also the occasional homeless adventurers and the indigents.

Could this be the “environmentally superior” alternative which the authors of this DEIR refer to? Probably not but this still remains a nice thought that would still benefit many of our neighbors who are regularly seen strolling through this nature park.

Now Sunday evening is coming to a close and I have other duties still to address. But this is not yet done. I will supplement this beginning response with other thoughts.

Sorry I don’t have enough time to get this finished this evening.

If you have any questions, give me a call. I am usually in my office at least til 9 pm most days.

My best to you and all your work,

Fred Krueger

[redacted]

Fred Krueger
[redacted]

June 14, 2024

Jen Santos
Deputy Director Parks
Recreation and Parks Department
jsantos@srcity.org

Dear Jen Santos,

Thank you for your note indicating that you received my first set of comments. I ran out of time with that first edition and here are further insights that I did not have time to include. Here are a few additional comments on the Roseland Creek Park draft Environmental Impact Report for reflection and commentary. See the attached *.pdf version for a formatted text.

The Potential for Fires

The Roseland Creek park grounds over the past two or three years have witnessed remarkable growth in its trees, brush and grasslands. This is a welcome development because the increased biomass density brings a stronger natural presence to the area. To protect this growth, there needs to be intentionality in ensuring fires do not erupt.

A 2023 study from Cal Fire on the causes of fires shows that 95+% of fires are due to human accidents, particularly vehicle sparks, smoking, cooking and electrical equipment. Statewide the remaining fires are due to fork lightning or rarely arson. Fork lightning is rare in the Santa Rosa region as we typically have sheet lightning in our coastal region.

Over the past ten years this woodland area has witnessed several fires, every one of which comes from cooking, smoking or some other illegal activity. This means we need to be very careful of picnicing in the park as this is potentially hazardous.

Similarly, smoking needs to be prohibited in the park. It is just too dangerous even though many of the homeless who frequent the park are smokers. So is driving over the dry grass by vehicles as mufflers can ignite fires. All vehicles in the park should stay on designated roadways, or they too can be a cause of fires.

Roseland Creek

The history of this creek from free flowing year round to a dry streambed over half of the year reflects on the continual overdrafting of ground water. Streams and ground water constitute one body of water, manifesting in different formats.

The biggest cause of overdrafting is the City of Santa rosa, followed by the local vineyards, then local lawn watering such as that by Chelsea Gardens on McMinn Avenue and other properties managed by Burbank Housing.

Roseland Creek influences much of the area in the proposed park area. Fortunately a former employee of the City of Santa Rosa, Rhianna Frank has developed a Masters degree report while at the University of San Francisco with a focus on groundwater on the Santa Rosa Plain. See "Sustainably Managing Groundwater - Surface Water Interactions within the Santa Rosa Plain Basin," by Rhianna Frank, Fall 12-14-2018, https://repository.usfca.edu/cgi/viewcontent.cgi?article=1976&context=capstone

Rhianna quotes Senate Bill 1319 (2014): Senate Bill 1319, introduced by Fran Pavley that requires local agencies to adopt and implement a groundwater management plans (State of California, 2014). The plan must contain specific components that meet state defined sustainability objectives tailored for the basin within the SGMA timeframe. She also observes how "Overdraft caused by groundwater pumping results in surface water depletion for seventy-five percent of California's rivers and streams" (5.1).

She observes how depletion of groundwater levels is the root cause of lowered groundwater levels, reduction of groundwater storage, water quality degradation, land subsidence, and in some cases the depletion of interconnected streams and seawater intrusion. Most of us in the Roseland area already see the effects of surface subsidence in the cracking of house foundations. Repair is expensive. The draft EIR did not examine these issues in preparing its report. Yet this increasing dessication will dry the trees and plants in this park and cause other consequences of drying, not examined in the DEIR.

This is another area where the present DEIR is inadequate.

She also points out the following about the root depth of plants in an area:

> Root depth of groundwater dependent vegetation provides necessary evidence in determining if the ecosystem is impacted by depleted groundwater resources. Each type of vegetation has a measurable root length average which sets a minimum threshold for groundwater levels. For example, if a specific groundwater dependent plant has historically grown in the area and is known to have a maximum root length of fifteen feet then this species of plant will begin to exhibit signs of impact: reduced growth, reduced reproduction and increased mortality— if the groundwater levels exceed fifteen feet below the surface. Root depth data should be established locally since there are regional differences that can have varying effects on root length. Studies need to be conducted within the Santa Rosa Plain Basin to determine the maximum root length of the groundwater dependent vegetative species with the shortest

expected root length. This information is critical in determining the minimum threshold for this criterion. Figure 20 is a flow chart of the range of changes in plant physiology, ecophysiology and ecology that is associated with various durations of water stress (Eamus et al. 2016).

Neighbors already know that groundwater levels in Roseland are dropping. Some of the trees in Roseland Creek park depend on that groundwater to survive. How much of an issue this might be will require some study, but this issue was never addressed in the DEIR.

The Forest woodland

Generally, the quality of the park will be maintained to the degree that we are able to preserve and protect all of the trees. The trees are the key to maintaining the ambience of the park. Over the past three years while plans were delayed, a wonderful period of growth in the neighborhood forest took place. The effect of the forest for the neighborhood is one that is cooling, quieting of city sounds, peace-making, all while silently sequestering carbon dioxide as it partially counteracts the effect of fossil fuels on the City's carbon debt.

Noise and Crime Abatement through the park

It is well known that noise pollution can cause health problems for people and animals. From traffic noise to music concerts, loud or inescapable sounds can cause hearing loss, stress, anger and even heightened blood pressure levels. In contrast quiet in a neighborhood park or spending time in quiet places helps calm the mind and reduce the unhealthy effects of these noise intrusions.

The Roseland area is recognized by the SR Police dept as a place with considerable gang activity. However, strong evidence exists that high-quality green spaces in residential environments are important for public health promotion. This is because both availability and quality of green spaces has positive and significant associations with park use. Quiet in the park will be important for its benefits to flourish. This should mean the prohibition of artificial methods of sound amplification and noisy events.

