Memorandum

Date: April 12, 2023

To: Robert Ule, Viavi Solutions

From: Mary Bean, Project Director

Subject: Section 15168 Environmental Analysis Memorandum for the Mariner Way Parking Lot Expansion Project

I. Introduction

Viavi Solutions has contracted with FirstCarbon Solutions (FCS) to evaluate whether the proposed Mariner Way Parking Lot Expansion Project (proposed project) meets the criteria identified in California Environmental Quality Act (CEQA) Guidelines Section 15168. As evaluated herein, the proposed project would be within the scope of the previously certified Santa Rosa General Plan 2035 Environmental Impact Report (General Plan EIR) and is consistent with the criteria listed in CEQA Section 15168.

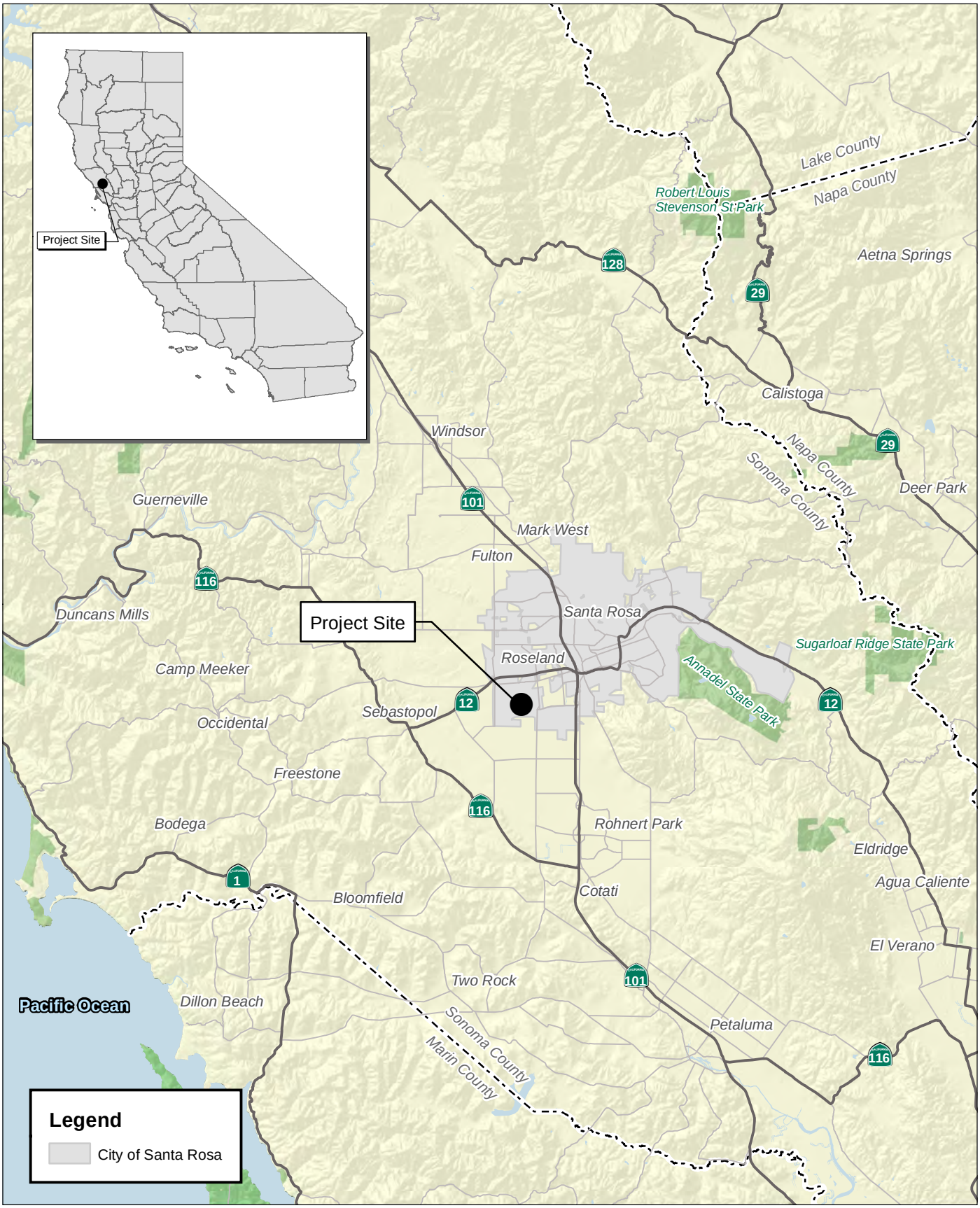
Please contact Mary Bean at 415.713.5223 or mbean@fcs-intl.com if you have questions regarding this Memorandum.

II. Project Description

The project site is located off Mariner Way in the City of Santa Rosa, in Sonoma County, California (Exhibit 1). The project site consists of one parcel (Assessor's Parcel Number [APN] 035-530-050). The site is bound by vacant land to the north and west; the Roseland Creek, residential development, and vacant land to the south; and the existing Viavi Solutions commerce center to the east (Exhibit 2). The site is located next to the decommissioned Santa Rosa Air Center, with compacted gravel strips and open grassy fields on either side.

The proposed project includes a parking lot expansion with 27 proposed parking lot stalls for a project area of 11,724 square feet (8,235 square feet of which would be impervious surfaces and 3,489 of pervious surfaces) to serve the existing Viavi Solutions to the east of the site (Exhibit 3). The proposed project would include landscaping (see Exhibit 4) and lighting associated with the parking lot expansion. The proposed project would not result in the expansion of current operations and would instead support existing operations. The proposed project would require design review.

The Santa Rosa General Plan 2035 (General Plan) designates the site as General Industry (IG), which provides areas for manufacturing and distribution activities, along with accessory offices and retailing. Unrelated retail and service commercial uses that could be more appropriately located elsewhere in the City are not permitted. Uses may generate truck traffic and operate 24 hours a day.



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

FIRSTCARBON SOLUTIONS™

4.5 2.25 0 4.5 Miles

Exhibit 1
Regional Location Map

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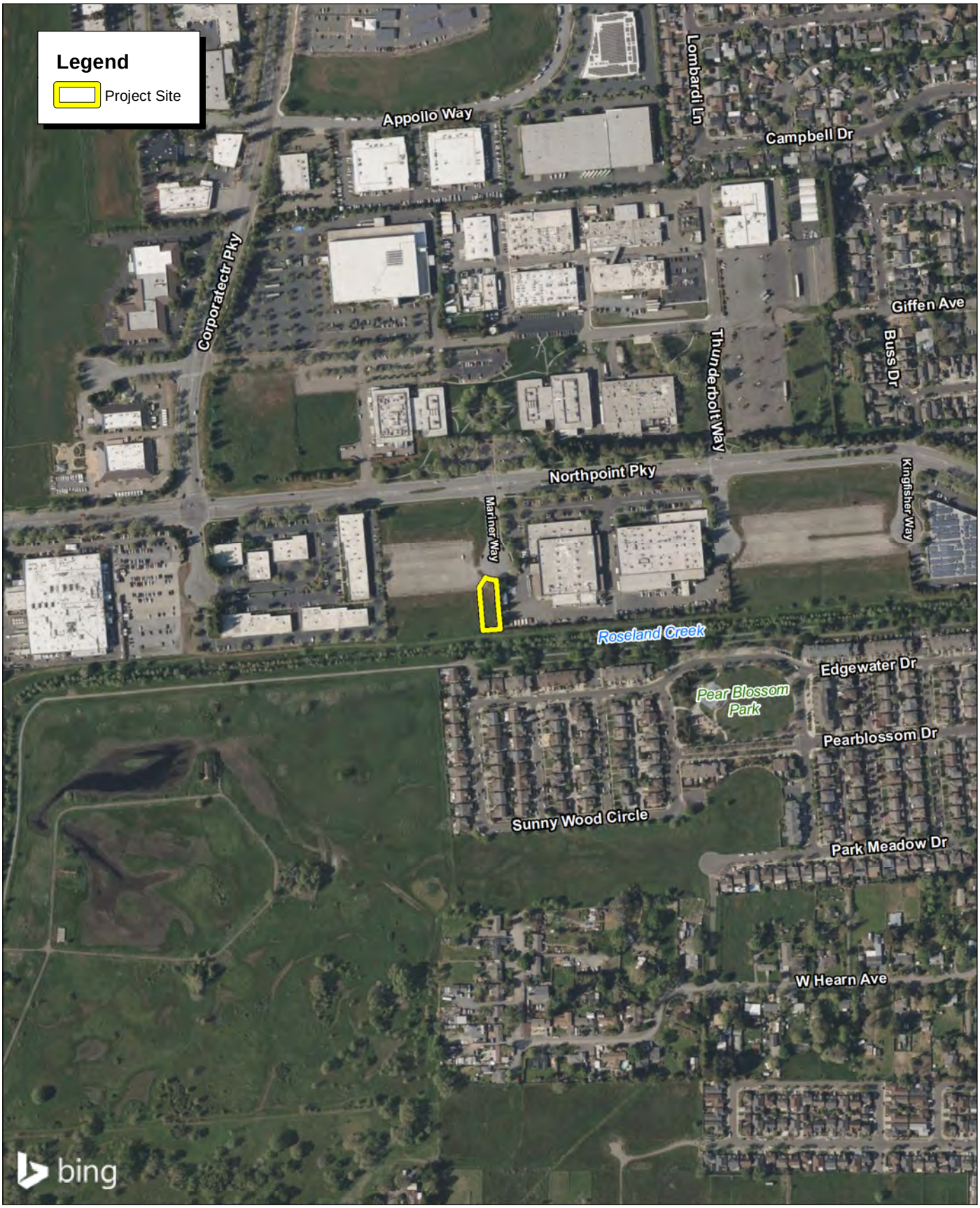
VIAVI SOLUTIONS
MARINER WAY PARKING LOT EXPANSION PROJECT
ENVIRONMENTAL ANALYSIS



Source: Bing Aerial Imagery.

