

## MEMORANDUM

**DATE:** July 22, 2024

**To:** Luana Vaetoe, Chief Executive Officer, Becoming Independent

**FROM:** Florentina Craciun, AICP, Associate/Senior Environmental Planner  
Lauren Peachey, Environmental Planner

**SUBJECT:** 1455 Corporate Center Parkway (Becoming Independent) Project CEQA Consistency Analysis per *State CEQA Guidelines* Section 15183

## INTRODUCTION

The following is an evaluation of the proposed 1455 Corporate Center Parkway Project's (project) consistency with the scope of analysis provided in the program Environmental Impact Report (EIR)<sup>1</sup> prepared for the Santa Rosa General Plan 2035<sup>2</sup> (General Plan EIR), certified in November 2009 by the City of Santa Rosa (City). The purpose of this analysis is to determine whether the proposed project is within the scope of the General Plan EIR, including whether the proposed project is consistent with the General Plan EIR and whether the proposed project would result in any potential impacts from construction/operations of the proposed project that were not previously analyzed in the General Plan EIR or that are peculiar to the project site, pursuant to *State California Environmental Quality Act (CEQA) Guidelines* Section 15183.

## PURPOSE OF THE CEQA GUIDELINES SECTION 15183 CONSISTENCY ANALYSIS

A project requiring discretionary approval may use a certified EIR to comply with CEQA if the project area is encompassed by and consistent with the certified EIR. The City may determine whether the project is exempt from further environmental review or whether a supplemental or subsequent EIR is required. The CEQA statute and the *State CEQA Guidelines* provide guidance in this process by requiring an examination of whether, since the certification of the EIR, changes in the project or conditions have been made to an extent that the proposal may result in substantial changes in physical conditions that are considered significant under CEQA. If so, the City would be required to prepare a subsequent or supplemental EIR. The examination of impacts is the first step taken by the City in reviewing the CEQA compliance process of the project.

CEQA provides, in Public Resources Code Section 21083.3, that if a parcel was zoned to accommodate a particular density of development or was designated in a community plan to accommodate a particular density of development and an EIR was certified for that zoning or

<sup>1</sup> City of Santa Rosa. 2009. *Draft Santa Rosa General Plan 2035 Environmental Impact Report*. March.

<sup>2</sup> City of Santa Rosa. 2009. *Santa Rosa General Plan 2035*. November 3.

planning action, the application of CEQA to the approval of other projects that are consistent with the zoning or community plan “shall be limited to effects upon the environment which are peculiar to the parcel or to the project and which were not addressed as significant effects in the prior environmental impact report, or which substantial new information shows will be more significant than described in the prior environmental impact report.” In accordance with this provision, *State CEQA Guidelines* Section 15183 (Projects Consistent with a Community Plan, General Plan, or Zoning) provides that projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.

These provisions streamline the review of such projects and reduce the need to prepare repetitive environmental studies. Pursuant to *State CEQA Guidelines* Section 15183, the public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:

1. Are peculiar to the project or the parcel on which the project would be located;
2. Were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent;
3. Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action; or
4. Are previously identified significant effects which, as a result of substantial new information not known at the time of EIR certification, are determined to have a more severe adverse impact than discussed in the prior EIR.

In addition, in accordance with CEQA, as set forth in Public Resources Code Section 21166 and *State CEQA Guidelines* Section 15162, no subsequent or supplemental EIR shall be required unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was adopted, shows any of the following:

- a. The project will have one or more significant effects not discussed in the previous EIR;
- b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative. (*State CEQA Guidelines* Section 15162(a); see also Public Resources Code Section 21166).

## SANTA ROSA GENERAL PLAN 2035 ENVIRONMENTAL IMPACT REPORT

The Santa Rosa General Plan EIR was certified in November 2009. The General Plan EIR analyzed the potential environmental impacts associated with buildout of the Santa Rosa General Plan 2035, which replaced the previous General Plan 2030 in all elements, focusing on the Housing Element, and would be used to guide development-related decisions in the city. The General Plan 2035 would be implemented through the City's zoning code standard and design review to promote controlled housing growth to meet regional housing needs.

## PROJECT SITE

The project site is located at 1455 Corporate Center Parkway (Assessor's Parcel Number [APN] 035-530-044) in the City of Santa Rosa, Sonoma County. Most of the 3.77-acre parcel is currently developed with a commercial building that houses the nonprofit organization Becoming Independent, associated surface parking, and a landscaped garden area. The 1.26-acre project site is located in the western portion of the parcel and is relatively flat except for a graded berm and sidewalk along Northpoint Parkway, and elevations range from approximately 102 to 107 feet above mean sea level. The site is comprised mostly of non-native grassland, small seasonal wetlands, and several storm water drainage structures (drain inlets). There are three seasonal wetlands on the project site that are jurisdictional features<sup>3</sup> and drain via three storm drain inlets; these drains outfall to a tributary to the Laguna de Santa Rosa. The project site is considered potential upland habitat for California tiger salamanders (CTS). The project site is within 1.3 miles of known CTS breeding sites; however, no potential breeding habitat is present on the site.<sup>4</sup>

The site is designated as General Industry in the City's General Plan 2035 and is within the General Industrial (IG) zoning district. The project site is bound by a commercial building and undeveloped land to the north, Corporate Center Parkway to the east, Northpoint Parkway to the south, and

<sup>3</sup> Department of the Army, San Francisco District, United States Army Corps of Engineers. 2024. File No. SPN-2023-00355. February 15.

<sup>4</sup> LSA. 2024. 2081 Incidental Take Permit Application, Becoming Independent Parking Lot Project, City of Santa Rosa, Sonoma County, California. July.

vacant/undeveloped land to the west. Access to the project site is provided by two driveways, one from Corporate Center Parkway and the other from Northpoint Parkway.

## PROPOSED PROJECT

The proposed project would expand the parking facilities on the project site by adding 60 new parking spaces on 20,470 square feet (0.47 acre), to serve the existing Becoming Independent facility (social services organization). The new paved asphalt parking lot would be constructed on the unpaved lot located west of the existing parking lot and would connect to it. The project does not include any expansion of use for the existing facilities, which is experiencing parking shortages for its existing users. Figure 1 depicts the proposed project's conceptual plan (see Attachment B).

Because of the proximity to CTS breeding sites and the potential presence of CTS at the project site, the proposed project also includes the installation of a 9-inch-high concrete curb on the outside edge of the parking area designed to exclude CTS (and other small terrestrial wildlife) from the parking area.<sup>5</sup> In addition, during construction, a wetland protection fence/wildlife exclusion fence would surround the perimeter of the project site.

The proposed project would also remove four existing trees located along the west side of the proposed parking lot. These trees are not considered protected trees and would not be replaced as part of the proposed project.

The project would manage stormwater on site to minimize changes in downstream conditions. Water quality treatment measures such as bio-swales would be incorporated into the site design to filter contaminants prior to discharge. The water quality treatment measures would include four bioretention basins totaling 1,609 square feet in area to filter contaminants prior to discharge via the 12-inch, 42-foot drainpipe. Detention basins would be constructed such that the post-development peak flows are 90 percent of the pre-development peak flows in a 15- and 100-year event, pursuant to City of Santa Rosa standards. High frequency storm flows such as 2- and 5-year events would be kept as close to pre-development flows as possible.

Stormwater collected on the project site would flow to an existing shallow linear basin constructed parallel to Northpoint Parkway, which drains into a slightly elevated concrete drain inlet at its western end; the flat grassland area to the north drains into this shallow basin. Another stormwater drain inlet surrounded by a rock apron is located just west of the Northpoint Parkway driveway into the Becoming Independent parking area. Both inlets drain to underground storm water piping under Northpoint Parkway, which ultimately drain southward into realigned segments of an intermittent blue-line creek that is tributary to the Laguna de Santa Rosa approximately 3 miles southwest of the study site. The Laguna de Santa Rosa drains northwestward to Mark West Creek and then to the Russian River, approximately 9 miles northwest of the study site.