The National Library of Medicine (NIM) provides important findings about quiet nature parks as a means for crime abatement. This analysis provides important documentation of the value of a nature park as opposed to a play park. When the Roseland neighbors learned this fact early in our research around 2002, this helped us determine the type of park we wanted. This was decisive information for neighbors:

See these findings at: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6950486/

‘The Impact of Green Space on Violent Crime in Urban Environments: An Evidence Synthesis”

Can the presence of green space in urban environments reduce the frequency of violent crime?

To ascertain the evidence on this topic, we [NLM) conducted an in-depth literature review.... More than 30,000 potential paper titles were identified and ultimately, 45 papers were selected for inclusion. Green spaces typically comprised tree cover, parks and ground cover. Criminal behaviors typically included murder, assault, and theft. The majority of the research reviewed involved quantitative methods (e.g., comparison of green space area to crime data). We extracted multiple mechanisms from the literature that may account for the impact of green space on crime including social interaction and recreation, community perception, biophilic stress reduction, climate modulation, and spaces expressing territorial definition. Recommendations are made for future research, such as meta-analysis of existing data and the development of grounded theory through qualitative data-gathering methods.

By providing evidence that access to nature has a mitigating impact on violence in urban settings, city governments and communities are empowered to support these interventions....

The positive impact of nature and green space on human health and well-being has been documented by over 100 studies, including several literature reviews and meta-analyses which have examined the benefits of the nature connection. Several researchers have begun to explore the relationship between nature and urban crime, focusing on outcomes such as reduced aggression and improved community cohesion. Multiple new papers and dissertations have been published in the last three years, and an expansive update is essential to setting future research agenda.

It is now well over twenty years since the neighborhood associations in Roseland realized the great benefits of a nature park over other forms of parks. Former SR Parks and Rec. director Mark Richardson realized these benefits and supported the goal of a nature park, which was originally characterized as an urban wilderness park. After the 2009 budget shortfall a change in management took place, and then without institutional memory within the Parks and Recreation Dept. Roseland, neighbors had to defend their goal of a nature park with newsletters to local residents and dialogues with the new generation of SR Park and Rec. staff.

Other Issues

There is a tendency among local residents to dump trash onto the park grounds. Penalties should be established to end this tendency.

Students use the park daily as a thoroughfare to the school on Burbank Avenue. They frequently drop plastic wrappers and other non-recyclable materials along the pathway. Trash recepticles are needed to maintain a clean and trash free park. Also education about the importance of a litter free environment.

A tendency also exists for the homeless to seek campsites in the park whenever locations along the Joe Rodota Trail become closed. The reason is that the park is a beautiful location, and no restrictions exist to suppress drug use, late night parties, campfires or other activities. Trash is a typical result of their presence in the park area, as well as drug paraphenalia, liquor bottles and worse. The solution should be to have an evening sweep to remove campers daily. The sign by itself is not sufficient as the signs tend to be ignored.

Vehicles

Cars and trucks occasionally drive onto the grounds as there are no longer any hinderance to their entry onto the grounds. Vehicles bring camping gear, cooking equipment, chairs and wide variety of other forms of trash. The Park grounds need some form of security against vehicle entry. The previous chain provided some protection and that should be reinstalled. The prohibition should exclude cars and trucks, electric bikes and scooters; bicycles should use established paths. All of these pathways should be with permeable surfaces to maximize groundwater absorption.

It is quitting time for me, so I will conclude this second set of comments at this point.

Thank you for considering these issues in plans for the Roseland Creek Park.

My best to you and all your work,

Fred Krueger

From: [redacted]
Sent: Monday, June 17, 2024 1:58 PM
To: Santos, Jen <JSantos@srcity.org>
Cc: Chris Coursey <chriscoursey@sbcglobal.net>; Alvarez, Eddie <EAlvarez@srcity.org>
Subject: [EXTERNAL] Re: Further Comments on Draft EIR on Roseland Creek Park

Fred Krueger
[redacted]

Monday, June 17, 2024
Jen Santos
Deputy Director Parks
Recreation and Parks Department
jsantos@srcity.org

Dear Jen Santos,

One last set of notes on the Roseland Creek Park draft Environmental Impact Report. This will address issues not previously elaborated upon in previous commentary.

The ecosystem within the park includes an opportunity to showcase as aspect of what the original natural flora and fauna looked like prior to the arrival of Europeans in this area inside the City. After several years of growth and untouched natural development, the park land has increasingly become a beautiful area of wildflowers and lush grassland, second growth oaks and other trees, and especially small animals and native birds.

Children who visit the park and students delight in seeing the squirrels, rabbits, and turkeys which are abundant. An attempt should be made to manage the area as a whole ecosystem, making efforts to protect the animal population. There are also occasional raccoons, possums, skunks and arboreal salamanders and a few snakes. Once in awhile a deer can be found in the park, and increasingly visitors are arriving at dusk to hear the great horned owls who live in the tall trees in the central area of the park.

To maintain a park with an abundance of wildlife, artificial noise levels have to be kept at a minimal level. Animals and loud noise are not compatible. The same is true about noise for most humans.

The field of nature therapy is still in its infancy, yet according to WebMD, Nature therapy, also called ecotherapy, is the practice of being in nature to boost growth and healing, especially mental health. More and more research suggests that spending time in natural environments is linked to a variety of mental health benefits. For example, being in a green space has been linked to less anxiety, fewer depression symptoms, and lower stress levels. Spending time in nature helps people with depression and kids with attention problems think more clearly.

"One of the top benefits that we address are for people who are trying to reduce anxiety or depression and increase relationship and connection," Dr. Lung says. "I also think it's super engaging, so for kids and teenagers ... [and] for people who are reluctant to be in therapy."

Patricia Hasbach, PhD, a licensed professional counselor and clinical psychotherapist, is another expert in ecotherapy. She recalls one such person, a patient in a cardiac rehabilitation center, who was reluctant about therapy. "He was pretty nervous about talking with me and I suggested, 'You want to just take a walk outside?' And I just noticed how his voice changed," Hasbach says. "He become more relaxed ... and that was my first 'aha' moment that there's something here that I need to pay attention to."