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510 255 0 510
Feet

Exhibit 2
Local Vicinity Map

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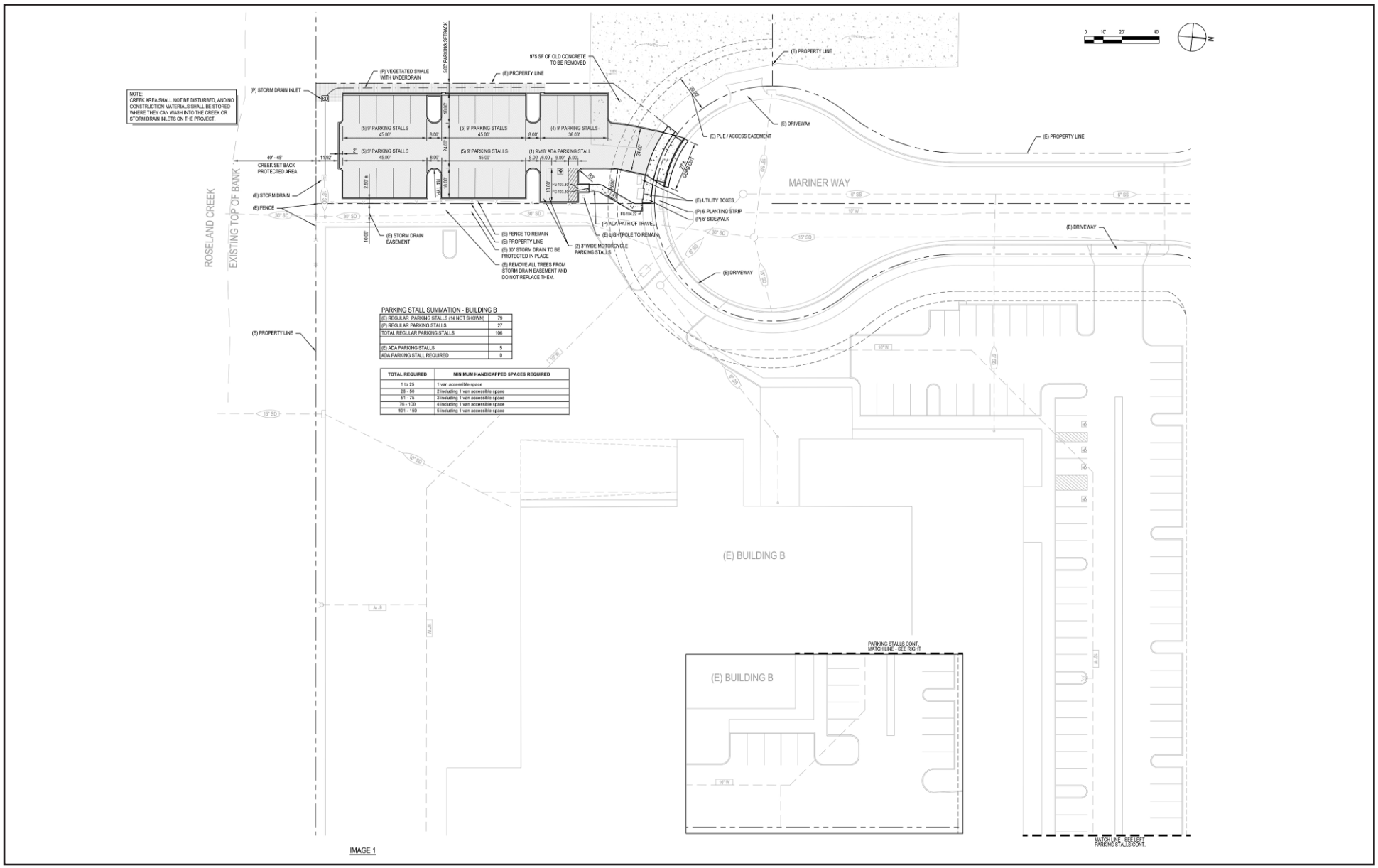
VIAVI SOLUTIONS
MARINER WAY PARKING LOT EXPANSION PROJECT
ENVIRONMENTAL ANALYSIS



Source: GHD Inc. 07/15/2020.

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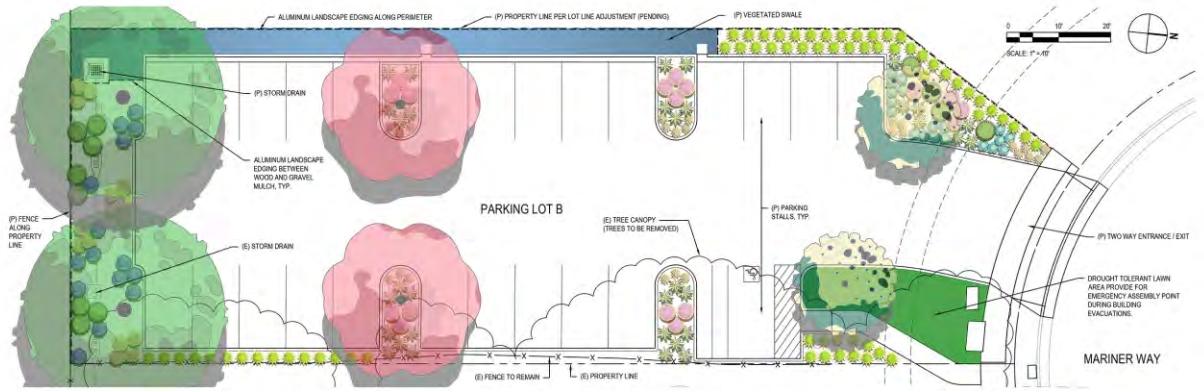
Exhibit 3
Proposed Site Plan

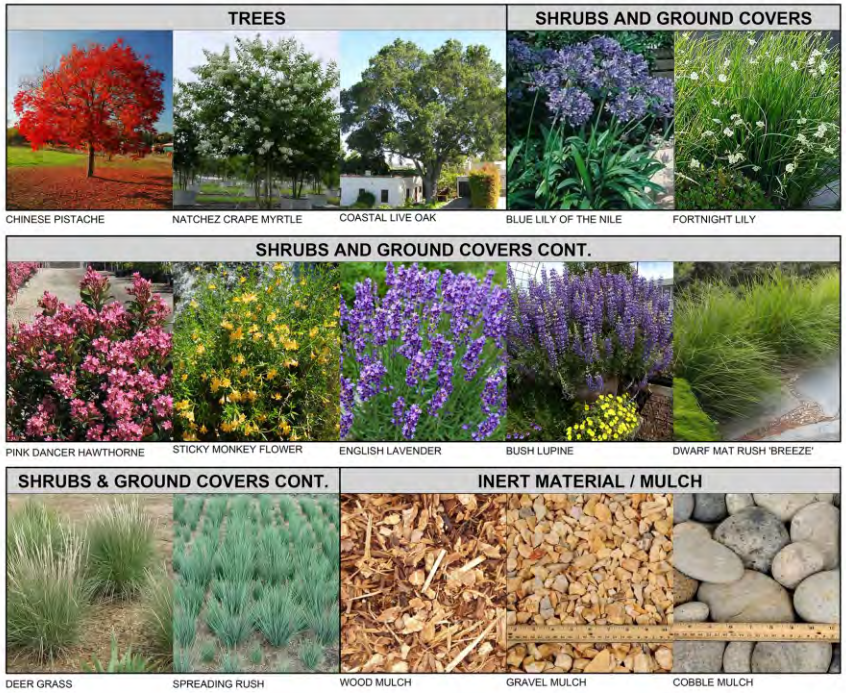


PLANT SCHEDULE MARINER WAY - LOT B

TREES	CODE	QTY	BOTANICAL NAME	COMMON NAME	CONT
	LAG N40	2	Lagerstroemia indica x fauriei `Natchez` Low Water Use (WUCOLS)	Natchez Crape Myrtle	24" Box
	PK	2	Pistacia chinensis `Keith Davey` Low Water Use (WUCOLS)	Keith Davey Chinese Pistache	24" Box
	QUE AGR	2	Quercus agrifolia Low Water Use (WUCOLS)	Coast Live Oak	24" Box
SHRUBS	**CODE**	**QTY**	**BOTANICAL NAME**	**COMMON NAME**	**CONT**
	AO	24	Agapanthus orientalis `BLUE` Medium Water Use (WUCOLS)	Blue` Lily of the Nile	5 gal
	DB2	33	Dietes bicolor Low Water Use (WUCOLS)	Fortnight Lily	5 gal
	LAV ANG	19	Lavandula angustifolia `Essance Purple` Low Water Use (WUCOLS)	English Lavender	5 gal
	LB	65	Lomandra longifolia `Breeze` Low Water Use (WUCOLS)	Dwarf Mat Rush Breeze	1 gal
	LUP ALB	15	Lupinus albifrons Low Water Use (WUCOLS)	Bush Lupine	5 gal
	MIM AUR	15	Mimulus aurantiacus Low Water Use (WUCOLS)	Sticky Monkey Flower	5 gal
	MR	12	Muhlenbergia rigens Low Water Use (WUCOLS)	Deer Grass	5 gal
	RB	17	Rhaphiolepis indica `Pink Dancer` Low Water Use (WUCOLS)	Pink Dancer Hawthorne	5 gal
GROUND COVERS	**CODE**	**QTY**	**BOTANICAL NAME**	**COMMON NAME**	**CONT**
	SOD BOL	370 sf	`Bolero Plus` Turf Sod Medium Water Use	By Delta BlueGrass	Sod
	JE2	173	Juncus patens `Elk Blue` Low Water Use (WUCOLS)	Spreading Rush	1 GAL

MULCH SCHEDULE MARINER WAY - LOT B

SYMBOL	DESCRIPTION	QTY
NOT SHOWN	Gravel Mulch	4.1 cy
NOT SHOWN	Wood Mulch	18.79 cy
NOT SHOWN	Cobble Mulch	0.46 cy



Source: GHD Inc. 07/28/2020.

The site is zoned as General Industrial (IG). The IG zoning district is applied to areas appropriate for industrial and manufacturing activities, warehousing, wholesaling, and distribution uses. Uses may generate truck traffic and operate 24 hours. Retail and business service uses that could be more appropriate in another zone are not permitted. Land uses allowed in the IG zoning district have the potential for creating objectionable noise, smoke, odor, dust, noxious gases, glare, heat, vibration, or industrial wastes. The IG zoning district is consistent with the IG land use classification of the General Plan.

III. Environmental Commitments

The proposed project would implement the following environmental commitments, which would be included as conditions of approval for the proposed project. These conditions shall be incorporated into all appropriate construction documents, subject to the review and approval of the Planning Division prior to building permit issuance:

Construction Bay Area Air Quality Management District Best Management Practices

During construction, the following Best Management Practices (BMPs), as recommended by the Bay Area Air Quality Management District (BAAQMD), shall be implemented and stated on the face of the construction plans:

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, or more as needed.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads and surfaces shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks shall be paved as soon as possible.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure [ATCM] Title 13 § 2485 of the California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

- A publicly visible sign shall be posted with the telephone number and person to contact both at Sonoma County and at the office of the General Contractor regarding dust complaints. This person shall respond and take corrective action within two business days of a complaint or issue notification. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

Biological Resources Best Management Practices

In accordance with the Sonoma County Best Management Practice Guidelines, the project applicant shall develop and implement BMPs that outline how impacts to off-site habitat would be avoided (e.g., silt fences, straw waddles, etc.). The identified BMPs shall be incorporated into all appropriate construction documents, subject to review, and approval by the Planning Division prior to issuance of entitlements for the proposed project.