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<sup>5</sup> The entire concrete curb would be 24 inches; however, only 9 inches of curb would be exposed above ground.

Construction of the proposed project is expected to occur over approximately 6 months and is planned to begin in summer 2024 and continue into the fall of 2024.

The following permits would be required for the proposed project:

- 2081 Incidental Take Permit

## **GENERAL PLAN EIR AND PROPOSED PROJECT IMPACT COMPARISON EVALUATION**

This analysis provides a summary of the environmental analysis from the General Plan EIR, addresses potential impacts associated with the proposed project, describes whether the proposed project is within the scope of the General Plan EIR such that no further environmental review is required, and whether the proposed project would be consistent with the findings of the General Plan EIR. See Table A, below.

This analysis is intended to provide a general overview that supports the City's findings that the proposed project is within the scope of the General Plan EIR and consistent with the General Plan EIR such that no additional environmental review is required pursuant to CEQA.

### **Effects Found Not to be Significant**

Based on the General Plan EIR, implementation of the General Plan 2035 would result in no impact, and would not require mitigation measures, on the following resource area:

- Mineral Resources

As such, this issue area was not analyzed further in the General Plan EIR. Based on the proposed location and project details as outlined above, the proposed project would not change the findings of no impact associated with mineral resources, as determined by the General Plan EIR.

### **EIR Impact Analysis Summary for Impacts Requiring Mitigation**

Table B below includes an analysis of potential project impacts as they relate to the following resource areas and specific thresholds that were identified to result in potentially significant impacts prior to mitigation. With the mitigation identified in the General Plan EIR, and outlined in the table below, potential project impacts would be reduced to a less than significant level.

The topic of biological resources is discussed as a stand-alone section of the proposed project impact comparison evaluation because the project site's sensitivity related to special-status species is a condition that is peculiar to the project site and therefore warrants further analysis. However, based on the analysis presented below the proposed project would not result in more significant or new impacts associated with biological resources than what was analyzed in the General Plan EIR.

## Biological Resources

### Special-Status Species and Significant Habitat Areas

To establish existing conditions related to biological resources, the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB)<sup>6</sup> was reviewed for lists of special-status species that are known to occur or potentially occur on the project site. Table B provides the special-status species known to occur or potentially occur on the project site.

**Table A: Special-Status Species Known to Occur or Potentially Occur on the Project Site**

Species	CDFW Status <sup>1</sup>	Habitat	Assessment of Occurrence
<b>Amphibians</b>			
California tiger salamander <i>Ambystoma californiense</i> Sonoma County DPS	T	Grasslands, rangelands, and prairie habitats that include vernal pools or similar seasonal wetlands that typically pond water for three to four months per year.	Potential: No breeding habitat on the project site. The project site is within the 1.3-mile maximum dispersal distance from the breeding ponds and may serve as a movement and/or upland habitat.
<b>Plants</b>			
Sonoma sunshine <i>Blennosperma bakeri</i>	E	Valley and foothill grassland (mesic), vernal pools. Blooms February to April.	Protocol rare plant surveys conducted 2023 and 2024; this species was not found.
Burke's goldfields <i>Lasthenia burkei</i>	E	Meadows and seeps (mesic), vernal pools. Blooms April to June.	Protocol rare plant surveys conducted 2023 and 2024; this species was not found.
Sebastopol meadowfoam <i>Limnanthes vinculans</i>	E	Meadows and seeps, valley and foothill grassland, vernal pools. Blooms April to May	Protocol rare plant surveys conducted 2023 and 2024; this species was not found.
Many-flowered navarretia <i>Navarretia leucocephala</i> ssp. <i>plieantha</i>	E	Vernal pools (volcanic ash)	Protocol rare plant surveys conducted 2023 and 2024; this species was not found.

Source: CNDDDB, CDFW (LSA 2024).

<sup>1</sup> CDFW Status Definitions.

CDFW = California Department of Fish and Wildlife

CNDDDB = California Natural Diversity Database

DPS = distinct population segments

E = Endangered (legally protected)

T = Threatened (legally protected)

**Listed Plants.** Botanical surveys following CDFW guidelines were conducted on the project site on April 5 and 7 and May 8, 2023, and April 11, 2024. The focus species of the botanical survey included Sonoma sunshine, Burke's goldfields, Sebastopol meadowfoam, and many-flowered navarretia;

<sup>6</sup> California Department of Fish and Wildlife (CDFW). 2022. California Natural Diversity Database, commercial version dated April 30, 2022. Biogeographic Data Branch, Sacramento.

none of these species were found on the project site, and the proposed project would have no impact on these plants.

**California Tiger Salamander.** There is no suitable CTS breeding habitat within the boundaries of the project site or in the vicinity of the site. The wetlands on site do not pond to the depths or for the time durations needed for successful CTS breeding. However, the burrows of Botta's pocket gophers on the project site provide potential upland habitat for CTS.

The project site is also within the maximum CTS dispersal distance of 1.3 miles from known breeding sites. The closest confirmed CTS breeding site is 0.63 mile west of the project site and the closest potential breeding habitat is 0.2 mile to the southwest. Given that the project site is located within potential dispersal distance of a known/potential breeding sites, the project may affect CTS.

The proposed project would expand the parking facilities on the project site, which has the potential to impact upland habitat for CTS. All permanent direct impacts of the proposed project would be within the non-native grassland habitat. A total of 0.51-acre of potential CTS upland habitat would be directly and permanently impacted by development of the proposed project from construction of the parking lot and bioretention basin. The approximate 0.71-acre area to the north, west, and south of the area of direct project impacts would not be impacted by direct cut and fill activities; however, this area would be considered indirectly impacted with respect to long-term habitat suitability for CTS due to proximity to project activities.

As discussed in the Santa Rosa Plain Conservation Strategy,<sup>7</sup> projects and other activities would generally be required to adopt measures to minimize their potential direct and indirect effects on CTS. As provided in the Santa Rosa Plain Conservation Strategy, for activities that may impact CTS upland habitat, fencing would be installed to exclude CTS from entering the project site prior to construction activities. Consistent with this requirement, the proposed project includes the installation of a 9-inch concrete curb and permanent fence designed to exclude CTS (and other small terrestrial wildlife) from the parking area. In addition, a wetland/wildlife protection fence would surround the proposed parking lot during project construction.

General Plan 2035 Policy OSC-D-3, which requires the preservation and restoration of elements of wildlife habitat within the city, would be applicable to the proposed project. In addition, in order to address potential impacts to biological resources with implementation of the General Plan 2035, the General Plan EIR prescribed Mitigation Measure 4.F-5, as provided below.

OSC-D-3: Preserve and restore the elements of wildlife habitats and corridors throughout the Planning Area.

**Mitigation Measure 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

<sup>7</sup> City of Santa Rosa. 2005. *Santa Rosa Plain Conservation Strategy*. December 1.

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.

Consistent with Mitigation Measure 4.F-5, the following minimization measure and mitigation measure prescribed in the Santa Rosa Plain Conservation Strategy would be applicable to the proposed project.