Researchers have studied nature's healing list a number of benefits, including:

- ADHD
- Dementia
- Lessened pain
- Lowered stress
- Medical recovery
- Mood modification
- Obesity
- PTSD

The DEIR does not engage these possible benefits to the Roseland Creek Park, and yet this region of Santa Rosa contains a lot of wounded young people who would benefit far more from the benefits of clean nature than simple athletics or pedestrial entertainment. These benefits should be considered just as much as traditional forms of park use. Here is an opportunity to help pioneer a benefit to urban young people that is just now

coming into wider realization by the medical community and park management leaders.

As a leading psychologist observes, "[It's about] noticing what's around you and increasing our own awareness of ourselves in relation to our world and environment," she says. "Just the symbiotic benefits of being outside."

My best to you and your work,

Fred Krueger

From: Gemma Villasenor [redacted]
Sent: Monday, June 10, 2024 4:52 PM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] Proposed Burbank ave park site

Hello,

My family and I live just right down the street from the proposed site. I believe that while a park is a nice idea, unfortunately the way things are going it would just be a waste of money because the population it is designated for are not able to use it due to the drugged homeless population that roams the streets. In addition, there is another park right down the street off of Hearn and there is A LOT of traffic as well as a big group of people who are there at all hours just day drinking or smoking marijuana. I think the land should just be preserved as is. Additional apartments would also cause more traffic than there is in the morning and in the afternoon with everyone commuting to and from the schools in the area. I think having a nice area to just roam in nature and observe is more essential for children.

Gemma

-----Original Message-----
From: Gerald Rickard [redacted]
Sent: Monday, May 13, 2024 11:46 PM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] Roseland Creek community Park

Just call this park the neighborhood WOOD or WOODS.

Take two out of three saplings bunch together and open up the space a little

Ask a tree company to donate eucalyptus or bay tree chips as they smell nice and last a long time

Put them on the path

Take out the curb on McMinn so I can ride my bike in there without stopping to lift it over the curb.

Strategically locate six heavy duty picnic tables made out of wood, not cement.

From: Hunter Scott [redacted]
Sent: Sunday, June 9, 2024 3:20 PM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] Comment RE Roseland Community Park DEIR

Hi Ms. Santos and Santa Rosa City Leaders,

I would like to submit my support of the City's plan for the Roseland Community Park. As a resident of the McMinn neighborhood, I'd urge the city to move forward with the current plan or any of the alternatives, except for the "no project" alternative, that will result in no further delays to building the park. I'd like to also submit my opposition to the "no project" alternative, given the findings and comprehensive mitigation plans proposed in the recently released Draft EIR. The community will benefit greatly from a neighborhood park, especially one as well designed as what can be found in the City's plan. People in the neighborhood already use the space as an "unofficial" park. Without amenities that would come with a park such as trashcans, restrooms, parking spaces, and paved paths to support and manage activities that are already happening, the area will continue to accumulate trash and become degraded. The "no project" alternative will result in more environmental harm, not less, and further delays will also not serve the neighborhood well. Please move forward quickly with constructing this park, with whichever alternative will make it happen most quickly.

Thank you,

Hunter Scott
[redacted]

From: Jennifer Deihl [redacted]
Sent: Monday, June 3, 2024 6:05 PM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] Re: Roseland creek project

Good evening!
My name is Jennifer Deihl. I'm a homeowner on Rose Meadow Ct in Roseland. I'm also a mother of a nature loving toddler, an avid hiker, cyclist and an owner of a big dog who loves long walks.I used to load up the boys, stroller etc and head to one of the regional parks to get our fix of exercise in nature. About a year ago after strolling through the residential areas surrounding us; we discovered the Roseland and Colgan creek trails! I actually obtained a neat map at an event held for the community at Bayer Farm. While we're right by Bayer Farm, and as much as we treasure it, it doesn't offer the same experience for large dog owners and those looking to be immersed in nature while getting a long walk in. Being able to escape the busyness of development and hear birds and animals in their natural habitats was a game changer. We now regularly; at the very least once a week, make a minimum of a 3 mile loop through these areas by foot or bicycle. This morning, I met a kind neighbor who brought to my attention the approaching decision on whether or not to clear the area to make a soccer field. It motivated me to reach out and plead for the preservation of this special wildlife area. It is so dear to us. With the existing schools, and southtwest park being nearby, I think this undeveloped area is so necessary to protect.In an area so prone to gang activity its crucial to have an area that feels like Sonoma county in all its greatness accessible to my son and growing family.
Thank you for reading and I wish to stay informed of further public decisions in my area.
Warmly,
Jennifer Deihl
Sent from my iPhone

From: John [redacted]
Sent: Monday, June 10, 2024 8:47 AM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] Roseland Creek Community Park, DEIR Comments

Hello Jen Santos

Thanks for the opportunity to share some of my thoughts one more time. Being a long time construction guy, I respect the park's design and process getting to this point, and how thorough this EIR is. I'm sure it will also be a tricky build.

I'd like to first comment on proposed work hours stated in MM NOI-1.1. These work hours should not be 7 days a week, but rather, 5 days with weekends and dinner time & later, off. There's a couple schools across the street, and it's surrounded by neighborhoods. Work hours affecting the project should be agreed upon rather than just stated.

Regarding the Project Alternatives, I've voiced my opinion many times over the last 20ish years. My first choice is the No Project Alternative. It doesn't mess with what is already a pretty good thing.

As a second choice, I'd prefer the Neighborwood Master Project Alternative, but with a grassy spot south of the creek for families and visitors to run around in.

The city's proposed and approved master plan, 2.2-4, still has some key flaws, and I'll comment below, loosely following the order of the draft as written.

2.2.2.1. I respect the design of the parking lots being shoehorned into the trees and the creeks buffer zone. But why wouldn't some simple street parking be chewed into the park across from the elementary school's parking lots? It would be what I assume is a city standard such as what they did at Burbank Ave & Liana Dr a few years ago, making a simple parking lane. And, why not city standard curb and gutter and sidewalks @ the entire perimeter? The scenic road designation has already been violated by the schools and the multi family builds occurring now down the block.