Nesting Birds

As described in the Biological Resources Report prepared by Sol Ecology in June 2022 (Attachment A), if construction begins between February 1 and August 31, a pre-construction nesting bird (both passerine and raptor) survey of suitable nesting habitats within 200 feet of all work areas shall be performed within 7 days of groundbreaking. If no nesting birds are observed, no further action is required. A follow up survey is required if a stoppage of work occurs for longer than 7 days between February 1 and July 1.

If active bird nests (passerine and/or raptor) are observed during the pre-construction survey, a disturbance-free buffer zone shall be established around the nest tree(s) until the young have fledged or the nest has naturally failed or been predated, as determined by a qualified Biologist. The radius of the required buffer zone can vary depending on the species, with the dimension of any required buffer zone to be determined by a qualified Biologist.

California Tiger Salamander

The project applicant shall develop and implement an approved erosion and sediment control plan to prevent impacts of construction on habitat outside the work areas. The project applicant shall consult with either United States Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW) for impacts to the California tiger salamander (*Ambystoma californiense* [CTS]); an incidental take permit (ITP) may be required. Moreover, given the location of the project site (greater than 500 feet but within 2,200 feet of a known breeding site), in accordance with the Programmatic Biological Opinion, impacts to upland CTS habitat shall be mitigated at a 2:1 ratio. CTS upland habitat mitigation would need to be mitigated for at either an approved CDFW mitigation bank or through CDFW approved mitigation lands elsewhere within the Santa Rosa Plain.

IV. CEQA FRAMEWORK FOR SECTION 15168 CONSISTENCY ANALYSIS

Criteria for a Section 15168 Consistency Analysis

Section 15168 applies when a Program EIR already adequately describes the activity associated with a proposed project. Pursuant to Section 15168(c):

> Subsequent activities in the Program EIR must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared.
>
> (1) If a later activity would have effects that were not examined in the Program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.
>
> (2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document would be required.
>
> (3) An agency shall incorporate feasible mitigation measures and alternatives developed in the Program EIR into later activities in the program.
>
> (4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the Program EIR.
>
> (5) A Program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the Program EIR, and no further environmental documents would be required.

V. ANALYSIS OF POTENTIAL ENVIRONMENTAL EFFECTS

Consistency with Allowable Land Use

As described above, one factor in determining whether a later activity is within the scope of a Program EIR is consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the Program EIR.

The General Plan provides a framework for future decisions and actions that affect development in the City. The General Plan EIR (State Clearinghouse No. 2008092114), certified in 2009, is a Program EIR that evaluates the environmental impacts of development as envisioned in the General Plan. Therefore, if a proposed project is consistent with the planned uses and density as envisioned by the General Plan, then

the environmental impacts associated with the later activity can be assumed to have been covered in the Program EIR (i.e., the General Plan EIR).

As described above, the site is designated IG by the General Plan, which provides areas for manufacturing and distribution activities, along with accessory offices and retailing. The site is zoned as IG, and a manufacturing facility is a permitted use within this district. The proposed project would expand the existing parking lot associated with Viavi Solutions, which is an existing manufacturing company. The area surrounding the project site is also made up of industrial uses, and the proposed use, supporting an existing manufacturing use, would be in line with the surrounding community. Therefore, the proposed project is consistent with the applicable General Plan designation and applicable zoning designation, and thus, environmental impacts associated with the parking lot expansion have already been evaluated within the General Plan EIR.

Incorporation of Program EIR Mitigation Measures

Pursuant to Section 15168(c)(3), an agency shall incorporate feasible mitigation measures and alternatives developed in the Program EIR into later activities in the program. The mitigation measures included in the General Plan EIR are provided below followed by a discussion of whether they would be required to be implemented as part of the proposed project.

Mitigation Measure 4.D-4

MM 4.D-4 The City of Santa Rosa shall require new sensitive uses proposed to be located within 500 feet of high-volume traffic routes where daily vehicle counts exceed 100,000, require the use of an HVAC system with filtration to reduce/mitigate infiltration of vehicle emissions as warranted by exposure analysis.

The proposed project includes the expansion of an existing parking lot serving an existing manufacturing site. Therefore, it would not include the development of a new sensitive use, and MM 4.D-4 would not apply to the proposed project.

Mitigation Measure 4.D-5

MM 4.D-5 The City of Santa Rosa has developed a Greenhouse Gas Emission Reduction Action Plan that identifies greenhouse gas emissions within the City as well as ways to reduce those emissions. The City should continue to implement this plan for City operations as well as implement some of the Community Climate Action Plan 2008 that was developed by the Climate Protection Campaign. Many of the suggestions, mechanisms and policies contained in both of these documents, as well as the General Plan, are either ongoing, or if implemented, can have a positive impact on reducing GHG emissions community-wide. Implementation shall parallel the requirements adopted by the Air Resource Board specific to this issue and will incorporate analyses, goals, and strategies included in the General Plan, City Council Resolution #26341 (GHG reduction targets) and the City of

Santa Rosa Greenhouse Gas Emissions Reduction Action Plan Analysis. Specifically, the City shall ensure that the following key items are done:

- Update and maintain the inventory of all known, or reasonably discoverable, sources of greenhouse gases in the City via the GHG Emission Reduction Action Plan,
- Compare the inventory of the greenhouse gas emissions level in 1990, the current level, and revise as necessary the level projected for the year 2035 based upon ongoing progress, and
- Incorporate new City and community activities/goals/policies which move toward achievement of the targets to reduce municipal greenhouse gas emission by 20 percent from 2000 levels by 2010 and help facilitate the community-wide greenhouse gas emission reduction target of 25 percent from 1990 levels by 2015.

This mitigation measure is at the programmatic level and would only be possible for the City to initiate and complete. The proposed project would support this mitigation measure by complying with applicable State and local laws during construction. Furthermore, during construction activities, the proposed project would implement BMPs recommended by the BAAQMD to reduce construction-related greenhouse gas (GHG) emissions including maximizing the use of alternative fueled construction vehicles and equipment and local building materials as well as recycling or reusing construction and demolition waste to the maximum extent practicable.

Mitigation Measure 4.F-5

MM 4.F-5 The City of Santa Rosa shall incorporate the avoidance and mitigation measures described in the Santa Rosa Plain Conservation Strategy and the USFWS Programmatic Biological Opinion, as conditions of approval for development in or near areas with suitable habitat for California tiger salamander, Burke's goldfields, Sonoma sunshine, Sebastopol meadowfoam, and many-flowered navarretia. However, in accordance with the USFWS Programmatic Biological Opinion, projects within the Southwest Santa Rosa Preserve System will be evaluated individually and mitigation may not necessarily adhere to the ratios described in the Conservation Strategy.

Endangered, Rare, or Threatened Species

Special-status Plant Species

As described in the Biological Resources Report prepared by Sol Ecology in June 2022 (Attachment A), the project site is designated critical habitat for four federal listed plants including Sonoma sunshine (*Blennosperma bakeri*), Burke's goldfields (*Lasthetnia burkei*), many-flowered navarretia (*Navarretia leucocephala ssp. Plieantha*), and Sebastopol meadowfoam (*Limnanthes viculans*). The Biological Resources Report determined that no suitable wetland habitat is present and also determined that there is evidence of historic site disturbance, both of which preclude these species from occurring on-site. In addition, floristic plant surveys conducted in March, April, and May 2022 yielded negative findings for any special-status plant species. The Biological Resources Report also determined that species

documented in the area are unlikely or have no potential to occur on the project site because: (1) appropriate hydrologic conditions do not exist on-site, (2) associated vegetation communities do not exist on-site, (3) topographic conditions (e.g., slopes) necessary to support the special-status plants to do not exist on-site, and (4), unique pH conditions (e.g., serpentine soils) necessary to support the special-status plant species are not present with the project site.

Special-status Wildlife

Seven special-status wildlife species have been documented within a 5 mile radius of the project site (Attachment A). Five of the species were determined to be unlikely to occur on the project site because of an absence of suitable habitat elements in and immediately adjacent to the project site as described in more detail in the Biological Resources Report. The project site was found to support two special-status species: California tiger salamander and white-tailed kite (*Elanus Leucurus*) with a low potential for occurrence for both species. These two species are described in more detail below.

California Tiger Salamander

The project site is within the USFWS designated Critical Habitat for CTS, and is within an area designated as "may affected listed plants and would likely affect CTS." There are 61 California Natural Diversity Database (CNDDB) records for CTS within a 5-mile radius of the project site, and the highest concentrations are immediately south with much fewer occurrences to the west. The nearest documented occurrence was last observed in 2016 within the Federal Emergency Management Agency (FEMA) preserve approximately 1,000 feet west of the project site. CTS could access the project site via Roseland Creek. The absence of CTS records to the north and high degree of development to the north of the project site makes it unlikely for CTS to access the project site from the north. Because of the small size of the site and the lack of direct connectivity to breeding habitat, the Biological Resources Report determined that the project site has a minimal likelihood to affect CTS. However, because the species can disperse into upland habitats more than 1 mile from a breeding pool, the potential presence cannot be eliminated and, if present, CTS would be subject to direct mortality during construction.

Given existing barriers located to the north of the project site and the lack of breeding habitat, the Biological Resources Report determined the proposed project would not result in any permanent barrier between the project site and documented breeding habitats. In accordance with the Santa Rosa Plain Conservation Strategy and the USFWS Programmatic Biological Opinion (and implemented by MM 4.F-5), impacts to CTS shall be mitigated at a 2:1 ratio. The proposed project would result in the removal of 0.27 acre of suitable upland habitat; of which 0.05 acre is underlain by existing compacted gravel or pavement and would not be factored into the mitigation requirement. Therefore, a total of 0.22 acre of CTS upland habitat shall be mitigated for at either an approved CDFW conservation bank or through the acquisition of CDFW approved permitted-responsible mitigation lands elsewhere on the Santa Rosa Plain. In addition, the proposed project would develop and implement an approved erosion and sediment control plan to prevent impacts of construction on habitat outside the work area. The project applicant shall consult with either the USFWS or CDFW for impacts to CTS; an ITP may be required. Potential impacts to this special-status species would be less than significant with adherence to the environment commitment required above.

White-Tailed Kite

Given the lack of tall trees adjacent to the project site that provide suitable nesting habitat for white-tailed kite, the Biological Resources Report determined there is a low potential for this species to nest in the area, and the proposed project would result in negligible impacts to foraging habitat. The nearest CNDDB records for white-tailed kite is a nesting location 1.2 miles east of the project site. Potential impacts to this special-status species would be less than significant with adherence to the environment commitment required above.