**Santa Rosa Plain Conservation Strategy Minimization Measure 1.** Generally, the following minimization measures will be implemented, as appropriate, depending on the specific site situation:

- A. A USFWS approved biological monitor will be on site each day during wetland restoration and construction, and during initial site grading of development sites where CTS have been found.
- B. The biological monitor will conduct a training session for all construction workers before work is started on the project.
- C. Before the start of work each morning, the biological monitor will check for animals under any equipment such as vehicles and stored pipes. The biological monitor will check all excavated steep-walled holes or trenches greater than one foot deep for any CTS. CTS will be removed by the biological monitor and translocated as described in Section 4.7.2.
- D. An erosion and sediment control plan will be implemented to prevent impacts of wetland restoration and construction on habitat outside the work areas.
- E. Access routes and number and size of staging and work areas will be limited to the minimum necessary to achieve the project goals. Routes and boundaries of the roadwork will be clearly marked prior to initiating construction/grading.
- F. All foods and food-related trash items will be enclosed in sealed trash containers at the end of each day, and removed completely from the site once every three days.
- G. No pets will be allowed anywhere in the project site during construction.
- H. A speed limit of 15 mph on dirt roads will be maintained.
- I. All equipment will be maintained such that there will be no leaks of automotive fluids such as gasoline, oils, or solvents.
- J. Hazardous materials such as fuels, oils, solvents, etc., will be stored in sealable containers in a designated location that is at least 200 feet from aquatic habitats. All fueling and maintenance of vehicles and other equipment and staging areas will occur at least 200 feet from any aquatic habitat.



- K. Grading and clearing will typically be conducted between April 15 and October 15, of any given year, depending on the level of rainfall and/or site conditions.
- L. Project areas temporarily disturbed by construction activities will be re-vegetated with native plants approved by USFWS/CDFW.

**Santa Rosa Plain Conservation Strategy Mitigation Measure 1.** Compensatory mitigation for project impacts will consist of upland preservation, enhancement, and restoration, and is designed to follow the compensatory mitigation ratios prescribed in the Santa Rosa Plain Conservation Strategy. The proposed project would be required to compensate for impacts on CTS upland habitat at a ratio of two acres of mitigation to every one acre of impact (2:1) for the whole 1.26-acre project site.

In addition, the proposed project would include a Section 2081 Incidental Take Permit (ITP) to comply with the California Endangered Species Act (CESA) Authorization Process (Title 14, Section 783.2) and to provide the required documentation for the proposed project.

With compliance with General Plan 2035 Policy OSC-D-3, implementation of Mitigation Measure 4.F-5, and certification of the project-specific ITP, impacts to CTS with implementation of the proposed project would be **less than significant with mitigation**.

Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
<b>A. Land Use Consistency and Compatibility</b>			
The proposed project would construct an additional 60 parking spaces to serve the existing use and would not change or increase the capacity of the existing use at the site. The proposed project would not alter or impact zoning or land-use practices. In addition, due to the nature of the proposed project (expanded parking facilities), the proposed project would not be subject to the General Plan 2035 policies required to reduce conflicts with surrounding land uses identified in the General Plan EIR. Therefore, no mitigation measures or General Plan 2035 policies apply to the proposed project, and the proposed project would have <b>no impact</b> as it relates to land use consistency and compatibility.			
<b>B. Population, Housing, and Employment</b>			
The proposed project is intended to serve the existing use at the project site and would not induce a substantial population or employment growth at the project site or within the city, as it would not expand use. Therefore, implementation of the proposed project would result in <b>no impacts</b> associated with population, housing, and employment, consistent with the General Plan EIR.			
<b>C. Transportation and Circulation</b>			
Traffic and Level of Service Standards	<u>Impact 4.C-1:</u> Implementation of the proposed Santa Rosa General Plan 2035 would result in increased traffic volumes, delay, and a decrease in LOS on area intersections during the peak hours. Implementation of the policy provisions outlined the proposed General Plan 2035, including T-A, T-A-1 through T-A-6, T-B, T-B-1 through T-B-4, T-C, T-C-1 through T-C-4, T-D, T-D-1 through T-D-5, T-E, T-E-1 through T-E-3, T-F, and T-F-1 through T-F-3, together with improvements to the transportation network when funding becomes available would provide for acceptable operation and capacity on most roadways in the city. However, because it cannot be assumed that additional funding sources will be available within the General Plan 2035 timeframe to mitigate capacity deficiencies on all the roadways, this impact is <b>significant and unavoidable</b> .	<u>Consistent.</u> The proposed project is intended to serve the existing use at the project site and is not anticipated to result in a substantial increase in traffic volumes, delays, or a decrease in LOS on intersections in the surrounding area during the peak hours because it would not expand current use. In addition, General Plan 2035 Policy T-E-2 would be applicable to the proposed project and would ensure impacts would be <b>less than significant</b> .	None recommended beyond implementation of General Plan 2035 Policy T-E-2, if the City deems such fees are needed for the project.  <u>T-E-2:</u> Require development projects to pay a fair share of costs for transportation system improvements. Periodically update the city's impact fees to assure the adequacy of funding for needed transportation system improvements.

**Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation**

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
Transit Service	<u>Impact 4.C-2:</u> Implementation of the proposed Santa Rosa General Plan 2035 would result in an increased demand for transit service. However, implementation of General Plan 2035 policies, including T-H, T-H-1 through T-H-5, T-H-8, T-I, T-I-1, and T-I-2, would provide for continued and expanded transit service opportunities and would reduce potential transit impacts to <b>less than significant</b> .	<u>Consistent.</u> The proposed project is intended to serve the existing use at the project site and is not anticipated to result in a substantial increase in demand for transit service. In addition, the proposed project would not be subject to the General Plan 2035 policies required to reduce potential transit impacts. Impacts would be <b>less than significant</b> .	No applicable mitigation measures or General Plan 2035 policies.
Bicycle and Pedestrian Facilities	<u>Impact 4.C-3:</u> Implementation of the proposed General Plan 2035 would result in an increased demand for bicycle and pedestrian facilities. However, implementation of the Bicycle and Pedestrian Master Plan and General Plan 2035 policies, including UB-B-7, UD-B-8, UD-D-2, UD-D-4, UD-D-5, UD-G-2, UD-G-9, T-H-1, T-J, T-J-1 through T-J-3, T-K, T-K-1 through T-K-6, T-L, and T-L-1 through T-L-9, would provide for continued and improved pedestrian and bicycle opportunities and would reduce potential impacts to bicycle and pedestrian facilities to <b>less than significant</b> .	<u>Consistent.</u> The proposed project is intended to serve the existing use at the project site and is not anticipated to result in a substantial increase in demand on pedestrian and bicycle facilities. In addition, the proposed project would not conflict with implementation of the City's Bicycle and Pedestrian Master Plan and would not be subject to the General Plan 2035 policies required to reduce potential impacts to bicycle and pedestrian facilities. Impacts would be <b>less than significant</b> .	No applicable mitigation measures or General Plan 2035 policies.
Roadway Safety and Emergency Access	<u>Impact 4.C-4:</u> Implementation of the proposed Santa Rosa General Plan 2035 would result in an increase in traffic volumes, which would increase the potential opportunities for safety conflicts. However, implementation of the policy provisions to maintain roadways and improve traffic flow in	<u>Consistent.</u> The proposed project is intended to serve the existing use at the project site and is not anticipated to result in a substantial increase in traffic volumes. In addition, the proposed project would not modify any	No applicable mitigation measures or General Plan 2035 policies.

**Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation**

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	the proposed General Plan 2035, in conjunction with enforcement of modern design standards in the construction of new roadway facilities, would ensure that construction of roadway facilities associated with the proposed General Plan 2035 would not result in unacceptable safety conflicts. Impacts would be <b>less than significant</b> .	roadways. Impacts would be <b>less than significant</b> .	
Parking Demand	<u>Impact 4.C-5:</u> Implementation of the proposed Santa Rosa General Plan 2035 would result in an increase in parking demand due to additional residential and non-residential vehicle trips. However, the City's development review process implements parking requirements that are intended to ensure that adequate numbers of parking spaces are provided. In addition to the reduction measures identified under General Plan 2035 Policy T-A-1, which includes programs designed to reduce the demand for vehicle trips and, consequently, parking, General Plan 2035 policies, including LUL-C-2, LUL-D-2, UD-D-2, LUL-Q-3, LUL-X-5, and H-F-7, would ensure adequate parking for future uses. Impacts would be <b>less than significant</b> .	<u>Consistent.</u> The proposed project would expand the parking facilities on the project site by adding 60 new parking spaces west of the existing parking lot and commercial building to address existing parking shortage for the current use. In addition, General Plan 2035 Policy UD-D-2, would be applicable to the proposed project and would ensure impacts would be <b>less than significant</b> .	None recommended beyond implementation of General Plan 2035 Policy UD-D-2.  <u>UD-D-2:</u> Maintain a uniform setback of structures from the street. Require parking areas to be placed to the side or rear of structures, not in front.
Cumulative Traffic Impacts	<u>Impact 4.C-6:</u> Implementation of the proposed Santa Rosa General Plan 2035 would result in increased motor vehicle traffic, which would contribute to an unacceptable LOS on US-101 and	<u>Consistent.</u> The proposed project is intended to serve the existing use at the project site and is not anticipated to result in a substantial increase in traffic	None recommended beyond implementation of General Plan 2035 Policies T-E-2 and UD-D-2, as outlined above.

Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	SR-12. Implementation of the policy provisions outlined the proposed General Plan 2035 together with improvements to the transportation network when funding becomes available would provide for acceptable operation and capacity on most roadways in the city or acceptable operation and capacity on most segments of US-101 within the city. Therefore, this impact is considered <b>cumulatively considerable and significant and unavoidable.</b>	volumes, delays, or a decrease in LOS on US-101 and SR-12. In addition, General Plan 2035 Policy T-E-2 would be applicable to the proposed project and would ensure impacts would be <b>less than significant.</b>	
<b>D. Air Quality and Climate Change</b>			
Conflict with Applicable Air Quality Plan	<u>Impact 4.D-1:</u> New development under the proposed Santa Rosa General Plan 2035 could increase population and VMT in the area at a rate greater than that assumed in regional air quality planning and therefore conflict with the implementation of the Bay Area Ozone Strategy. General Plan 2035 policies, including LUL-A-1, LUL-A-2, UD-B-2, UD-D-1, UD-E-2, UD-E-3, UD-G-2, H-C-5, H-C6, T-A-1, T-A-2, T-A-6, T-B-1, T-B-4, T-H-1 through T-H-5, T-I-1, T-I-2, T-J-1, T-K-1, T-K-6, T-L-1, T-L-2, T-L-7, PF-A-7, PSF-A-8, PSF-C-2, and OSC-J-2, would reduce VMT through land use planning and alternative modes of transportation. However, the proposed General Plan 2035 would not be consistent with the 2005 Bay Area Ozone Strategy and this impact would therefore remain significant. Notably,	<u>Consistent.</u> The proposed project is intended to serve the existing use at the project site and is not anticipated to result in a substantial increase in VMT, as it would not increase the existing use capacity. In addition, the proposed project would not be subject to the General Plan 2035 policies required to reduce potential VMT impacts. Impacts would be <b>less than significant.</b>	No applicable mitigation measures or General Plan 2035 policies.

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Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	when a jurisdiction develops updated growth forecasts for General Plan revisions that exceed ABAG growth projections, until those forecasts could be incorporated into the next update of the applicable Clean Air Plan, the result is going to be inconsistent with the applicable Clean Air Plan. Impacts would be <b>significant and unavoidable</b> .		
	<u>Impact 4.D-2:</u> The proposed Santa Rosa General Plan 2035 could be inconsistent with the Transportation Control Measures in the 2005 Bay Area Ozone Strategy. However, development under the proposed General Plan 2035 would be subject to policies, including T-A-1, UD-E-2, UD-E-3, UD-G-2, T-A-6, T-J-1, T-K-1, T-K-6, T-L-1, T-L2, T-L-7, PSF-A-8, PSF-C-2, T-A-2, T-B-1, T-B-4, T-H-1, T-C-1, T-C-2, T-C-3, and T-C-4, that are consistent with the TCMs in the Ozone Strategy, and which encourage alternative modes of transportation such as use of transit, bicycling, and walking. They also encourage mixed-use development, a concept that places residential, commercial, industrial, and employment activities close to each other thereby reducing the commute distances of residences in the proposed General Plan 2035. This would reduce adverse impacts associated with motor vehicle use, such as poor air quality, and promote	<u>Consistent.</u> The proposed project is intended to serve the existing use at the project site and is not anticipated to result in increased motor vehicle use, as it would not expand existing use capacity at the site. In addition, the proposed project would not conflict with the TCMs in the Ozone Strategy and would not be subject to the General Plan 2035 policies. Impact would be <b>less than significant</b> .	No applicable mitigation measures or General Plan 2035 policies.

**Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation**

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	use of transit and other modes of travel, such as bicycling and walking. Therefore, the proposed General Plan 2035 is considered to be consistent with the TCMs in the 2005 Bay Area Ozone Strategy and this impact is <b>less than significant</b> .		
Generate Air Pollution in Exceedance of State or Federal Standards	<b>Impact 4.D-3:</b> Construction activities associated with new development included in the proposed Santa Rosa General Plan 2035 could generate air pollution that exceeds state or federal standards. However, implementation of General Plan 2035 Policy OSC-J-1 would reduce air pollutant emissions during construction and ensure this impact would be <b>less than significant</b> .	<b>Consistent.</b> Construction of the proposed project is expected to occur over approximately 6 months and is planned to begin in summer 2024 and continue into the fall of 2024. General Plan 2035 Policy OSC-J-1 would be applicable to the proposed project to reduce air pollutant emissions during construction and ensure <b>less than significant impacts</b> .	None recommended beyond implementation of General Plan 2035 Policy OSC-J-1.  <u>OSC-J-1:</u> Review all new construction projects and require dust abatement actions as contained in the CEQA Handbook of the Bay Area Air Quality Management District.
Expose Sensitive Receptors to Air Toxics or Objectionable Odors	<b>Impact 4.D-4:</b> Implementation of the proposed Santa Rosa General Plan 2035 could expose existing and proposed sensitive receptors to air toxics or objectionable odors. Implementation of policies included in the proposed General Plan 2035, including Policies LUL-K-1, OSC-J-2, and PSC-J-4, would reduce potential DPM exposure and ensure appropriate land use compatibility. The city would also protect existing sensitive land uses from the encroachment of incompatible activities (i.e., traffic) and air pollution to the extent possible during the development permitting process. In addition, implementation	<b>Consistent.</b> The project site is bound by a commercial building and undeveloped land to the north, Corporate Center Parkway to the east, Northpoint Parkway to the south, and vacant/ undeveloped land (ruderal grassland) to the west. Additional vacant/undeveloped land exists east of Corporate Center Parkway and additional commercial uses exist south of Northpoint Parkway. No sensitive receptors are located in the vicinity of the project site. The project would not include any demolition activities, and construction would be typical of	No applicable mitigation measures or General Plan 2035 policies.

Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	of Mitigation Measure 4.D-4 would ensure that sensitive land uses proposed near high volume traffic corridors would have acceptable indoor air quality. With implementation of General Plan 2035 Policies and Mitigation Measure 4.D-4, impact would be <b>less than significant with mitigation incorporated</b> .	parking lot construction activities like grading and paving.  As such, implementation of the proposed project would not expose sensitive receptors to air toxics or objectionable odors and would not be subject to the General Plan 2035 policies. In addition, the proposed project would expand the parking facilities on the project site by adding 60 new parking spaces on the project site and is therefore not considered a sensitive use. Therefore, Mitigation Measure 4.D-4 would not be applicable to the proposed project. Impact would be <b>less than significant</b> .	
Cumulative Air Quality and Climate Change Impact	<u>Impact 4.D-5:</u> The proposed Santa Rosa General Plan 2035 could conflict with implementation of state or local goals for reducing greenhouse gas emissions or generate greenhouse gas emissions (directly or indirectly) that would exceed any applicable threshold of significance and thereby have a negative effect on Global Climate Change. General Plan 2035 policies, including OSC-K-1 through OSC-K-3, OSC-L, and OSC-L-2, would encourage energy conservation and alternative energy sources in projects developments. Depending on the feasibility and level of implementation	<u>Consistent.</u> The proposed project is intended to serve the existing use at the project site and is not anticipated to result in a substantial increase in VMT or increased motor vehicle use. In addition, due to the nature of the proposed project (expanded parking facilities), the proposed project would not be subject to the General Plan 2035 policies to address greenhouse gas emissions or energy use. Impacts would be <b>less than significant</b> .	No applicable mitigation measures or General Plan 2035 policies.



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Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	as applied to individual development projects consistent with the General Plan 2035, the inclusion of additional trip reduction measures (described in Impacts D-1 and D-2) would help to further reduce vehicle-related CO <sub>2</sub> emissions. Future project-specific compliance with BAAQMD permitting would also help to reduce air quality emissions associated with individual projects. However, the increase in greenhouse gases by the proposed General Plan 2035 of 0.2 percent of the state AB 32 reduction goal places the project in conflict with the goal of the state to reduce up to 174 million metric tons CO <sub>2</sub> e/yr. Therefore, as a conservative determination, this impact would remain significant. Implementation of the proposed General Plan 2035 including the adoption of the policies listed above would still result in a <b>significant and unavoidable impact</b> .		
<b>E. Noise</b>			
The proposed project would generate noise associated with construction activities and vehicles during operation. However, project construction noise would be associated with typical parking lot construction activities (e.g., grading and paving) and would not include any vibratory equipment or emergency generators. In addition, the proposed project would not increase operation at the project site and would not increase operational noise. As such, no mitigation measures or General Plan 2035 policies apply to the proposed project and impacts would be <b>less than significant</b> .			
<b>F. Biological Resources</b>			
Degradation of Riparian Habitat or Other Sensitive Natural Communities	<u>Impact 4.F-1</u> : New development permitted under the proposed Santa Rosa General Plan 2035 would impact the habitat quality of streambeds, riparian areas, and other sensitive	<u>Consistent</u> . No riparian or other sensitive communities exist on the project site (impacts to wetlands are discussed under Threshold F-4, below). In addition, the proposed	No applicable mitigation measures or General Plan 2035 policies.

Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	communities, due to increased runoff, siltation, and encroachment (impacts to wetlands are discussed under Impact F-4, below). However, implementation of General Plan 2035 policies, including OSC-A-2, OSC-B-3, OSC-D-1, OSC-D-2, OSC-D-4 through OSC-D-9, OSC-D-11, OSC-D-12, OSC-E-1, and OSC-E-2, would mitigate degradation of creek, riparian, and other sensitive communities. In addition, Citywide Creek Master Plan Policies, including HA-1-1 and HA-1-2, would also mitigate potential degradation of creek, riparian, and other sensitive communities. Implementation of the proposed General Plan 2035 and Citywide Creek Master Plan policies would reduce potential degradation of creek, riparian, and other water-related habitat to <b>less than significant</b> .	project would include on site stormwater features to minimize changes in downstream conditions. Water quality treatment measures such as bio-swales would be incorporated into the site design to filter contaminants prior to discharge. Detention basins would be constructed such that the post-development peak flows are 90 percent of the pre-development peak flows in a 15- and 100-year event, pursuant to City of Santa Rosa standards. Therefore, implementation of the proposed project would not impact the habitat quality of streambeds, riparian areas, and other sensitive communities and the General Plan 2035 policies designed to reduce potential impacts would not be applicable to the proposed project. Impacts would be <b>less than significant</b> .	
Special-Status Species	<u>Impact 4.F-2</u> : New development anticipated under the proposed Santa Rosa General Plan 2035 would impact special-status species, including aquatic species (e.g., steelhead) and vernal pool species (e.g., California tiger salamander, Burke's goldfield, Sonoma sunshine, Sebastopol meadowfoam, and many-flowered navarretia), through reduction or fragmentation of habitat. However,	<u>Consistent</u> . See the Biological Resources section before this table for a discussion of the proposed project's potential impact on special-status species and consistency with the General Plan EIR. As outlined above, due to on-site conservation measures, as outlined in the Santa Rosa Plain Conservation Strategy, project	<b>Mitigation Measure 4.F.5</b> and General Plan 2035 OSC-D-3  <u>OSC-D-3</u> : Preserve and restore the elements of wildlife habitats and corridors throughout the Planning Area.  <b>Mitigation Measure 4.F-5</b> : The City of Santa Rosa shall incorporate the avoidance and mitigation measures described in the Santa Rosa Plain Conservation Strategy and the USFWS

**Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation**

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	implementation of General Plan 2035 policies, including OSC-A-2, OSC-D-1 through OSC-D-4, OSC-E-1, and OSC-E-2, and Citywide Creek Master Plan Policies HA-5-1 and HA-5-2 would reduce potential loss of special-status plants or animals to <b>less than significant</b> .	impacts would be <b>less than significant</b> .	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.
Significant Habitat Areas and Animal Movement Corridors	<u>Impact 4.F-3</u> : Expansion of urban land uses envisioned under the proposed Santa Rosa General Plan 2035 would adversely affect significant habitat areas and wildlife movement corridors. However, implementation of the proposed General Plan 2035 policies outlined for Impact F-2, above (OSC-A-2, OSC-D-1, OSC-D-2, OSC-D-3, OSC-D-4, OSC-E-1, and OSC-E-2) would reduce impacts to habitat areas and wildlife movement corridors to <b>less than significant</b> .	<u>Consistent</u> . See the Biological Resources section before this table for a discussion of the proposed project's potential impact on special-status species and consistency with the General Plan EIR. As outlined above, due to on site conservation measures, as outlined in the Santa Rosa Plain Conservation Strategy, project impacts would be <b>less than significant</b> .	None recommended beyond implementation of General Plan 2035 OSC-D-3 and <b>Mitigation Measure 4.F.5</b> .
Wetlands and Other Aquatic Resource	<u>Impact 4.F-4</u> : Expansion of urban land uses envisioned under the proposed Santa Rosa General Plan 2035 would remove or alter wetlands, marshes, or vernal pools. However, implementation of proposed General Plan 2035 policies, including OSC-D-1, OSC-D-2, OSC-D-4, and OSC-D-5, would mitigate potential loss of vernal pool habitat, and potential impacts to	<u>Consistent</u> . The project site contains three seasonal wetlands, totaling approximately 4,000 square feet (0.09-acre). A wetland delineation covering the project area was field-verified by the USACE on February 15, 2024 (under USACE File No. SPN-2023-00355). <sup>1</sup> General Plan 2035 Policies OSC-D-1, OSC-D-2, and OSC-D-5 would be applicable to the	None recommended beyond implementation of General Plan 2035 Policies OSC-D-1, OSC-D-2, and OSC-D-5.  <u>OSC-D-1</u> : Utilize existing regulations and procedures, including Subdivision Guidelines, Zoning, Design Review, and environmental law, to conserve wetlands and rare plants. Comply with the federal policy of no net loss of wetlands using mitigation measures such as: <ul style="list-style-type: none"> <li>● Avoidance of sensitive habitat,</li> </ul>