Regarding the amount of paving or concrete to occur in the park, I get it that it's required for ADA paths of travel and parking, and called out as the yellow dotted 'multi use trail', however let's please not pave 'roads' throughout the remainder of the park. The 'network of smaller trails & walkways' should be compacted permeable gravel, and minimalistic at 4 or 5' wide, based on my personal municipal building experiences. The goal is to not disturb the nature as much as possible it would seem. A shady walk or jog in the trees or grasses.

2.2.2.2 I have some HUGE issues with the plan for the south of the creek: the small 2nd restroom and barbecues! This area is designated per 3.0-2 as 'within the wildfire hazard zone'. Therefore, no fires! That restroom tucked back 3 or 400 yards away from the road's prying eyes, and behind the heritage trees, spells nothing but trouble to me. I can't imagine anything but dilapidated motor homes populating that tucked away parking lot. And the school kids will be trying to enjoy that area as well. Oh boy.

A solution would be to down size to only the nature center restrooms, perhaps with a couple more stalls added if required. Plenty of visibility there. The picnic areas could be connected to it via another ADA upgrade path of travel over the bridge. There are certainly parking management issues ahead.

Figure 2.2-3 is 6 years outdated. Google maps currently shows the reason why gridlock on Burbank Ave has become so horrible. Another school, and more high density development. Table 3.0-1 also helps point out the hundreds of new homes just within walking distance, not to mention the thousands other homes listed in the city's "Santa Rosa's Affordable Project Pipeline". I feel this EIR should also address Burbank Ave's gridlock, especially at school drop off and pickup times. No one will be able to drive to, or exit from this park when it's those times. Sebastopol Rd, Hearn Ave, Dutton Ave all have this same gridlock issue, although it's not all attributed to schools. I'm having a hard time wrapping my head around all the greenhouse gas emissions, or the PG&E power plant's emissions needed to power all the electric cars, all idling away in the name of affordable housing. And there's no infrastructure upgrade

been done to accommodate the thousands of new dwellings. Yes, Sonoma Clean Power is all renewable energy as is mentioned later in this report.

2.4 So much of the creek's bottom in the park is concrete, as well as concrete walls. Didn't the Sonoma County Water Agency approve that in the past? Could not Sonoma Water bear some responsibility now for its removal and possibly flooding. There's a huge flooding problem here, as McMinn Ave is typically flooded and impassable at the creek at least a few times per year. The city had its survey crew in the neighborhood for about 3 weeks mapping and checking elevations this spring. The creek flows better behind the Roseland School District offices, once it becomes channelized.

Impact AES-2 I've stated earlier my thoughts regarding the hidden restroom and its attached parking lot. I'd like to see more heritage trees remain, and street parking used instead. Access south of creek from over the bridges. School parking lots are empty on the weekends and after hours also.

Impact AES-4 Lighting shouldn't be required in a dawn to dark only locked park. If necessary, only at the nature center structure for a drive by security check.

Finally, my children and now grandchildren have played in that park for 39 years, just as it is. I've walked my dogs there for even longer. The school kids and walkers and dog walkers all make the park a lively and social experience. Along with the others who live close enough to the park to walk there, we've cleaned and monitored and enjoyed it for many years. Hoping for a sensible park build. Thank you,

John Murray

From: jorge inocencio [redacted]
Sent: Monday, June 17, 2024 5:00 PM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] feedback on Roseland Creek Park DEIR

Hello Jen

I am writing to provide feedback on the draft environmental impact report for the Roseland Creek Community Park.
I am in favor of the City's proposed master plan and I think that the DEIR does a very thorough job of describing
and offering mitigations for any potential environmental impact. I think that the DEIR addressess all of the concerns
from the community regarding environmental preservation.

Thanks,
Jorge Inocencio

Judy Johnson

[redacted]

June 15, 2024

Jen Santos, Deputy Director, Parks
Recreation and Parks Department

jsantos@srcity.org

Re: Roseland Creek Community Park Master Plan
Draft EIR SCH No. 2022080148

Jen Santos –

Please consider changes to the City's plans for Roseland Creek Community Park that will focus on the land and its life. I refer to the letters and comments from Janet Cobb of the California Wildlife Foundation, Angela Moskow of the California Oaks Program, and Trish Tatarian of the California Native Plant Society. I am not a professional or scientist, just a human being who lives here and very much cares about our land, as do many Santa Rosa residents.

The Park must not be a profit center, event venue or recreational park. This is a struggling remainder of the very special habitat that was the Santa Rosa plain and laguna. All that is needed is to help reverse the human damage and provide a healthy, peaceful area for people to walk, be calmed and refreshed, and connect with nature.

How fortunate this is near schools, where kids can discover, enjoy and learn to protect habitat. The next generations are becoming acutely aware of the importance of and the destruction of nature. Many are losing hope. This park, in their own neighborhood, can provide a positive and dynamic early step in caring for Earth. They don't need a "nature mall". All that is needed is minimal paths and some benches. It should be eyes on, not hands on.

The Santa Rosans living near Roseland Creek Park vary. Some cannot easily access or afford the time to visit the larger parks in the area. Some came to this County and this City to be near the special environment. Some have no clue what the indigenous land was like. Many want a respite from the endless noise, buildings and concrete, if only for a little while. And they don't need a "nature mall", either. So no parking lots, kiosks, BBQ pits, picnic areas, playing fields…. The non-human creatures also need quiet and privacy to flourish in their home.

Of course, work needs to be done on the plot. Get rid of the old pavings and foundations. Don't add more paving. There is plenty of street parking for those coming any distance. Get the garbage out, garbage and recycle bins in. The woods and grasslands need invasives removed and native species reintroduced. Some trimming is needed, but no logging, and no landscape architects need apply. Once repaired, there is no need for roads. It is a small area. Can it please be a quiet, healthy part of the plain to be visited and appreciated? We will help.

Please act responsibly for the long term. The days of "someone else will take care of it" must be over. Here is your opportunity to be an example.

Thank you for allowing me to have my say.

Judy Johnson

Jen Santos
Deputy Director of Parks
City of Santa Rosa

Re: Comments on the DEIR for Roseland Creek Community Park

June 15, 2024

Dear Ms. Santos,
Please accept my comments below and acknowledge receipt by the June 17, 2024 date.