Migratory Birds

The project site is devoid of shrubs and trees; however, the surrounding area provides nesting habitat for birds protected by the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Section 3513. Additionally, the environmental commitments described above are required to ensure consistency with the General Plan EIR and avoid significant impacts by establishing processes that comply with the MBTA and State regulations. Compliance with these regulations would address conservation and potential biological impacts at a regional level. Accordingly, with implementation of the standard conditions, impacts would be less than significant.

In addition, the proposed project would adhere to applicable State and local laws, including the Sonoma County Best Management Practice Guidelines, which would ensure impacts to off-site habitats and resources are avoided during construction.

Substantial Changes or New Information of Substantial Importance

As part of this review, all topical areas analyzed in the General Plan EIR were considered for analysis. The proposed project would be consistent with the assumptions for the project site as presented in the General Plan and the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR, as confirmed in the analysis provided below. In addition, there are no impacts associated with the proposed project that are peculiar to the site and no substantial changes in environmental circumstances that would result in new or more severe significant environmental effects than were identified and evaluated in the General Plan EIR. Therefore, no further environmental analysis is required.

Aesthetics

The proposed project would be an extension of an existing parking lot and would therefore not disrupt the existing visual character of the surrounding area. Because the proposed parking lot expansion would not add substantial height to the project site, it would not disrupt views of scenic resources or views along scenic highways or along the City's Scenic Roads. Lighting at the project site would be designed in compliance with local policies and ordinances, confirmed during design review. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Agriculture and Forestry

According to the California Department of Conservation California Important Farmland Finder, the project site does not contain farmland.[1] In addition, the site does not include land zoned for agricultural use, or land that is under a Williamson Act Contract. In addition, it does not include forest land. The project site is vacant and disturbed. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Air Quality

The proposed project is consistent with the land use designation included in the General Plan, which was considered as a part of the BAAQMD Clean Air Plan, and the proposed project would be compliant with all applicable State and local regulations, including applicable General Plan policies. The proposed project would include only minor demolition of less than 1,000 square feet of hardscape on the project site. The demolition of this material would involve no more than one excavator and minimal haul trips to remove debris. This level of construction activity would generate emissions of fugitive dust and other criteria pollutants that are reasonably far less than what would occur for any number of the screening project sizes that BAAQMD acknowledges to result in less than significant impacts to air quality. Furthermore, the proposed project would implement BMPs for construction, which would be stated on the face of the construction plans, as recommended by BAAQMD, ensuring that fugitive dust emissions from project construction would have a less than significant impact per the BAAQMD significance thresholds. The small size of the project, which is well below the BAAQMD Screening Thresholds as included in the BAAQMD 2017 CEQA Guidelines, would ensure that unmitigated construction and operation emissions resulting from the proposed 27 parking spaces would not exceed the BAAQMD's significance thresholds. Lastly, a parking lot is not considered an odor-generating land use. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Biological Resources

The General Plan and Municipal Code Sections 17-24.030 through 17-24.070 establish protections for trees. As a part of approval for on-site development, the project applicant is required to demonstrate and implement consistency with the General Plan and these sections of the Municipal Code, including tree removal permits and protection of maintained trees. These actions would help to ensure that impacts to trees within the project site would be minimized.

As described above, there is no suitable wetland habitat on the project site and historic site disturbance precludes the possibility for special-status plant species to exist on-site. The project site is designated Critical Habitat for CTS, but the proposed project has minimal likelihood to affect CTS, as described above. While the potential presence cannot be ruled out, adherence to the environmental commitments

[1] California Department of Conservation. 2022. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed December 12, 2022.

described above (e.g., mitigation for upland habitat, consultation with USFWS or CDFW) would ensure that impacts are less than significant. The area surrounding the project site provides nesting habitat for migratory birds; the environmental commitments described above are required to ensure consistency with the General Plan EIR and avoid significant impacts by establishing processes that comply with the MBTA and State regulations. Compliance with applicable regulations would address conservation and potential biological impacts at a regional level. Accordingly, with implementation of the standard conditions, impacts would be less than significant. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Cultural Resources

Record searches conducted at the Northwest Information Center (NWIC) revealed that there are no historic resources that lie within the project site. Furthermore, examination of the project site did not reveal artifacts or Native American associated soil modifications and it was concluded that the proposed project would not have an impact upon the known archaeological resources of the area (see Attachment B).[2] Because there is always a chance that ground disturbance could unearth historic resources, prehistoric resources, or human remains, the project applicant would be required to follow all local, State, and federal procedures for inadvertent discovery of cultural resources and human remains. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Energy

The proposed project's small size, compliance with State regulations, and implementation of BAAQMD construction BMPs, would ensure that project construction would not result in high energy usage. Furthermore, the proposed parking lot land use would not generate a significant amount of energy. Lighting associated with the proposed project would comply with Title 24 standards. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Geology and Soils

The General Plan EIR assumes that application of current industry standard geotechnical practices and seismic structural design in accordance with the California Building Standards Code (CBC) as well as adherence to General Plan policies and objectives would ensure that future individual development projects have a less than significant impact with respect to, seismic risks, liquefaction, landslides, settlement, erosion, and other geologic hazards. The proposed project would adhere to such regulations. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

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[2] Archaeological Resources Service. 2022. A Cultural Resources Evaluation of Two Area Totaling Six Properties Along Corporate Center Parkway, Santa Rosa, Sonoma County, California (APNs 035-530-016,-17,-022, -023, -024, -025). July 18.

Greenhouse Gas Emissions

Given the small size of the project, it is anticipated that construction and operation of the proposed project would not generate GHG emissions that would have a significant impact on the environment. As described above, the proposed project would support the City's Greenhouse Gas Emissions Reduction Action Plan (see MM 4.D-5) by complying with applicable State and local laws during construction, including BMPs. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Hazards and Hazardous Materials

The proposed project is an extension of an existing parking lot and would not result in the consistent transport, use, or disposal of hazardous materials outside of project construction, for which all local, State, and federal regulations would apply. As indicated by the California Department of Toxic Substances Control (DTSC) EnviroStor website, the project site is not included on a list of hazardous sites.[3,4,5] As indicated by the California State Water Resources Control Board (State Water Board) GeoTracker website, the project site is not included on a list of open active Leaking Underground Storage Tank (LUST) sites, sites identified with waste constituents above hazardous waste levels, or of "active" Cease and Desist or Cleanup and Abatement Orders.[6] Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Hydrology and Water Quality

The project site is directly located directly north of Roseland Creek, a FEMA 0.2 Percent Annual Chance Flood Hazard area and a regulated 1 Percent Annual Chance Floodway.[7] The proposed project would convert a mostly undeveloped pervious area to a parking lot, primarily containing impervious pavement. The proposed project includes a storm drain inlet at the southwestern corner of the project site (see Exhibit 3) and vegetated swale with underdrain on the western boundary of the project site that would provide storm drainage. In addition, the proposed project would comply with federal, State, and local

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[3] Department of Toxic Substances Control (DTSC). ENVIROSTOR. Hazardous Waste and Substances Site List (Cortese). Website: https://www.envirostor.dtsc.ca.gov/public/search.asp?page=1&cmd=search&business_name=&main_street_name=&city=&zip=&county=&status=ACT%2CBKLG%2CCOM&branch=&site_type=CSITES%2CFUDS&npl=&funding=&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29&reporttype=CORTESE&federal_superfund=&state_response=&voluntary_cleanup=&school_cleanup=&operating=&post_closure=&non_operating=&corrective_action=&tiered_permit=&evaluation=&spec_prog=&national_priority_list=&senate=&congress=&assembly=&critical_pol=&business_type=&case_type=&searchtype=&hwmp_site_type=&cleanup_type=&ocieerp=&hwmp=False&permitted=&pc_permitted=&inspections=&inspectionsother=&complaints=&censustract=&cesdecile=&school_district=&orderby=upper%28business%5Fname%29. Accessed December 9, 2022.

[4] California State Water Resources Control Board (State Water Board). Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit. Website: https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf. Accessed December 21, 2022.

[5] California State Water Resources Control Board (State Water Board). List of "active" Cease and Desist Orders and Cleanup and Abatement Orders. Website: https://calepa.ca.gov/sitecleanup/corteselist/. Accessed December 21, 2022.

[6] California State Water Resources Control Board (State Water Board). 2020. GeoTracker. Website: https://geotracker.waterboards.ca.gov/. Accessed December 9, 2022.

[7] Federal Emergency Management Agency (FEMA). 2022. FEMA Flood Map Service Center :Search By Address. Website: https://msc.fema.gov/portal/search#searchresultsanchor. July, 19. Accessed December 12, 2022.

standards, including those identified in the Standard Urban Storm Water Mitigation Plan (SUSMP) and the Santa Rosa Waterways Plan, which address stormwater and flood water control, preservation of water quality, and minimization of erosion. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Land Use and Planning

As explained above, the proposed project is consistent with the allowable land use at the project site and would comply with all applicable State and local regulations, including applicable General Plan policies. Therefore, it would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating and environmental effect. The proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Mineral Resources

The General Plan does not identify areas in the City at which mineral resources are present or in need of protection. The project site does not currently support any mineral extraction activities. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Noise

During project construction and operation, the proposed project would adhere to applicable General Plan policies as well as to City's Noise Ordinance. Additionally, the project site is zoned for industrial use and operational noise at the project site would be similar to existing noise sources at the existing parking lot. Operation of the parking lot expansion would not result in additional truck traffic at the site. Therefore, the parking lot expansion would not result in noise levels above current levels. As such, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Population and Housing

The proposed project is an extension of an existing parking lot; impacts to population and housing would not occur. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Public Services

The proposed project is an extension of an existing parking lot and would not result in an increased demand for public services. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Recreation

The proposed project is an extension of an existing parking lot and would not result in an increased demand for recreational facilities. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Transportation

Technical Advisory on Evaluating Transportation Impacts in CEQA published by the Governor's Office of Planning and Research (OPR) in December 2018 identifies several criteria that may be used by jurisdictions to identify certain types of projects that are unlikely to have a significant Vehicle Miles Traveled (VMT) impact and can be "screened" from further analysis. [8] The Technical Advisory states that projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less than significant transportation impact. The proposed project would add 27 parking stalls to an existing parking lot but would not result in the expansion of existing operations. Therefore, it is not anticipated that the proposed project would result in additional trips compared to existing conditions. As such, it is assumed the proposed project would not result in more than 110 trips per day and does not require further analysis with respect to VMT.