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Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	wetlands and other aquatic resources would be <b>less than significant</b> .	proposed project and would reduce potential impacts on the wetlands present on the project site. Consistent with General Plan 2035 policies, the proposed project would avoid all impacts to wetlands and all direct impacts would occur within the non-native grassland habitat. In addition, the proposed project includes the installation of a wetland protection fence along the southern edge and the northwest corner of the proposed parking area. Therefore, impacts would be <b>less than significant</b> .	<ul style="list-style-type: none"> <li>• Clustered development,</li> <li>• Transfer of development rights, and/or</li> <li>• Compensatory mitigation, such as restoration or creation.</li> </ul> <p><u>OSC-D-2:</u> Protect high quality wetlands and vernal pools from development or other activities as determined by the Vernal Pool Ecosystem Preservation Plan.</p> <p><u>OSC-D-5:</u> Consult with North Coast Regional Water Quality Control Board staff as part of the CEQA process for proposed developments to help them identify wetland and vernal pool habitat that has candidacy for restoration/protection based on actual and potential beneficial uses, and determine appropriate locations for mitigation banking.</p>
Conflicts with Local, Regional, or State Habitat Conservation Plans	<u>Impact 4.F-5:</u> Expansion of urban land uses envisioned under the proposed Santa Rosa General Plan 2035 would conflict with local, regional, or State habitat conservation plans. However, implementation of Mitigation Measure 4.F-5, which requires the incorporation of 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 special-status species, including CTS, would reduce impacts to <b>less than significant with mitigation incorporated</b> .	<u>Consistent.</u> The proposed project has the potential to impact upland habitat for CTS and Mitigation Measure 4.F-5 would be required to reduce impacts. As discussed in Biological Resources section below, and required by Mitigation Measure 4.F-5, the proposed project would incorporate all avoidance and mitigation measures related to CTS described in the Santa Rosa Plain Conservation Strategy and the USFWS Programmatic Biological Opinion as conditions of approval for development of the project site. Impacts would be <b>less than</b>	<b>Mitigation Measure 4.F-5.</b>

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Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
		<b>significant with mitigation incorporated.</b>	
Cumulative Biological Resources Impact	<u>Impact 4.F-6:</u> The implementation of the Santa Rosa General Plan 2035 in combination with other reasonably foreseeable projects would result in minimal direct mortality and loss of habitat for special-status species, wetlands, and waters of the United States. In addition, General Plan 2035 policies, including OSC-A-2, OSC-B-3, OSC-D-1, OSC-D-2, OSC-D-4 through OSC-D-9, OSC-D-11, OSC-D-12, OSC-E-1, and OSC-E-2, Citywide Creek Master Plan policies, including HA-1-1 and HA-1-2, and Mitigation Measure 4.F-5, would ensure potential impacts would be less than significant. Therefore, impacts would be <b>less than cumulatively considerable</b> .	<u>Consistent.</u> With implementation of applicable General Plan 2035 Policies, including OSC-D-1, OSC-D-2, and OSC-D-5, and Mitigation Measure 4.F-5, potential impacts related to direct mortality and loss of habitat for special-status species (e.g., CTS) and wetlands associated with the proposed project would be less than significant. Therefore, impacts would be <b>less than significant</b> .	<b>Mitigation Measure 4.F-5</b> and General Plan 2035 Policies OSC-D-1, OSC-D-2, and OSC-D-5.
<b>G. Utilities and Service Systems</b>			
The proposed project is intended to serve the existing commercial use at the project site and would not require new or expanded utility infrastructure or increase demand on utilities. Therefore, implementation of the proposed project would result in <b>less than significant</b> impacts associated with utilities and service systems, consistent with the General Plan EIR.			
<b>H. Hydrology and Water Quality</b>			
Alteration of an Existing Drainage Pattern or Creek	<u>Impact 4.H-1:</u> New development and intensification anticipated under the proposed Santa Rosa General Plan 2035 would alter existing drainage patterns or creeks, causing downstream flooding or erosion. However, implementation of General Plan 2035 policies, including PSF-I, PSF-I-1 through PSF-I-9, OSC-B-3, OSC-D-6, OSC-D-7, NS-D, NS-D-1 through NS-D-6,	<u>Consistent.</u> The proposed project would develop an undeveloped portion of the project site with a new 20,470-square-foot (0.47 acre) parking lot, increasing the amount of impervious surface area at the project site by 20,470 square feet. This increase in impervious surface area would alter the existing drainage pattern of the site and	None recommended beyond implementation of General Plan 2035 Policies PSF-I, PSF-I-1 through PSF-I-3, PSF-I-6, NS-D, NS-D-3, and NS-D-5. Some of the General Plan 2035 policies require action on the part of the City; however, the project would implement Best Management Practices to reduce run off.  <u>PSF-I:</u> Manage, maintain, and improve stormwater drainage and capacity.

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	NS-E, and NS-E-1, would ensure that new development and redevelopment projects included as part of the proposed growth in the General Plan 2035 would limit the amount of runoff that would be directed off-site that might impact downstream receiving waters. Therefore, impacts would be <b>less than significant</b> .	increase stormwater runoff, which could result in downstream flooding or erosion. However, General Plan 2025 Policies PSF-I, PSF-I-1 through PSF-I-3, PSF-I-6, NS-D, NS-D-3, and NS-D-5 would be applicable to the proposed project to address potential project impacts. Consistent with these policies, the proposed project would manage stormwater on-site to minimize changes in downstream conditions. Water quality treatment measures such as bio-swales would be incorporated into the site design to filter contaminants prior to discharge. The water quality treatment measures would include four bioretention basins totaling 1,609 square feet in area to filter contaminants prior to discharge via the 12-inch, 42-foot drainpipe. Detention basins would be constructed such that the post-development peak flows are 90% of the pre-development peak flows in a 15- and 100-year event, pursuant to City of Santa Rosa standards. High frequency storm flows such as 2- and 5-year events will be kept as close to pre-development flows as possible. Therefore, impacts would be <b>less than significant</b> .	<p><u>PSF-I-1</u>: Require dedication, improvement, and maintenance of stormwater flow and retention areas as a condition of approval.</p> <p><u>PSF-I-2</u>: Require developers to cover the costs of drainage facilities needed for surface runoff generated as a result of new development.</p> <p><u>PSF-I-3</u>: Require erosion and sedimentation control measures to maintain an operational drainage system, preserve drainage capacity, and protect water quality.</p> <p><u>PSF-I-6</u>: Require implementation of Best Management Practices to reduce drainage system discharge of non-point source pollutants originating from streets, parking lots, residential areas, businesses, industrial operations, and those open space areas involved with pesticide application.</p> <p><u>NS-D</u>: Minimize hazards associated with storm flooding.</p> <p><u>NS-D-3</u>: Require that new development incorporate features that are consistent with the Standard Urban Storm Water Mitigation Plan (SUSMP) into site drainage plans that would reduce impermeable surface area, increase surface water infiltration, and minimize surface water runoff during storm events. Such features may include:</p> <ul style="list-style-type: none"> <li>• Additional landscape areas;</li> <li>• Parking lots with bio-infiltration systems;</li> <li>• Permeable paving designs; and</li> </ul>