I am a resident of Santa Rosa for over 26 years who appreciates the value of our beautiful parks, open space, and connection to nature as a parent of two grown children. I have walked the 20 acre parcel to be Roseland Creek Community Park and strongly support this land to be protected in its natural state with restoration of priority areas to allow native plants, wildlife, and people to thrive.

I believe a unique approach is needed to provide the great benefits to residents of Roseland, the general public, the plants and wildlife who live there as well as ecological services such as groundwater recharge. The northern meadow, juvenile Valley Oak woodland, Roseland Creek, and the Purple Needlegrass area in the south need to be addressed specifically to preserve and protect their value as well as comply with CEQA and the City of Santa Rosa Creek Master Plan.

<u>The EIR is inadequate in addressing invasive species removal.</u>
The Creek Master Plan identified many invasive species that need to be removed prior to creation of park amenities. These species include Himalayan blackberry (Rubus armeniacus), cherry plum (Prunus cerasifera), hawthorn (Crataegus monogyna), wooly cotoneaster (Cotoneaster pannosus), harding grass (Phalaris aquatica), Mediterranean barley (Hordeum marinum ssp. gussoneanum), reed fescue (Festuca arundinacea), ripgut brome (Bromus diandrus), slim oat (Avena barbata), French broom (Genista monspessulana), Indian teasel (Dipsacus sativus), hairy cat's ear (Hypochaeris radicata), Italian thistle (Carduus pycnocephalus ssp. pycnocephalus), periwinkle (Vinca major), fennel (Foeniculum vulgare), poison hemlock (Conium maculatum). The Roseland Creek southern part is severely impacted by harding grass dominance (Phalaris aquatica). This invasive weed is very pernicious and requires a comprehensive plan to eradicate, which will require long term monitoring. With removal of invasive species, the native forbs, grasses and shrubs will be able to recolonize successfully. This should be specifically addressed in the EIR for all invasive species present.

<u>The EIR is inadequate in addressing the need for the restoration of Roseland Creek.</u>
The removal of approximately 400 linear feet of concrete in the creek channel is necessary to comply with the Creek Master Plan. As a central part of the new Community Park, the concrete removal, invasive and other non-native plants, and restoration with native riparian plants grown locally, this part of Roseland creek can be safely enjoyed by the public while providing flood

control and wildlife habitat. This restoration plan must be considered in the EIR. Restoration of the creek will provide habitat corridors, natural areas in the neighborhood that allow animals to move throughout areas and get much-needed habitat. A restoration plan should be included in the DEIR as part of the planning process.

The large, mature, valley oaks along Roseland creek, combined with the juvenile valley oak woodland provide a natural resource once commonly found in the Roseland area which is now severely reduced by development. To illustrate the habitat value and benefits of valley oaks (even without bears or deer present) I present the following:

" Valley oak trees are a keystone species - a species on which many other organisms in an ecosystem depend, such that if it were lost the ecosystem would change drastically. Valley oaks support approximately 300 animals, 1,100 plants, 370 fungi, and 5,000 insects and invertebrates. Bears, black-tailed deer, scrub jays, magpies, wood ducks, wild turkeys, quail, flickers and acorn woodpeckers all depend on oaks for food. Insects feed on the leaves, twigs, acorns, bark and wood of oak trees (which in turn are food sources for other larger critters.) Some animals depend on oaks to keep them safe from predators, while others use the branches, cavities, and bark itself as a home. Oaks continue to be useful to wildlife even after they die. Salamanders, worms, snails, termites and ants live in decomposing logs and help turn wood into humus, which enriches soil." Source: Napa County RCD https://naparcd.org/wp-content/uploads/2017/10/1-Introduction-to-Oak-Ecology.pdf

The EIR is inadequate in that it did not cite the 2014 Citywide Creek Master Plan (CCMP) Appendix C Roseland Creek Restoration Plan and state how the park Master Plan will incorporate the Restoration needs of Roseland Creek. The CCMP identifies the following: "Construct a self-maintaining channel with adequate bank-full dimensions to transport sediment, contain healthy riparian vegetation and convey the 100-year flood."
This inadequacy should be addressed before construction of any Creekside amenities. The Roseland Creek Master plan cites the following Santa Rosa General Plan Policies:
OSC-D-7 Rehabilitate existing channelized waterways, as feasible, to remove concrete linings and allow for a connection between the stream channel and the natural water table.
OSC-D-8 Restore channelized waterways to a more natural condition which allows for more natural hydraulic functioning, including development of meanders, pools, rifles, and other stream features. Restoration should also allow for growth of riparian vegetation which effectively stabilizes banks, screens pollutants from runoff entering the channel, enhances fisheries, and provides other opportunities for natural habitat restoration
There is no discussion in the EIR that these policies will be implemented for this park.

Also affecting the Roseland Creek riparian habitat is the plan to build a parking lot in the southern portion with 17 spaces. Due to the proximity of the creek at the SW corner, the narrow entrance off Burbank Ave leaves limited space between the creek and the area planned for the parking lot. An entrance road with handicapped parking and a turnaround would be better suited for this part, with the parking located north of the creek. Also, the addition of a large turf area, sports courts, and playgrounds are not all appropriate for this small space, and there is

potential for adverse effects on the Purple Needlegrass sensitive area in the SE corner. Therefore, walking and bike trails, picnic areas, and natural playgrounds would be best for this space. A fitness circuit could be installed without too much impact to the natural vegetation. The nearby schools and other community parks nearby have sports courts and turf sport facilities.

The EIR is inadequate in addressing the restoration needs of the entire park regarding invasive species removal and monitoring The northern meadow has a significant invasion of Harding grass (*Phalaris aquatica)*. The Purple Needlegrass area in the SE corner may also be negatively impacted by the planned adjacent turf area, which will have to be mowed. Lawn mowing equipment can often transport and spread weed seeds, which will impact the native grasses. There should be some separation of the irrigated turf area and the Purple Needlegrass area, with either a berm or a buffer zone, such as a native plant landscaped area, to avoid weed introduction and overwatering. Any plan for the undeveloped area south of the creek should specifically address the invasive Harding Grass present on site and restoration using locally jsourced grasses and forbs should be implemented.