Similar to existing access to the existing Viavi Solutions parking lot, Mariner Way would provide site access to the proposed parking lot expansion, which would include a 27-foot-wide curb cut with a 24-foot-wide driveway, and the Santa Rosa Planning Department would review project plans to ensure adequate site access as part of project approval, ensuring no increase in hazards due to a design feature. With respect to emergency access, similar to existing emergency access to the existing Viavi Solutions parking lot, Mariner Way would provide access for emergency service personnel responding to calls for service. Proposed site plans would be reviewed by the Santa Rosa Fire Department to ensure adequate access to fire equipment. As such, approval of the proposed project would not result in any significant effects relating to emergency access. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

Utilities and Service Systems

The proposed project would be an extension of an existing parking lot and is not anticipated to increase demand for utility services or require the expansion of utility infrastructure. Development of the proposed project would include five new parking lot lights, which would be powered via existing utility infrastructure. Irrigation for the parking lot would also be provided via existing utility infrastructure. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

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[8] Governor's Office of Planning and Research (OPR). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. Website: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. Accessed December 9, 2022.

Wildfire

The project site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[9] The proposed project would be an extension of an existing parking lot and would removing existing vegetation, decreasing the risks of wildfire. Therefore, the proposed project would not result in any substantial changes, new significant impacts, or increase the severity of any significant impacts previously identified in the General Plan EIR.

VI. Attachments

Attachment A: Biological Resources Supporting Information
Attachment B: Cultural Resources Supporting Information

[9] California Department of Fire and Forestry Protection (CAL FIRE). FHSZ Viewer. Website: https://egis.fire.ca.gov/FHSZ/. Accessed December 11, 2022.

Attachment A:
Biological Resources Supporting Information

BIOLOGICAL RESOURCES REPORT

Mariner Way Parking Lot, Santa Rosa, CA

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June 15, 2022

SOL ECOLOGY

LIST OF ACRONYMS AND ABBREVIATIONS

APN	Assessor's Parcel Number
CDFG/CDFW	California Department of Fish and Game/Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CFGC	California Fish and Game Code
CNPS	California Native Plant Society
CTS	California Tiger Salamander
ESA	Federal Endangered Species Act
ITP	Incidental Take Permit
MBTA	Migratory Bird Treaty Act
PBO	Programmatic Biological Opinion
RWQCB	Regional Water Quality Control Board
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WBWG	Western Bat Working Group

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1.0 INTRODUCTION

On March 24, April 26, and May 27, 2022, Sol Ecology, Inc. performed a biological resources assessment and surveys of the Mariner Way parking lot located at the terminus of Mariner Way in Santa Rosa, California (APN 035-530-050; Project Study Area). The Project Study Area includes the proposed project site and surrounding habitat subject to potential indirect effects of the proposed project as shown in Appendix A – Figure 1.

The purpose of the assessment was to gather information necessary to complete a review of potential biological resource impacts from development of the proposed project, under the guidelines of the California Environmental Quality Act (CEQA) for the City of Santa Rosa. This report describes the results of the site survey and assessment of the Project Study Area for the presence of sensitive biological resources protected by local, state, and federal laws and regulations. This report also contains an evaluation of potential impacts to sensitive biological resources that may occur from the proposed project and potential mitigation measures to compensate for those impacts as warranted. This assessment is based on information available at the time of the study and on-site conditions that were observed on the date of the site visit.

1.1 Project Setting

The Project Study Area is a single 11,761 square foot parcel (0.27 acre), located at the terminus of Mariner Way in southwest Santa Rosa. Directions to the site are as follows:

- From State Route 12 take the Stony Point Road exit and head south to Sebastopol Road;
- turn right (west) on Sebastopol Road and travel about .65 miles;
- turn left (south) onto Corporate Center Parkway and travel about .73 miles;
- turn left (east) onto Northpoint Parkway to 2789 (about .25 miles)

The Project Study Area is located next to the decommissioned Santa Rosa Air Center, with compacted gravel strips and open grassy fields situated on either side. Approximately 11,761 square feet (0.27 acre) will be impacted for the paved parking lot and associated bioretention area and landscaping. The Project Study Area is currently zoned as General Industry (City of Santa Rosa 2022). The parcel is bounded by industrial complexes and vacant lots to the north, east, and west. Roseland Creek parallels the southern boundary of the parcels. Vacant land (known as the Broadmoor South or Yuba Preserve) and a housing development are situated south of Roseland Creek. The surrounding area in general is a mix of residential, commercial business parks, and vacant land associated with the former Santa Rosa Air Center.

2.0 METHODS

On March 24, April 26, and May 27, 2022, the Project Study Area was traversed on foot to determine the presence of (1) plant communities both sensitive and non-sensitive, (2) special status plant and wildlife species, and (3) presence of essential habitat elements for any special-status plant or wildlife species. Species identified during the site visit are provided in Appendix B.

2.1 Literature Review

Prior to the site visit, a desktop analysis was performed to evaluate whether special status species or other sensitive biological resources (e.g., wetlands) could occur in the study area and vicinity. Sol Ecology biologists reviewed the following:

- California Native Plant Society's (CNPS's) A Manual of California Vegetation Online Edition (CNPS 2022)
- U.S. Fish and Wildlife Service (USFWS) National Wetlands Inventory, Wetlands Mapper (USFWS 2022a)
- U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS), Web Soil Survey (USDA 2019)
- Sonoma County Vegetation & LiDAR Data for Sonoma County (Sonoma Veg Project 2014)
- CNPS's Inventory of Rare and Endangered Plants of California search for U.S. Geological Survey (USGS) 7.5-minute Sebastopol quadrangle and nine surrounding quadrangles (Sebastopol, Healdsburg, Mark West Springs, Santa Rosa, Cotati, Two Rock, Valley Ford, Camp Meeker, and Guerneville) (CNPS 2022b)
- California Natural Diversity Database (CNDDB) search for USGS 7.5-minute Sebastopol quadrangle and nine surrounding quadrangles (Sebastopol, Healdsburg, Mark West Springs, Santa Rosa, Cotati, Two Rock, Valley Ford, Camp Meeker, and Guerneville) (CDFW 2022, Appendix D)
- USFWS Information for Planning and Conservation Species Lists (USFWS 2022b; Appendix D)
- California Department of Fish and Game (CDFG) publication "California's Wildlife, Volumes I-III" (Zeiner et al. 1990)
- CDFG publication *California Bird Species of Special Concern* (Shuford and Gardali 2008)
- California Department of Fish and Wildlife (CDFW) and University of California Press publication *California Amphibian and Reptile Species of Special Concern* (Thomson et al. 2016)
- Western Bat Working Group Online Species Accounts (WBWG 2015).

2.2 Field Survey

The Project Study Area was evaluated for the presence of sensitive biological communities, including riparian areas, sensitive plant communities recognized by CDFW, County-mapped

riparian corridors, habitat connectivity corridors, and scenic corridors. Sensitive communities were identified following A Manual of California Vegetation, Online Edition and includes California Wildlife Habitat Relationships habitat classifications.

Sol Ecology biologists also performed reconnaissance-level surveys for special status species on and adjacent to the Project Study Area on March 24, and May 27, 2022. The focus of the surveys was to identify whether suitable habitat elements for each of the special status species documented in the surrounding vicinity are present on the Project Study Area or not and whether the project would have the potential to result in impacts to any of these species and/or their habitats either on- or off-site. Habitat elements examined for the potential presence of sensitive plant species included: soil type, elevation, vegetation community, and dominant plant species. For wildlife species, habitat elements examined included the presence of dispersal habitat, foraging habitat, refugia or estivation habitat, and breeding (or nesting) habitat. All observed wildlife species were recorded (Appendix B – Observed Species Table).

Protocol-level surveys for special status plants with potential to occur were also performed on March 24, April 26, and May 27, 2022, in accordance with state guidelines for floristic plant surveys (CDFW 2018). The entire Project Study Area (including areas outside the proposed footprint) was traversed on foot and all observed plant species were recorded and identified with Jepson eFlora to a taxonomic level sufficient to determine rarity. All observed plant species were recorded (Appendix B – Observed Species Table).

In cases where little information is known about species occurrences and habitat requirements, the species evaluation was based on best professional judgment of Sol Ecology biologists with experience working with the species and habitats. If a special-status species was observed during the site visit, its presence is recorded and discussed. For some threatened and endangered species, a site survey at the level conducted for this report may not be sufficient to determine presence or absence of a species to the specifications of regulatory agencies.

3.0 RESULTS

3.1 Existing Conditions and General Wildlife Use

The Project Study Area is situated in the flat terrain of the Santa Rosa Plain with an average elevation of 33.5 meters (110 feet) above mean sea level. The Project Study Area encompasses one soil map unit identified by the USDA, NRCS (USDA 2019):

- **Clear Lake clay, ponded (CfA):** basin floors, 0 to 2 percent slopes. This soil map unit is poorly drained and occurs in basin floors. Soil parent material is alluvium derived from volcanic and sedimentary rock. CfA is rated as a hydric soil. Minor components include Huichica (6%), Wright (6%), and Zamora (3%).

Vegetation communities present in the Project Study Area were classified based on existing plant community descriptions described in the California Native Plant Society Online Manual of California Vegetation (CNPS 2022a). However, in some cases it is necessary to identify variants of community types or to describe non-vegetated areas that are not described in the literature. Vegetation communities were classified as non-sensitive or sensitive natural communities as defined by CEQA and other applicable laws and regulations.

3.1.1 Vegetation Communities

Natural communities considered sensitive are those identified in local or regional plans, policies, regulations, or by the CDFW. Sensitive vegetation alliances are ranked 1 through 5 based on NatureServe's (2010) methodology, with those alliances ranked globally (G) or statewide (S) as 1 through 3 considered sensitive. Impacts to sensitive natural communities identified in local or regional plans, policies, or regulations or those identified by the CDFW, or USFWS must be considered and evaluated under CEQA (CCR Title 14, Div. 6, Chap. 3, Appendix G). No sensitive vegetation communities were found within the Project Study Area.

<u>Valley and Foothill Grassland Habitat (Non-Native Grassland)</u>
The Project Study Area is dominated by valley and foothill grassland habitat, in which native bunch grass species have been largely or entirely supplanted by introduced, annual Mediterranean grasses (Non-Native Grassland). Stands rich in natives, however, can usually found on unusual substrates, such as serpentinite or somewhat alkaline soils. (CDFW 2021) These non-native grasslands (Holland/CDFW 1986) are dominated by non-native annual grassland characterized by non-native (and invasive) annual grasses and native forbs and wildflowers.

