

Attachment 3: Public and Agency Comments Received on Kelly Farm Mitigation Bank Initial Study and Mitigated Negative Declaration (SCH# 2026010639)

The Initial Study / Proposed Mitigated Negative Declaration (ISMND) was published on CEQAnet on January 21, 2026, to circulate for review by State agencies until February 19th. One state agency provided written comments: California Department of Conservation.

The City mailed the Notice of Intent to Adopt to parcel addresses and property owners within 300 feet of the project site on January 16, 2026. Three neighbors responded to the notice by calling the City Project Manager and providing comments on the project. Some comments were not related to the ISMND.

The following is a summary of the comments and responses to each, and any subsequent actions taken by the City.

California Department of Conservation (Letter dated February 9, 2026)

Summary: The focus of the letter provided guidance on the environmental review for the loss or conversion of agricultural land and provided suggestions for mitigating such a loss.

Response: The ISMND stated the Project would result in a conversion of agricultural land to non-agricultural use based on its primary land use change. That is, ceasing hay production in support of a mitigation bank. However, the site would remain undeveloped and as part of the *Interim Management Plan* and the *Long-term Management Plan* for bank operation, the site would be leased to a local rancher for cattle grazing to control invasive species. In this context, the Project would not convert Prime Farmland to a non-agricultural use. The use would simply shift from dry hay production to cattle grazing. No mitigation would be required.

Mel Sanchietti, 1115 Irwin Lane (via email and phone call)

Comment Summary: Mr Sanchietti, owner of a vineyard on Occidental Road, emailed the City, followed by a phone conversation, to express concern regarding how the City obtained the property and the purpose at that time for irrigation with recycled water. He questioned if the City is doing the right thing by converting the site to a mitigation bank.

Response: The comment questions the desirability of the use from a policy perspective, which is not a CEQA consideration. In 1979, the City acquired the Kelly Farm property by grant deed without any limitation on use. The acquisition was for the disposal of recycled water through irrigation. Now, the City proposes a 99-acre mitigation bank on the property. The mitigation bank is generally consistent with the property's intended use. First, a recycled water line will continue to exist on the property. Second, the mitigation bank will only be used for Santa Rosa Water Projects, thus continuing to support the recycled water operations of the City. Lastly, the mitigation bank itself will help to facilitate the City's operations of treating wastewater and making necessary improvements, which necessitate mitigation. Regardless, however, there is nothing prohibiting an agency, once it has acquired property, to alter the property's public use.

Further, development of the mitigation bank, which is intended to preserve the California tiger salamander (CTS) and wetland habitats on the property, has a myriad of benefits for the City. The project will greatly reduce the cost of maintenance and asset upgrades that require mitigation, increase the City's ability to access credits when needed, and support management of existing city-owned lands. With each credit equivalent to one acre of protection, the project would create almost 84 acres of CTS upland credits, just under one acre of CTS wetland credits, and over 8 vernal pool/wetland credits. If the project is not built, the Santa Rosa Water Department would need to compete with private development for available mitigation credits, which could increase costs and delays. The project would greatly reduce the cost of compliance with state and federal laws, with estimates showing that Santa Rosa Water and its rate payers would save tens of millions of dollars.

Kim Gantman, 5400 Occidental Road (via phone call):

Comment Summary: Mr. Gantman called the City to discuss his concerns about the project, indicating he and several neighbors are concerned with biosolids or manure spreading at the project site and impacts of a "cattle ranch" on his water supply and the Laguna de Santa Rosa. His property is surrounded on three sides by Kelly Farm. He is also concerned about the proposed water supply well and the large quantity of water that will be extracted impacting the neighboring property owners who have well water supply.

Mr. Gantman expressed general concerns about invasive Mediterranean Oak Borer (MOB) and how it impacts oak trees in the area and likely at Kelly Farm. He informed the City of a seminar (in March by the Sonoma County Forest Advisor) that he believes staff from the City should attend.

Finally, he suggested that we use wildlife friendly fencing due to wildlife in the area (bobcats, mountain lions, etc.) versus barbed wire fencing. He wanted to know further details regarding management of the property.

Response: The City emailed the ISMND, the Grazing Management Plan, and a link to the project website, on February 3, 2026. Mr. Gantman was also notified of the of the Board of Public Utilities meeting scheduled for March 5th at City Hall in Santa Rosa, at which the Board will consider adopting the MND.

Neither biosolids nor manure application is a proposed activity associated with management of the Kelly Farm Mitigation Bank. As noted in Section 1.4, Project Description, of the ISMND, it is estimated that the site could support between 25 and 50 cattle. It is not currently known the timing and duration each year that cattle would be present, though it is anticipated it would be during winter and spring when foraging opportunities are suitable.

As noted in Section 10, Hydrology and Wate Quality, of the ISMND, operation of the Project would utilize a small 6-inch groundwater well as a water source during managed grazing. For certain times of the year, it is anticipated cattle would be used to graze the Project site as part of the vegetation management plan. Water usage can vary depending on the time of year. During hot summer days, cattle could use up to 1,000 gallons per day (assuming a herd of 50, each drinking 20 gallons). This small periodic usage would not be expected to impede sustainable groundwater management of the basin.

The original design incorporated wildlife friendly fencing. However, this was not conducive to containing cattle within the site as part of the vegetation management plan. Review of the proposed fencing by a local cattle rancher, as well as a professional range manager, both recommended 5-strand barbed wire.

Deborah Yeakey, 5440 Occidental Road (via phone call)

Comment Summary: Ms. Yeakey called to express concerns about her experience with nearby projects, and that the Kelly Farm Mitigation Bank Project could result in similar concerns.

Response: After discussing the project details with the City Project Manager, Ms. Yeakey did not have any remaining concerns. Ms. Yeakey was also referred to the project website for additional information.