Finally, the paths proposed for the park are excessive in width, at 10 feet wide with a 2 ft gravel shoulder on each side. I propose the roads to be 8 feet wide, which is adequate for maintenance and will save money on materials. This change will also allow for more surface area for rainwater percolation and groundwater recharge.

This 20 acre parcel is unique in the neighborhood and in Santa Rosa. A remnant, regenerating Valley oak forest surrounded by development, it provides highly valuable natural resources to native plants and the animals who depend on them. A community nature park here, mostly undeveloped and restored where necessary, provides access for children to walk to school, for teachers to teach about oak woodlands and riparian habitat, for families to see wildflowers and birds, and for recreation such as dog walking, picnicking, and unstructured play in the neighborhood and for the City as a whole.

Thank you for accepting these comments.

Sincerely,

Lynn Houser, B.S. Botany
[redacted]

Madrone Audubon Society
INCORPORATED

Transmitted by email 06/05/2024

June 5, 2024

Jen Santos
City of Santa Rosa
55 Stony Point Road
Santa Rosa, CA 94510

Re: Roseland Creek Community Park – Draft Environmental Impact Report – Comment

Dear Ms. Santos:

We are writing to share our impressions and requests regarding the Draft Environmental Impact Report (DEIR). Madrone Audubon is headquartered in Santa Rosa and continues to enjoy a productive and positive relationship with the City of Santa Rosa. Our nonprofit Audubon organization is also a Chapter of National Audubon. Madrone Audubon serves approximately 3000 members in Sonoma County and the Bay Area.

You may recall we have taken an active interest in both the longstanding advocacy for acquisition with conservation of the Roseland Community Park parcels and subsequent planning process. Our interest has been in a balance of protecting and enhancing this ecological reserve with appropriate passive recreation for community members. We shared discussions about a possible environmental task force, offering to lead that, to convene our County nonprofit organizations, sharing in activities and education for this special Nature Preserve in the making. The building to remain on-site was considered as a "Nature Center."

Like many, we were disheartened and deeply concerned about the outcome of the park design, which included multiple impactful elements in the supposed context of conserving, restoring and enhancing the wild acreage to support habitat, species and the ability to provide an educational Nature area. Indeed, this land should be considered local critical habitat.

We agree that a formal Environmental Impact Report to document and assess attributes and impacts was both appropriate and needed.

During the public review process, prior to obtaining the DEIR, your City staff and elected officials heard multiple comments from residents and students about the very strong desire to ensure protection of the oak woodland, creek and riparian corridor, grassland and overall habitat. We also heard concurrent support for appropriate passive recreational opportunities that would fit well within the context of an ecological reserve.

When I first visited the Roseland Creek property, I observed a large active Red-tailed Hawk Nest high in a tree on-site. This was a remarkable observation. With many site visits in the past 8 years, even with some detrimental activities occurring on the property, the importance of the Roseland Creek property as the ecological reserve it continues to be, with potential for quiet passive enjoyment and habitat protection and enhancement, cannot be overstated.

Our DEIR review and comments will focus on supporting this continuing experience and opinion by discussing Biological Resources.

In the midst of Roseland, across from Roseland Creek Elementary School, with nearby residences, the Roseland Creek Community Park land is described as follows:

"Seven biological communities were identified on the project site (refer to Figure 3.4-1). Nonsensitive biological communities include non-native grassland, developed/landscaped areas, and disturbed valley oak woodland. Potentially sensitive biological communities observed on the project site include intermittent stream (Roseland Creek), valley oak riparian woodland, riparian wetland, and purple needlegrass grassland, all of which are detailed following Figure 3.4-1.
bio resources"… (p. 38)

The variety of habitat types, including the creek with riparian corridor and possibility for ongoing restoration, also reflect the biological resources/species who rely on this area for survival as well as the City of Santa Rosa securing this habitat in a climate crisis where all we can do to support species survival is very important. Your Santa Rosa students from elementary to high school age will understand your positive action in this regard - if you make decisions to support high level conservation. Educational opportunities as well as community volunteering will help connect community members to their ecological reserve – and conservation that is needed will occur. It is not an understatement to say the City of Santa Rosa and the Roseland community can cultivate and support a world-class Nature Preserve while also providing passive recreational amenities for residents of the community.

We encourage you to review and consider the opinion and report of Shawn Smallwood, Ph.D., his report filed from 2021. Dr. is a highly reputable biologist whose observations, analytical and reporting skills are skills are excellent and reliable. Through his report, comparing to the WRA report(s), you will gain insights as to accurate representation and documentation of biological resources on the Roseland Creek Community Park property. Dr. Smallwood's September 2021 report includes:

"…While visiting the site, I detected 38 species of vertebrate wildlife, 5 of which were special-status species (Table 1). The site supports oak titmouse, of which there are many, and Anna's do hummingbirds (Photos 8 and 9). I saw Nuttall's woodpeckers and a colony of acorn woodpeckers (Photos 10 and 11), Pacific-slope flycatcher and black phoebe (Photos 12 and 13), California scrub-jays and mourning doves (Photos 14 and 15), hooded orioles (Photo 16) and turkey vultures (Photo 17), among other species. I also saw invasive species, including wild turkeys and Eastern fox squirrels, both species of which were introduced to California from their natural ranges east of the Mississippi River, and a house cat on the hunt (Photo 18). Occurrences of non-native species, and more explicitly the ratio of non-native to endemic species, reflect on the ecological integrity of a place (Smallwood 1994). In the case of Roseland Creek Community Park, the ratio of 3 non-native to 35 endemic species of vertebrate wildlife, or <8% of the species I detected, indicates a high degree of ecological integrity. Given its interior location within the City of Santa Rosa, I would have expected a higher percentage of non-native species. The Park is relatively intact, ecologically, and it is rich in wildlife"…

The park project design the City of Santa Rosa Council approved is too impactful and unbalanced. Community groups, residents, students and teachers have appealed to the City for many years to create an ecological reserve with passive recreation, cultural elements, and educational opportunities. This direction is what is optimal for the Roseland Creek property. We strongly encourage you to consider changing course to a more positive, balanced, climate-supportive and innovative park design and project. Of course, we remain interested in supporting and participating. Understanding and achieving the balance of human activity with sensitivity to habitat areas can lead to best decisions and outcomes. Madrone Audubon has a 12-year history of nesting support for the West 9th Street heron and egret rookery in SW Santa Rosa. We are expanding our relationship with Lincoln Elementary School, thanks to a grant from National Audubon, for habitat gardening to support survival of birds, butterflies, bees and other species in need. We would, as we have shared in the past, want to support the City of Santa Rosa's change of course and decisions for the ecological reserve in Roseland.