In the Project Study Area, the site was dominated by non-native grasses and herbs including wild oats (*Avena fatua*), little rattlesnake grass (*Briza minor*), Italian rye grass (*Festuca perennis*), bristly ox-tongue (*Helminthotheca echiodes*), smooth cats ear (*Hypochaeris glabra*), hairy cats ear (*Hypochaeris radicata*), common groundsel (*Senecio vulgare*), wild radish (*Raphanus sativus*), chickweed (*Stellaria neglecta*), bird's foot trefoil (*Lotus corniculatus*), Fuller's teasel (*Dipsacus sativus*), spring vetch (*Vicia sativa*), white -stemmed filaree (*Erodium brachycarpum*), wild

geranium (*Geranium dissectum*), ribwort (*Plantago lanceolata*), sheep sorrel (*Rumex acetosella*), and curly dock (*Rumex crispus*). Occasional native species were observed including meadow barley (*Hordeum brachyantherum*), redmaids (*Calandrinia menziesii*), yellow owl's clover (*Triphysaria versicolor* ssp. *faucibarbata*). Wildlife species observed included common raven (*Corvus corax*), American crow (*Corvus brachyrhynchos*), Brewer's blackbird (*Euphagus cyanocephalus*), western bluebird (Sialia Mexicana), northern mockingbird (Mimus polyglottos), song sparrow (Melospiza melodia), red-wing blackbird (Agelaius phoeniceus), and lesser goldfinch (Spinus psaltria). The only mammal observed was Botta's pocket gopher (*Thomomys bottae*) burrows.

3.3 Special-Status Plants

Special-status species include those plants and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the Federal Endangered Species Act (ESA) or California Endangered Species Act (CESA). These acts afford protection to both listed species and those that are formal candidates for listing. CNPS Rare and Endangered Plant Inventory with California Rare Plant Ranks of 1 and 2 are also considered special-status plant species and must be considered under CEQA.

Based upon a review of the resources and databases given in Section 2.1, twenty-seven special-status plant species have been documented within a five-mile radius of the Project Study Area (Appendix A, Figure 2). Based on the presence of biological communities described above and soils at the site, as well as historic site disturbance, the Project Study Area has no potential to support special status plant species. The project is within designated critical habitat for four federal listed plants including Sonoma sunshine (*Blennosperma bakeri*), Burke's goldfields (*Lasthenia burkei*), many-flowered navarretia (*Navarretia leucocephala* ssp. *plieantha*), and Sebastopol meadowfoam (*Limnanthes vinculans*). However, no suitable wetland habitat is present and historic site disturbance likely precludes these species from occurring on the site. Floristic plant surveys conducted in March, April, and May yielded negative findings for any special status plant species.

Species documented in the area are unlikely or have no potential to occur on the Project Study Area for one or more of the following reasons:

- Hydrologic conditions (e.g., marsh habitat, seeps, pond habitat, vernal pools, mesic conditions) necessary to support special-status plants reliant on these habitats (e.g., Burke's goldfields, Sebastopol meadowfoam, Sonoma sunshine, dwarf downingia [*Downingia pusilla*]) do not exist on the site.
- Associated vegetation communities (e.g., cismontane woodland, chaparral, broadleaved upland forest, coastal prairie, or scrub habitats) necessary to support special-status plants reliant on these habitat types (e.g., Rincon Ridge ceanothus [*Ceanothus confuses*], Vine Hill ceantothus [*Ceanothus foliosus* var. *vineatus*], Rincon Ridge manzanita [*Arctostaphylos stanfordiana* ssp. *decumbens*]) do not exist on site.

- Topographic conditions (e.g., slopes) necessary to support the special-status plants do not exist on site.
- Unique pH conditions (e.g., serpentine) necessary to support the special-status plant species are not present on the Project Study Area.

Adverse conditions from yearly weather patterns may prevent accurate identification of some special status plants in the project area. Disease, drought, predation, fire, herbivory, or other disturbances may also preclude presence in a given year. The Project Study Area is located outside of the footprint of recent fires in Sonoma County.

3.4 Special Status Wildlife

In addition to wildlife listed as federal or state endangered and/or threatened, federal and state candidate species, CDFW Species of Special Concern, CDFW California Fully Protected species, USFWS Birds of Conservation Concern, and CDFW Special-status Invertebrates are all considered special-status species. Although these species generally have no special legal status, they are given special consideration under CEQA. The federal Bald and Golden Eagle Protection Act also provides broad protections to both eagle species that are roughly analogous to those of listed species. Bat species are also evaluated for conservation status by the Western Bat Working Group (WBWG), a non-governmental entity; bats named as a "High Priority" or "Medium Priority" species for conservation by the WBWG are typically considered special-status and also considered under CEQA; bat roosts are protected under CDFW Fish and Game Code (CFGC). In addition to regulations for special-status species, most native birds in the United States (including non-status species) are protected by the federal Migratory Bird Treaty Act of 1918 (MBTA) and the CFGC, i.e., sections 3503, 3503.5 and 3513. Under these laws, deliberately destroying active bird nests, eggs, and/or young is illegal.

Seven special-status wildlife species have been documented within a five-mile radius (Appendix A, Figure 3). Based on the presence of biological communities described above, the Project Study Area has the potential to support two of these species; these species are described in Table 2 below.

The remaining species found in the review of background literature were determined to be unlikely to occur due to absence of suitable habitat elements in and immediately adjacent to the Project Study Area. Habitat elements that were evaluated but found to be absent from the immediate area of the Project Study Area or surrounding habitats subject to potential indirect impacts include the following:

- No suitable burrows and/or sandy friable soils on or adjacent to the Project Study Area (e.g., for burrowing owl or American badger).
- Roseland Creek, a channelized, earthen lined creek is adjacent to the Project Study Area however it is shallow and conducts low flows generated by urban runoff throughout most of the dry season. The creek does not provide suitable breeding habitat for California red-

legged frog (CRLF). The only records within a 5-mile radius of the Project Study Area are for CRLF found at different locations on Taylor Mountain about four miles east. There are no records to the west of the Project Study Area and CRLF is considered extirpated from the Santa Rosa Plain. Western pond turtle could forage and bask in Roseland Creek, however there is no suitable nesting habitat on-site.

- There are no trees on Project Study Area parcels and no suitable roosting habitat such as barns, old buildings, or large snags (e.g., for pallid bat [*Antrozous pallidus*], WBWG priority bats).
- The Project Study Area is outside of the breeding range (e.g., western yellow-billed cuckoo [*Coccyzus americanus occidenatlis*]).
- There is no suitable nesting habitat due to the lack of vegetative cover (e.g. tricolored blackbird [*Agelaius tricolor*]).

Table 1. Special Status Wildlife with Potential to Occur in the Study Area

Scientific Name/ Common Name	Status[1]	Habitat	Potential for Occurrence
Amphibians and Reptiles			
Ambystoma californiense California tiger salamander	FE, ST, CH	Lives in vacant or mammal-occupied burrows throughout most of the year; in grassland, savanna, or open woodland habitat. Need underground refuges, and vernal pools or other seasonal water sources for breeding.	**Low Potential.** The Project is within designated critical habitat and has been designated as having potential to affect California tiger salamander (CTS) (USFWS 2020). The Project Study Area provides marginal upland aestivation habitat for nearby CTS populations with a lack of high-quality habitat (abundant burrows), and relatively small amount of potential breeding habitat within the area. The nearest documented breeding habitat is 1,000 feet from the Study Area in the FEMA mitigation area located southwest; there are no adult occurrences within 500 feet.
Birds			
Elanus leucurus White-tailed kite	CFP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	**Low Potential.** The tall trees in the vicinity of the Project Study Area provide suitable nesting habitat for this species. The nearest CNDDB record (#77) is for kites nesting at a location 1.2 miles east of the Project Study Area.

[1] FE/SE – Federal/State Endangered
FT/ST – Federal/State Threatened
CH – Critical Habitat
CFP – California Fully Protected

4.0 POTENTIAL IMPACTS AND MITIGATION

The assessment of impacts under CEQA is based on the change caused by the Project relative to the existing conditions at the proposed Project Study Area. In applying CEQA Appendix G, the terms "substantial" and "substantially" are used as the basis for significance determinations in many of the thresholds but are not defined qualitatively or quantitatively in CEQA or in technical literature. In some cases, the determination requires application of best professional judgment based on knowledge of site conditions as well as the ecology and physiology of biological resources present in a given area. The CEQA and State CEQA Guidelines defines "significant effect on the environment" as "a substantial adverse change in the physical conditions which exist in the area affected by the proposed project." Pursuant to Appendix G, Section IV of the State CEQA Guidelines, the proposed Project would have a significant impact on biological resources if it would:

A. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game [Wildlife] or U.S. Fish and Wildlife Service.

B. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

C. Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

D. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

E. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

F. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

4.1 Potentially Significant Impacts

4.1.1. Sensitive Biological Communities

There are no sensitive biological communities present in the Project Study Area, as such, no impacts would occur, and no mitigation is proposed. There are no jurisdictional aquatic features in the Project Study Area.

4.1.2. Special-Status Plant Species

A total of eighty (80) special-status plant species have been documented within a 9-quadrant search of the Project Study Area and 27 are documented within five miles (Appendix A, Figure 2). No special-status plants were found at the site during floristic spring rare plant surveys conducted in 2022, and none are expected to occur due to absence of suitable wetland habitat, high degree of disturbance, and abundance of non-native plant species.

4.1.3. Special-Status Wildlife Species

A total of forty-six (46) special-status wildlife species have been documented within a 9-quadrant search of the Project Study Area and seven (7) are documented within five miles (Appendix A, Figure 3). A total of 2 of these special status wildlife species have potential to occur within the Project Study Area.

California Tiger Salamander (*Ambystoma californiense*)

California tiger salamander (CTS) requires two primary habitat components: aquatic breeding sites and upland terrestrial aestivation or refuge sites. Adult CTS spend most of their time underground in upland subterranean refugia (Trenham 2001). Underground retreats in the Santa Rosa Plain usually consist of small mammal burrows (namely pocket gophers), but also under logs and piles of lumber (Holland et al. 1990). CTS emerge from underground to breed and lay eggs primarily in vernal pools and other ephemeral water bodies. Adults migrate from upland habitats to aquatic breeding sites during the first major rainfall events, between November and February (Barry and Shaffer 1994) and return to upland habitats after breeding. Following metamorphosis, juvenile CTS may disperse into uplands up to 1.3 miles from breeding ponds (USFWS 2004). Trenham (2001) found up to 25 percent of CTS in one pond were found within 2,200 feet of the breeding pond. In a more recent study Orloff (2011) found both adults and juveniles at least 800 meters (2,624 feet) from the nearest breeding pond, with a smaller number of salamanders as far as 2.2 km (1.3 miles) away.