Sincerely yours,

Susan Kirks

Susan Kirks, President
Madrone Audubon, Sonoma County susankirks@sbcglobal.net, 707-241-5548

cc: Sonoma County Water Agency
Sonoma Co. Ag and Open Space District

-----Original Message-----
From: Mary Goe [redacted]
Sent: Saturday, May 11, 2024 3:38 PM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] Roseland Creek Park

I would like to see the nature park kept as natural as possible. The fewer parking spaces the better. I would like to see the creek restored and the concrete removed. Some of the concrete wall along the creek has collapsed and I fear it could be dangerous to children playing in the creek bed.
Thank you
Mary Goe
[redacted]
Sent from my iPhone

June 17, 2024

Jen Santos, Deputy Director – Parks
jsantos@srcity.org
RE: Roseland Community Park Draft Environmental Impact Report (DEIR)

Dear Ms. Santos,

Please acknowledge receipt of this letter.

I am a 25-year resident of Santa Rosa and have walked the proposed Roseland Community Park many times with various agencies and residents who are passionate about saving one of the last remaining valley oak woodlands in Sonoma County. I concur with the comments of three letters you have received regarding the DEIR: from the California Oaks Program of the California Wildlife Foundation, from Milo Baker Chapter CNPS and from Lynn Houser. I would like to add, from an aesthetic and environmental perspective, developing a "standard city park" requiring significant infrastructure that removes established native trees and vegetation, destroys a valuable ecosystem and its biodiversity, adds heat islands of concrete and asphalt, contradicts Santa Rosa's greenhouse gas reduction goals, and climate resilience goals, which include the human need for natural spaces so important in a quickly changing climate. And finally, the irony of the expense of destroying an ecosystem important to all life, humans, and animals, and then spend maintenance hours maintaining an unnatural system is based on old ideas. Let us go forward differently, and make this a training ground for environmental inquiry, by the local community, schools, and non-profits. We are way beyond business as usual, we cannot afford business as usual.

Thank you for considering my comments.

Regards,
Natasha Granoff

Richard Ingram
[redacted]

June 17, 2024

Jen Santos
Parks Deputy Director
City of Santa Rosa
637 First Street
Santa Rosa, CA 95404

Roseland Creek Community Park
Draft Environmental Impact Report

Dear Ms. Santos,

Thank you for the opportunity to submit comments regarding the DEIR.

My comments pertain, in part, to sections within the DEIR regarding Land Use and Planning, Hydrology and Water Quality and Wildfires. Analyses within these three sections of the DEIR appear incomplete:

- Impacts regarding Land Use and Planning have not considered the transition of the future park from it's past use under private ownership to public use.
- Impacts regarding Hydrology and Water Quality have not considered the potential for ongoing occupation by unhoused people.
- Impacts regarding Wildfires have not considered the fuel load inventory as it relates to both park maintenance capability the the potential for ongoing occupation by unhoused people

The DEIR is, as well, silent concerning a discussion regarding Public Safety. Our environment, how we live, how we utilize

public spaces, how public spaces are administered and maintained, all influence Public Safety. In our modern era, design elements of public spaces, including parks, are typically shaped with major considerations toward Public Safety. How the park will be maintained, administered, policed are all factors that may significantly impact the environment as it relates to water quality, wildfires and the health and welfare of those residents using the park and those who live adjacent to the park. Will there be sufficient resources dedicated by police, fire and parks departments to maintain this new park in a manner that avoids environmental impacts? That question needs to be considered in the DEIR in a way that assures those public officials who are considering the project for approval that the development of the proposed park will put an end to the significant risks to the environment that, for the past several years, have occurred on the parcels of land where the park is planned.

The DEIR should assess whether the City has capacity with current infrastructure and staffing levels of the police, fire and parks department to actually do what is necessary to provide a level of service that will assure people using that park or people living adjacent to the park that it will be a safe place. The four parcels that make up the land for future park are now open space, owned, maintained and policed by the City. The 19-acre site has, for the past several years, been a revolving door for unhoused transients. The site has been set on fire numerous times over the years. Huge accumulations of trash left by unhoused people have occurred. There have been fights, arrests, trespassing and theft from adjacent homes boardering the future park. Unhoused people have used the future park site and Roseland Creek as a toilet and a trash receptacle.

Section 3.11, Land Use and Planning, speaks to the conformity of the proposed park with the current land use. This land has been open space for some time and the creation of a park is certainly a natural progression given the City's growth and annexation of Roseland. Prior to being open space, it was rural farmland. Existing homes, for instance, along Hughes Avenue which border the entire northern boundary of the proposed park, were constructed in the early 1950's and bordered what was then farmland. Being adjacent to a proposed public park is significantly different than being adjacent to private farmland. The real change in land use that needs to be addressed in the DEIR is from private land that was held by individuals where access was controlled and maintenance of that land was responsibly undertaken, to now - ownership by public entities. The development of the park is just the final step in the conversion of what was once private land to public land. The issues associated with private residences bordering public land include public safety issues. Those owning homes in the neighborhood along Hughes Avenue that back up to the proposed park have long had to suffer the consequences of the lack of maintenance and security of what was once private land and is now public land.

Questions of how the City will prevent unhoused people from camping in the park, building fires in the tall grass should be addressed in the EIR. The park plan that's associated with this environmental document creates very little change to the landscape. As an example, the first several hundred feet south of the northern park border will remain essentially unchanged. The DEIR indicates that there are no impacts associated with land use changes. In fact, there have been impacts associated with the creation of this public land. The open space district and now the City have historically not provided an adequate level of maintenance throughout the

period of this long and drawn out process of creating a park. Weeds are not mowed until they are 6 feet tall. Unhoused people camp and build fires during high fire danger periods subjecting the entire neighborhood to unnecessary risks.