The Project Study Area is within USFWS designated Critical Habitat for CTS. The Project Study Area is within an area designated as 'may affect listed plants and would likely affect CTS' (CDFG 2007). There are 61 CNDDB records for CTS within a five-mile radius of the Project Study Area with the highest concentrations being immediately south and much fewer occurrences to the west. The nearest documented breeding occurrence (#346) was last observed in 2016 at the FEMA preserve approximately 1,000 feet west of the Project Study Area. CTS could access the

Project Study Area via Roseland Creek with the only barrier from breeding ponds and occurrence records being a housing development immediately south of the Project Study Area and Roseland Creek. The absence of CTS records to the north and high degree of development rules out the possibility of CTS accessing the Project Study Area from the north. Due to the small size of the parcel and lack of direct connectivity to breeding habitat, the project overall has a minimal likelihood to affect CTS. However, given this species may disperse into upland habitats more than one mile from their breeding pool, the potential presence cannot be eliminated and if present, CTS would be subject to direct mortality during construction as a result of the proposed project.

The project would result in removal of 0.27 acre of suitable upland habitat; of which 0.05 is underlain by existing compacted gravel and/or pavement. Both direct mortality and removal of upland habitat (excluding hardscape) is considered significant under CEQA. Given existing barriers that are located to the north of the Project Study Area and lack of breeding habitat, the project would not result in any permanent barrier between documented breeding habitats. Mitigation measures prescribed in Section 4.2 must be implemented to ensure a less than significant effect to CTS.

White-tailed Kite (*Elanus leucurus*)

The white-tailed kite is resident in open to semi-open habitats throughout the lower elevations of California, including grasslands, savannahs, woodlands, agricultural areas, and wetlands. Vegetative structure and prey availability seem to be more important habitat elements than associations with specific plants or vegetative communities (Dunk 1995). Nests are constructed mostly of twigs and placed in trees, often at habitat edges. Nest trees are highly variable in size, structure, and immediate surroundings, ranging from shrubs to trees greater than 150 feet tall (Dunk 1995). This species preys upon a variety of small mammals, as well as other vertebrates and invertebrates.

There are a few tall trees adjacent to the Project Study Area that provide suitable nesting habitat for white-tailed kite, therefore there is a low potential for it to nest in the area, and the project would result in negligible impacts to foraging habitat. Impacts to nesting birds if present is considered significant under CEQA.

Migratory Birds

The Project Study Area is devoid of shrubs and trees; however, the surrounding area provides nesting habitat for birds protected by the federal MBTA and CFGC § 3513. Impacts to nesting birds resulting in nest abandonment or direct mortality to chicks or eggs is considered a significant impact under CEQA.

Wildlife Corridors

There are no barriers preventing terrestrial species from traversing the Project Study Area and it is likely utilized by generalist species adapted to living in urban environments including Columbian black tail deer (*Odocoileus hemionus columbianus*), striped skunk (*Mephitis mephitis*), racoon (*Procyon lotor*), gray fox (*Urocyon cinereoargenteus*), and opossum (*Didelphis virginiana*). Roseland Creek could be used as a dispersal corridor for species that rely on aquatic environments, including western pond turtle (*Emys marmorata*), and pacific tree frog (*Pseudacris regilla*). The proposed project would not prevent wildlife from moving through the area.

4.2 Recommended Avoidance and Minimization Measures

The following measures are recommended to be implemented in the event any of the potential impacts described in Section 4.1 cannot be completely avoided by project design and/or recommended work windows (e.g., vegetation removal between Sept. 1 and Feb. 1.).

BIO-1 Indirect Impacts
The Sonoma County Best Management Practice Guidelines must be employed to ensure impacts to off-site habitats and resources are avoided.

BIO-2. Nesting Birds
To prevent impacts to nesting birds, the following avoidance and minimization measures are recommended:

1. If construction begins between February 1 and August 31, a pre-construction nesting bird (both passerine and raptor) survey of suitable nesting habitats within 200 feet of all work areas shall be performed within 7 days of groundbreaking. If no nesting birds are observed, no further action is required. A follow up survey is required if a stoppage in work occurs for longer than 7 days between February 1 and July 1.

2. If active bird nests (passerine and/or raptor) are observed during the pre-construction survey, a disturbance-free buffer zone shall be established around the nest tree(s) until the young have fledged or the nest has naturally failed or been predated, as determined by a qualified biologist. The radius of the required buffer zone can vary depending on the species, with the dimension of any required buffer zone to be determined by a qualified biologist.

BIO-3. California Tiger Salamander
Given the close proximity of CTS occurrences, the following avoidance and minimization measures are recommended to ensure that the project does not result in the take of CTS:

1. Develop and implement an approved erosion and sediment control plan to prevent impacts of construction on habitat outside the work areas.

2. Consultation with either USFWS or CDFW is required for impacts to California tiger salamander and its habitat; an incidental take permit (ITP) may also be required.
3. All prescribed avoidance and minimization measures set forth in the ITP shall be implemented on this project.
4. In accordance with the Conservation Strategy and/or PBO, impacts must be mitigated at a 2:1 ratio for Projects that are greater than 500 feet but within 2,200 feet of a known breeding site. Based on this, a total of 0.22 acre of CTS upland habitat (less already paved/compacted gravel areas from the prior airstrip) would need to be mitigated for at either an approved CDFW conservation bank or through the acquisition of CDFW approved permitted-responsible mitigation lands elsewhere on the Santa Rosa Plain.

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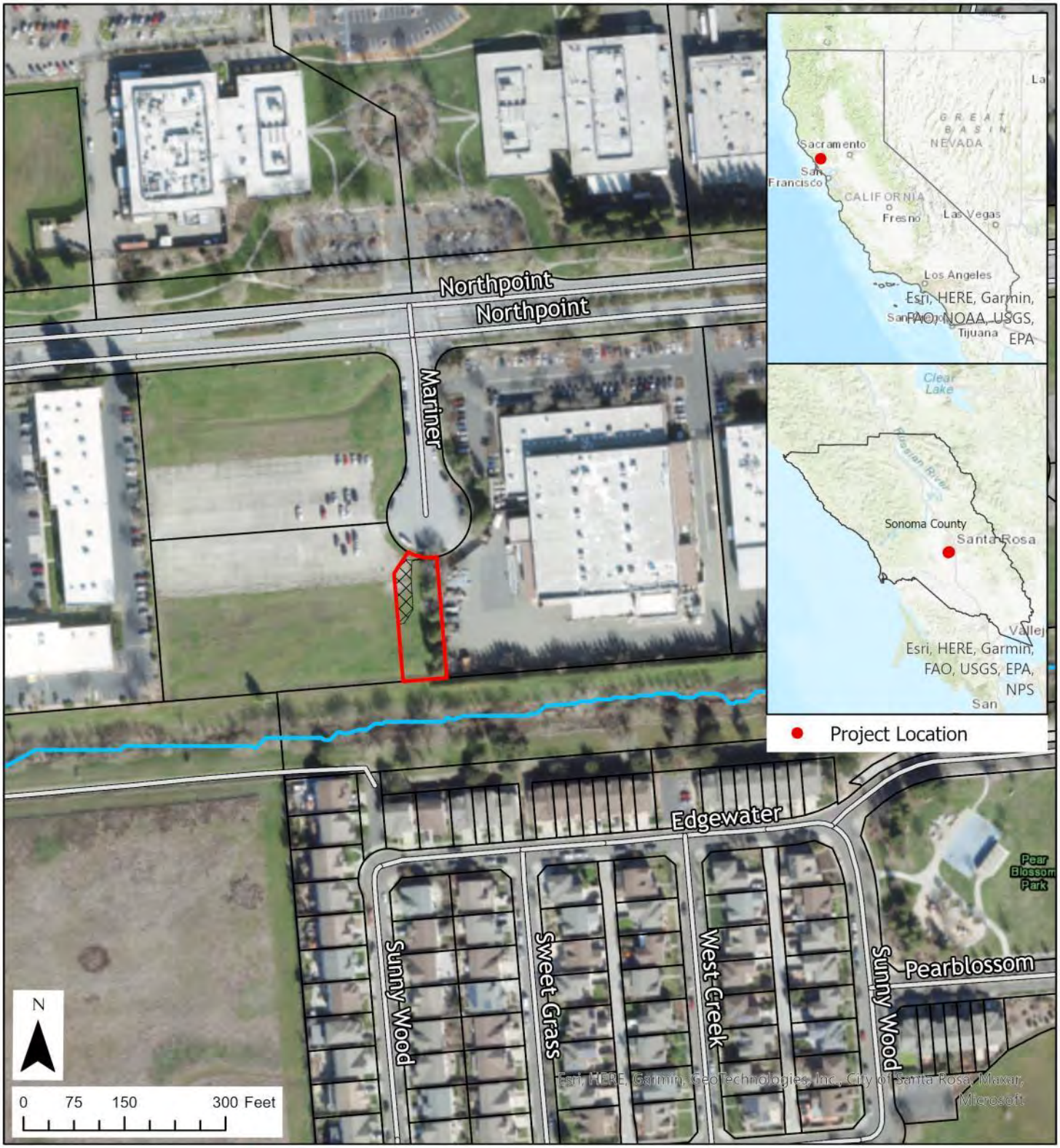
APPENDIX A

PROJECT FIGURES: SITE LOCATION MAP, AND CNDDB DATABASE RESULTS

Figure 1: Location of Project Area

Mariner Way Parking Lot, Mariner Way, Santa Rosa, CA 95407



Date: 9-21-2022
Data: Sol Ecology Inc., Sonoma Co.

Base: ESRI
GIS: JC 2216

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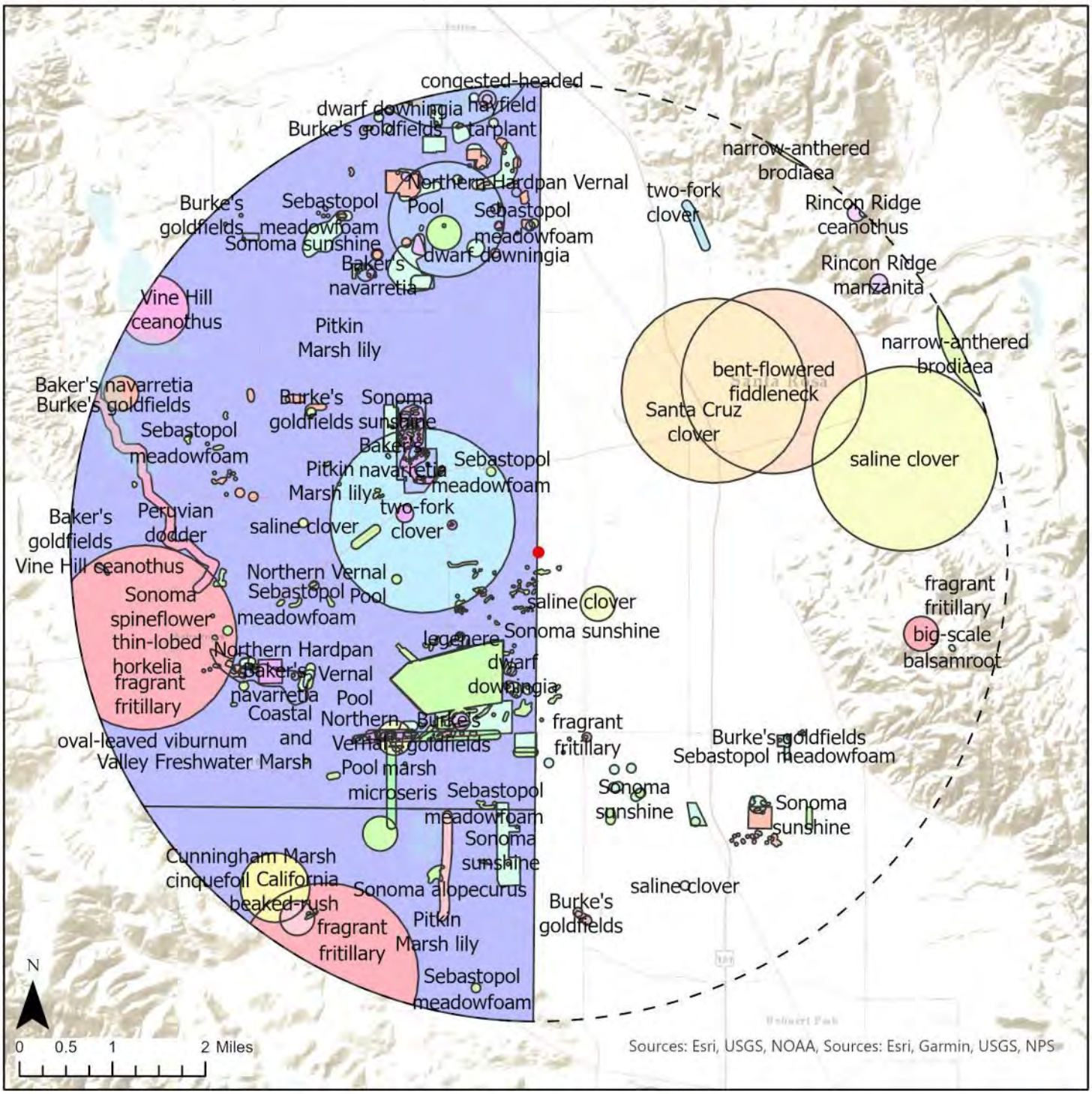
solecology.com

Figure 2: Special Status Plant Species within 5 Miles of the Project Site

Mariner Way Parking Lot, Mariner Way, Santa Rosa, CA 95407



- Project Location
- 5 Miles
- Baker's goldfields (1)
- Baker's navarretia (8)
- Burke's goldfields (21)
- California beaked-rush (1)
- Cunningham Marsh cinquefoil (1)
- Peruvian dodder (1)
- Pitkin Marsh lily (3)
- Rincon Ridge ceanothus (1)
- Rincon Ridge manzanita (2)
- Santa Cruz clover (1)
- Sebastopol meadowfoam (36)
- Sonoma alopecurus (2)
- Sonoma spineflower (1)
- Sonoma sunshine (15)
- Vine Hill ceanothus (2)
- bent-flowered fiddleneck (1)
- big-scale balsamroot (1)
- congested-headed hayfield tarplant (5)
- dwarf downingia (9)
- fragrant fritillary (4)
- legenere (1)
- marsh microseris (1)
- narrow-anthered brodiaea (2)
- oval-leaved viburnum (1)
- saline clover (5)
- thin-lobed horkelia (1)
- two-fork clover (2)

Date: 9-21-2022
Data: Sol Ecology Inc., Sonoma Co., CDFW

Base: ESRI
GIS: JC 2216

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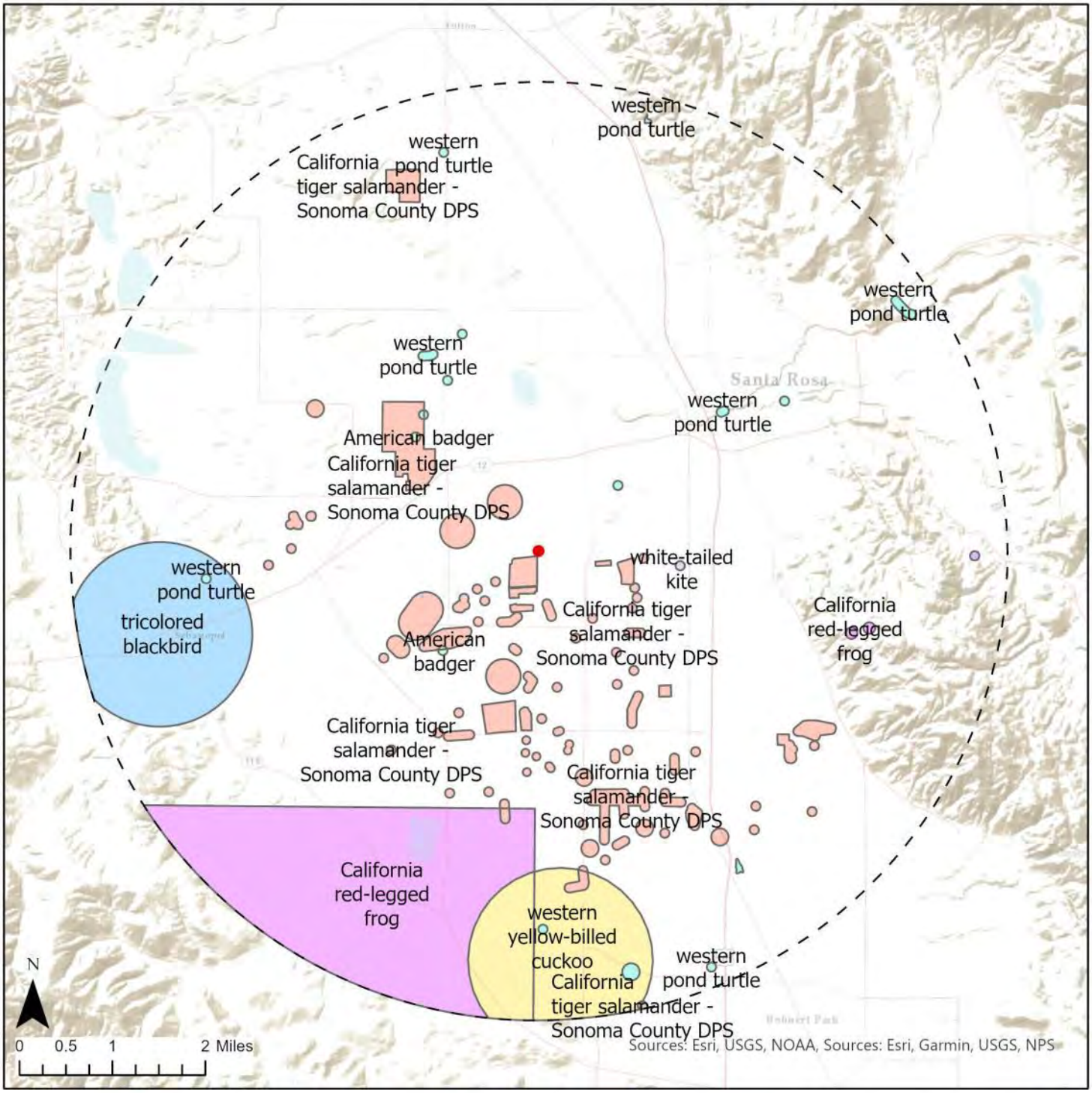
Figure 3: Special Status Wildlife Species within 5 Miles of the Project Site
Mariner Way Parking Lot, Mariner Way, Santa Rosa, CA 95407



- Project Location
- 5 Miles
- American badger (2)
- California red-legged frog (3)
- California tiger salamander - Sonoma County DPS (61)
- tricolored blackbird (1)
- western pond turtle (15)
- western yellow-billed cuckoo (1)
- white-tailed kite (1)

Date: 9-21-2022
Data: Sol Ecology Inc., Sonoma Co., CDFW

Base: ESRI
GIS: JC 2216

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APPENDIX B

OBSERVED SPECIES TABLES

Morgan Stickrod

3/24/22

Mariner Parking Lot (2216) Vascular Plant Species List

***=non-native**

Asteraceae	
**Helminthotheca echioides*	Bristly ox-tongue
**Hypochaeris glabra*	Smooth cats ear
**Hypochaeris radicata*	Hairy cats ear
**Senecio vulgare*	Common groundsel
Brassicaceae	
**Raphanus sativus*	Wild radish
Caryophyllaceae	
**Stellaria neglecta*	Chickweed
Dipsacaceae	
**Dipsacus sativus*	Fuller's teasel
Fabaceae	
**Lotus corniculatus*	Bird's foot trefoil
Lupinus bicolor	Annual lupine
**Vicia sativa*	Spring vetch
Geraniaceae	
**Erodium brachycarpum*	White-stemmed filaree
**Geranium dissectum*	Wild geranium
Montiaceae	
Calandrinia menziesii	Redmaids
Orobanchaceae	

Triphysaria versicolor ssp. *faucibarbata* Yellow owl's clover

Plantaginaceae

**Plantago lanceolata* Ribwort

Poaceae

**Avena fatua* Wildoats

**Briza minor* Little rattlesnake grass

**Festuca perennis* Italian rye grass

Hordeum brachyantherum Meadow barley

Polygonaceae

**Rumex acetosella* Sheep sorrel

**Rumex crispus* Curly dock

OBSERVED WILDLIFE SPECIES
MARCH 24, 2022
Observer: Sandra Etchell

Scientific Name	**Common Name**
Birds	
Sialia mexicana	Western bluebird
Mimus polyglottos	Northern mockingbird
Corvus corax	Common raven
Corvus brachyrhynchos	American crow
Melospiza melodia	Song sparrow
Agelaius phoeniceus	Red-winged blackbird
Euphagus cyanocephalus	Brewer's blackbird
Spinus psaltria	Lesser goldfinch
Mammals	
Thomomys bottae	Botta's pocket gopher

Attachment B:
Cultural Resources Supporting Information

This attachment contains sensitive information relating to cultural resources and is not intended for public distribution pursuant to Public Resources Code Section 21082.3(C)(2). A copy of confidential Attachment B is on file with the City of Santa Rosa and is available to qualified professionals upon request.