Prior to public or quasi-public acquisition of this property, the land was farmed in a responsible manner. Trespassing was not allowed. Now that the City has the property, unhoused people have more rights to use the land than they once did when the land was under private ownership. This change in ownership created a change in land use, a change in the level of public safety and definite impacts to the environment. These impacts are not being addressed in the DEIR.

Section 3.10 discusses Hydrology and Water Quality. Currently there are environmental impacts occurring every day within the proposed park boundary from unhoused people that are not utilizing sanitation facilities. With the creation of the park, how will the City ensure that these impacts do not continue. The plan for the park calls for the installation of a split rail fence along Burbank Avenue and closing a gate at night. Will that be adequate to prevent unhoused people from continuing to do what they do now? These potential impacts are not discussed in the DEIR.

Section 3.20 discusses Wildfires. The DEIR indicates there are no significant impacts associated with wildfires. Unhoused people building fires in tall grass has the potential to create huge environmental impacts. The potential exists for the destruction of an entire neighborhood. Air quality, water quality, impacts to health and welfare are all potential impacts. There have been numerous unhoused people who

are allowed to camp on City owned property for extended periods of time without facilities, without water, without sanitation, without rules to be followed. The creation of the park does not solve these problems if the land that is being utilized does not change and the enforcement of the rules remains the same.

Parks and open space are terrific ideas and healthy for a neighborhood. Housing the unhoused is a complex and daunting problem facing Cities. The issues around the interface between public and private land are difficult problems to address. However, the City should take ownership of these problems and provide resolutions to an ongoing and old issue that has plagued this neighborhood. And it needs to begin by including evaluation of these real issues within the context of this environmental document.

It is unfortunate that this land has not been developed into a park in a timely fashion. Now that the City is involved I am hopeful that a wonderful park will be created. The City has inherited numerous pre-existing problems with the annexation of Roseland. One of the largest problems may be one that is not well recognized. Surface water drainage in the Roseland area is a very big challenge. Sebastopol Road, north of the proposed park, collects an inordinate amount of debris/garbage that makes its way into surrounding waterways. This is an environmental problem that is likely beyond the scope of this DEIR, however Roseland Creek runs right through the middle of the proposed park and the creek is subject to ongoing degradation from surface water discharges from streets in the area. An opportunity exists with the

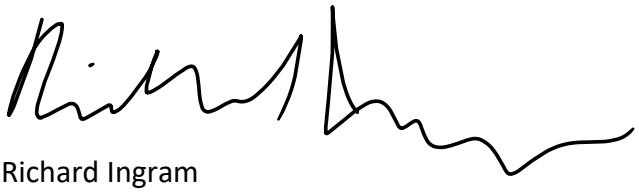
creation of this park to improve and address some of these surface water discharges while also reducing wildfire risks and addressing security concerns.

Along the northern boundary of the proposed park, some of the past proposed park alternatives involved the creation of vernal pool wetlands. Some opinions expressed by consultants indicated that the vernal pool wetlands would not be as successful as one would hope. However, the creation of vernal pool wetlands is only one type of maintained wetland that can benefit the environmental health of the area. If the focus of the constructed wetlands were to change from creating vernal pool habitat to controlling pollution that's coming from street runoff, then wetlands could be successful. Much of the area north of the park eventually drains to Roseland Creek. If surface water collected during storms could be diverted before entering the Creek and routed through surface water treatment wetlands, harmful pollutants could be treated through passive natural processes by being slowly routed through these wetlands. The potential for area flooding could also be diminished by utilization of these wetlands as well by slowing the speed of the runoff thereby reducing the peak flows in the creek. These newly constructed treatment wetlands could act as a buffer between people that were utilizing the park and the residents that border the northern boundary of the proposed park. In this way, security for those residents could be improved, storm water pollution could be mitigated, and wildfire threats could be lowered by careful maintenance of these new wetlands.

The development of a park of this size is a significant undertaking for the City and it's also a significant opportunity to make Roseland better as a whole. Not enough has been done on this property for too long.

I implore that the City use thoughtful leadership to see that this park gets built and is done right, as well as being open to the opportunity that the creation of this park provides to address other issues in Roseland.

Sincerely,



Richard Ingram

From: Seth Tippey [redacted]
Sent: Sunday, June 2, 2024 12:32 PM
To: Santos, Jen <JSantos@srcity.org>
Subject: [EXTERNAL] Roseland Creek Community Park

Hi Jen,

I want to start by saying that I know this project has been worked on for years and years, and there has been a lot of community involvement, both in trying to push this park forward and in resisting any change to the area. And as much as I want the natural beauty of this park to remain completely unchanged, I recognize that my wish is quite selfish, and that improving access will allow more people to enjoy this beautiful park. So I can see the need to add parking and make it easier for people of all ages to be able to walk the paths.

The part that I feel most compelled to comment on is the addition of the lawn area and sports court. My wife and I have been living in Roseland for years, and we've watched as all the open fields have disappeared. Development is everywhere -- including just beyond Roseland Creek Park where dozens of houses are being built as we speak -- and Roseland's natural beauty is being replaced. This is one of the few natural parks in Roseland that remains intact. Given how many other parks already exist in the area with sports fields/courts, why does this one need to turn into the same thing? Again, I do recognize that keeping the park exactly the same is unrealistic. What exists here is worth sharing, and I would be happy if more people got to enjoy it. Just don't destroy the parts of the park that are unique and replace them with generic sports fields/courts that you can find at every other park.

My wife and I watched two baby great horned owls grow up last year. I've never seen that in my entire life. I regularly encounter flocks of baby turkeys. Red shouldered hawks nest in the trees. This park is amazing. The fact that it's still here is amazing. The reason we bought our house here is because our property backs up to its open fields and trees. We have the gift of getting to walk our dog in this park every day, and I want more people to experience what they might not even know exists in their own neighborhood.

Please consider keeping the park as natural and undisturbed as possible. I know it won't be the same as it is today, but I think people would greatly benefit from having access to a park that's this beautiful and unique. Leave it undisturbed and see how the community reacts to having easier access to its paths along the creek before deciding to add features that make it like every other park in Roseland.

Thank you for your time and effort on this project.

--Seth