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Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
			<ul style="list-style-type: none"> <li>Stormwater detention basins.</li> </ul> <p><u>NS-D-5:</u> Apply design standards to new development that help reduce project runoff into local creeks, tributaries, and drainage ways.</p>
Water Quality (Nonpoint Source Pollutants in Stormwater Runoff)	<p><u>Impact 4.H-2:</u> New development anticipated under the proposed Santa Rosa General Plan 2035 would degrade water quality by increasing nonpoint source pollutants in stormwater runoff. However, implementation of General Plan 2035 policies, including PSF-I, PSF-I-1 through PSF-I-3, PSF-6, PSF-7, NS-D, NS-D-1, NS-D-3, and NS-D-5, would reduce the total volume and improve the water quality of the runoff would be directed off-site that might impact downstream receiving waters. In addition, all future development projects would be required to comply with the City's Grading and Drainage Ordinance. Therefore, impacts would be <b>less than significant</b>.</p>	<p><u>Consistent.</u> As discussed above under Threshold 4.H-1, General Plan 2025 Policies PSF-I, PSF-I-1 through PSF-I-3, PSF-I-6, NS-D, NS-D-3, and NS-D-5 would be applicable to the proposed project and would address potential water quality impacts associated with stormwater runoff from the project site. In addition, the proposed project would be required to comply with the City's Grading and Drainage Ordinance. Therefore, impacts would be <b>less than significant</b>.</p>	<p>None recommended beyond implementation of General Plan 2035 Policies PSF-I, PSF-I-1 through PSF-I-3, PSF-I-6, NS-D, NS-D-3, and NS-D-5.</p>
Flooding	<p><u>Impact 4.H-3:</u> Urban development anticipated under the proposed Santa Rosa General Plan 2035 would increase drainage flows as a result of impervious surfaces, resulting in localized and cumulative flooding. However, implementation of General Plan 2035 policies, including PSF-I, PSF-I-1 through PSF-I-5, OSC-B-3, OSC-D-6, OSC-D-7, NS-D, and NS-D-3 through NS-D-5, would limit the amount of runoff directed off-site that might</p>	<p><u>Consistent.</u> The proposed project would increase the amount of impervious surface area at the project site by 20,470 square feet, which could result in downstream flooding. However, General Plan 2025 Policies PSF-I, PSF-I-1 through PSF-I-3, NS-D, NS-D-3, and NS-D-5 would be applicable to the proposed project would limit the amount of runoff directed off-site that might impact downstream</p>	<p>None recommended beyond implementation of General Plan 2035 Policies PSF-I, PSF-I-1 through PSF-I-3, NS-D, NS-D-3, and NS-D-5.</p>

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Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	impact downstream receiving waters. Therefore, impacts would be <b>less than significant</b> .	receiving waters. Therefore, impacts would be <b>less than significant</b> .	
Dam Inundation	<u>Impact 4.H-4:</u> Proposed new development anticipated under the proposed Santa Rosa General Plan 2035 would expose people or structures to risk of flooding due to the failure of a dam. However, several General Plan 2035 policies, including NS-C-7, NS-D-6, NS-E, and NS-E-1, would minimizing the risk associated with dams. Therefore, the risk of flooding due to dam failure would be <b>less than significant</b> .	<u>Consistent.</u> The project site is not located within a dam inundation hazard zone. Therefore, implementation of the proposed project would not expose people or structures to risk of flooding due to the failure of a dam and General Plan 2035 Policies NS-C-7, NS-D-6, NS-E, and NS-E-1 would not be applicable and the project would have <b>no impact</b> .	No applicable mitigation measures or General Plan 2035 policies.
Cumulative Hydrology and Water Quality Impact	<u>Impact 4.H-5:</u> Land uses and growth under the proposed Santa Rosa General Plan 2035, in combination with current land uses in the surrounding communities and land use activities and development of the cities and other agencies in the County, could introduce additional non-point source pollutants to surface waters. However, implementation of General Plan 2035 Policies PSF-I, PSF-I-1 through PSF-I-3, PSF-6, PSF-7, NS-D, NS-D-1, NS-D-3, and NS-D-5, would reduce the total volume and improve the water quality of the runoff would be directed off-site that might impact downstream receiving waters. In addition, all future development projects would be required to comply with the City's Grading and Drainage	<u>Consistent.</u> As discussed above under Threshold 4.H-1, General Plan 2035 Policies PSF-I, PSF-I-1 through PSF-I-3, PSF-I-6, NS-D, NS-D-3, and NS-D-5 would be applicable to the proposed project and would address potential water quality impacts associated with stormwater runoff from the project site. In addition, the proposed project would be required to comply with the City's Grading and Drainage Ordinance. Therefore, impacts would be <b>less than significant</b> .	None recommended beyond implementation of General Plan 2035 Policies PSF-I, PSF-I-1 through PSF-I-3, PSF-I-6, NS-D, NS-D-3, and NS-D-5.



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Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	Ordinance. Therefore, this impact is mitigated through the use of effective BMPs that include site preparation, runoff control, sediment retention, and other similar features. Therefore, impacts would be <b>less than cumulatively considerable</b> .		
	<u>Impact 4.H-6:</u> Implementation of the proposed Santa Rosa General Plan 2035 along with potential development in the surrounding region would increase impervious surfaces and alter drainage conditions and rates in the Planning Area, which would contribute to cumulative flood conditions in creeks in the Planning Area. However, implementation of General Plan 2035 policies, including PSF-I, PSF-I-1 through PSF-I-9, OSC-B-3, OSC-D-6, OSC-D-7, NS-D, NS-D-1 through NS-D-6, NS-E, and NS-E-1, would ensure that new development and redevelopment projects included as part of the proposed growth in the General Plan 2035 would limit the amount of runoff that would be directed off-site that might impact downstream receiving waters. Therefore, impacts would be <b>less than cumulatively considerable</b> .	<u>Consistent.</u> As discussed above under Threshold 4.H-1, General Plan 2035 Policies PSF-I, PSF-I-1 through PSF-I-3, PSF-I-6, NS-D, NS-D-3, and NS-D-5 would be applicable to the proposed project to address potential project impacts associated with the alteration of drainage patterns. Therefore, impacts would be <b>less than significant</b> .	None recommended beyond implementation of General Plan 2035 Policies PSF-I, PSF-I-1 through PSF-I-3, PSF-I-6, NS-D, NS-D-3, and NS-D-5.
<b>I. Public Services</b>			
The proposed project is intended to serve the existing commercial use at the project site and would not increase demand on public services. Therefore, implementation of the proposed project would result in <b>less than significant</b> impacts associated with public services, consistent with the General Plan EIR.			

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<b>J. Cultural Resources</b>			
Archaeological Resources	<u>Impact 4.J-1:</u> Implementation of the proposed Santa Rosa General Plan 2035 would generally help protect Santa Rosa's Native American archaeological resources. However, revisions to proposed General Plan 2035 policies would ensure protection of historic-era archaeological resources and to Native American human remains. General Plan 2035 Policies HP-A-1 through HP-A-5 would reduce potential impacts on archaeological resources, including human remains, and impacts would be <b>less than significant</b> .	<u>Consistent.</u> Construction of the proposed project has the potential to impact previously undiscovered archaeological resources, including human remains. However, General Plan 2035 Policies HP-A-1 through HP-A-5 would be applicable to the proposed project and would reduce potential impacts on archaeological resources. Consistent with Policy HP-A-1, a cultural records search was conducted on July 2, 2024. With implementation of policies HP-A-3 and HP-A-5, the project would have a <b>less than significant</b> impact.	None recommended beyond implementation of General Plan 2035 policies
Historic Resources	<u>Impact 4.J-2:</u> Implementation of the proposed Santa Rosa General Plan 2035 would help preserve Santa Rosa's historic structures and neighborhoods and would help to increase public involvement in the historic preservation process. General Plan 2035 Policies HP-B-1, HP-B-2, HP-B-4, HP-B-7 would reduce potential impacts on historical resources, impacts would be <b>less than significant</b> .	<u>Consistent.</u> No historical resources are present on the project site. Therefore, implementation of the proposed project would not impact any historical resources and General Plan 2035 Policies HP-B-1, HP-B-2, HP-B-4, HP-B-7 would not be applicable, and the project would have <b>no impact</b> .	No applicable mitigation measures or General Plan 2035 policies.
Cumulative Cultural Resources Impact	<u>Impact 4.J-3:</u> Implementation of the proposed Santa Rosa General Plan 2035 along with potential development in the surrounding region would result in cumulative impacts to cultural resources in the region. General Plan 2035 Policies HP-A-1	<u>Consistent.</u> Construction of the proposed project has the potential to impact previously undiscovered archaeological resources, including human remains. However, General Plan 2035 Policies HP-A-3 and HP-A-5 would be applicable to the	None recommended beyond implementation of General Plan 2035 Policies HP-A-3 and HP-A-5.  <u>HP-A-3:</u> If cultural resources are encountered during development, work should be halted to avoid altering the materials and their context until a qualified consulting archaeologist and Native

Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	through HP-A-5 would reduce potential cumulative impacts on cultural resources (i.e., prehistoric sites, historic sites, and isolated artifacts and features) and human remains to less than significant. Therefore, impacts would be <b>less than cumulatively considerable</b> .	proposed project and would reduce potential impacts on archaeological resources. Therefore, impacts would be <b>less than significant</b> .	American representative (if appropriate) has evaluated the situation, recorded the identified cultural resources, and determined suitable mitigation measures.  <u>HP-A-5</u> . Ensure that Native American human remains are treated with sensitivity and dignity and assure compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.
	<u>Impact 4.J-4</u> : Implementation of the proposed Santa Rosa General Plan 2035 along with potential development in the surrounding region would result in cumulative impacts to paleontological resources in the region. However, implementation of the provisions outlined in the proposed General Plan 2035 would reduce the contribution to cumulative impacts to paleontological resources to less than significant. Therefore, impacts would be <b>less than cumulatively considerable</b> .	<u>Consistent</u> . Construction of the proposed project has the potential to impact previously undiscovered paleontological resources. However, implementation of the provisions outlined in the General Plan 2035 would reduce the contribution to cumulative impacts to paleontological resources to less than significant. Therefore, impacts would be <b>less than significant</b> .	No applicable mitigation measures or General Plan 2035 policies.
<b>K. Visual Quality</b>			
The proposed project would result in a new at-grade parking lot on the project site, which would not affect views of the project site from the surrounding area. General Plan 2035 Policies UD-A-10 and UD-F-4 would be applicable to the proposed project and would ensure impacts associated with visual quality would be <b>less than significant</b> , consistent with the General Plan EIR.			
<u>UD-A-10</u> : Relate landscape design to the natural setting. Require that graded areas within new development be revegetated.			
<u>UD-F-4</u> : Provide visual interest in building, site, and landscape design that avoids the sense of a monotonous tract development.			
<b>L. Open Space and Agriculture</b>			

**Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation**

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
The proposed project would not convert designated open space or agricultural areas or result in loss of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, implementation of the proposed project would result in <b>less than significant</b> impacts associated with open space and agriculture, consistent with the General Plan EIR.			
<b>M. Geology, Soils, and Seismicity</b>			
According to the City's General Plan 2035, the project site is not located within a mapped Earthquake Fault Zone, an area of violent or very violent ground shaking from an earthquake on the Rodgers Creek Fault (the nearest active fault), an area of unstable rock on slopes greater than 15 percent, or a landslide complex. In addition, the proposed project would not include any new habitable structures on the project site. General Plan 2035 Policy NS-C-8 would ensure less than significant impacts associated with soil erosion and loss of topsoil during construction. The proposed project would also be required to comply with the Uniform Building Code and CBC. Therefore, implementation of the proposed project would result in <b>less than significant</b> impacts associated with geology, soils, and seismicity, consistent with the General Plan EIR.			
<u>NS-C-8:</u> Adopt mandatory, minimum erosion control measures for current properties and those under construction that exhibit high erosion potential, are in areas of steep slopes, or have experienced past erosion problems. Control measures shall reduce soil erosion from primary erosional agents, including wind, construction operations, and storm water runoff.			
<b>N. Hazards and Hazardous Materials</b>			
Exposure and Release of Hazardous Materials	<u>Impact 4.N-1:</u> Development anticipated under the proposed Santa Rosa General Plan 2035 on land previously impacted by releases of hazardous materials such as from underground fuel storage tanks would expose residents or workers to hazardous materials or wastes. However, implementation of General Plan 2035 Policies NS-F and NS-F-1 through NS-F-6 would minimize dangers from exposure to hazardous materials. Impacts would be <b>less than significant</b> .	<u>Consistent.</u> The project site is not known to contain any hazardous materials or wastes (such as underground fuel storage tanks) and is not located on a list of hazardous materials sites. Therefore, the risk of exposure or release of hazardous materials would be <b>less than significant</b> and General Plan 2035 Policies NS-F and NS-F-1 through NS-F-6 would not be applicable to the proposed project.	No applicable mitigation measures or General Plan 2035 policies.
Hazardous Building Materials	<u>Impact 4.N-2:</u> Demolition of any existing structures for the purpose of redevelopment anticipated under the proposed Santa Rosa General Plan 2035 could contain hazardous building materials, such as lead-based paint,	<u>Consistent.</u> The proposed project does not include demolition activities. Therefore, General Plan 2035 Policies NS-F-1, NS-F-2, and NS-F-5 would not be applicable to	No applicable mitigation measures or General Plan 2035 policies.

Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	asbestos containing materials (ACMs), and polychlorinated biphenyls (PCBs) which could expose and adversely affect workers, the public, or the environment if not handled appropriately. However, implementation of General Plan 2035 Policies NS-F-1, NS-F-2, and NS-F-5 would require that remediation and cleanups as well as all other aspects of new businesses adhere to all applicable regulations such as those described above in addition to the Hazardous Materials and Waste Management Plan of Sonoma County. Therefore, proposed redevelopment of older existing facilities would be required to adhere to appropriate identification and abatement procedures by certified contractors who employ practices that limit the exposure of hazardous building materials, where present, and impacts would be <b>less than significant</b> .	the proposed project and impacts would be <b>less than significant</b> .	
Transportation, Use, and Storage of Hazardous Chemicals	<u>Impact 4.N-3</u> : New commercial and light industrial uses anticipated under the proposed Santa Rosa General Plan 2035 would involve the transportation, use, and storage of hazardous chemicals, which could present public health and/or safety risks to facility workers, patients and visitors, and the surrounding area. However, implementation of General Plan 2035 Policies NS-F-3 through NS-F-6 would	<u>Consistent</u> . Construction of the proposed project has the potential to create a hazard to the public or environment through the routine transportation, use, and disposal of construction-related hazardous materials such as fuels, soils, solvents, and other materials. Operation of the proposed project is not expected to use any hazardous materials. General Plan	None recommended beyond implementation of General Plan 2035 policy NS-F-5.  <u>NS-F-5</u> : Require commercial and industrial compliance with the Sonoma County Hazardous Materials and Waste Management Plan.

**Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation**

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
	require that hazardous materials are stored, handled, and disposed of according to the Hazardous Materials and Waste Management Plan of Sonoma County and restrictions on facilities handling large quantities of hazardous materials would be placed. With implementation of General Plan 2035 policies, impacts would be <b>less than significant</b> .	2035 Policy NS-F-5 would be applicable to the proposed project to ensure compliance with the Hazardous Materials and Waste Management Plan of Sonoma County and compliance with all applicable federal, State, and local regulations would ensure the proposed project would have a <b>less than significant</b> impact to the public or environment from the routine transportation, use, and disposal of hazardous materials during construction.	
Cumulative Hazards and Hazardous Materials Impact	<u>Impact 4.N-4:</u> Land use and infill development envisioned under the proposed Santa Rosa General Plan 2035 would not result in cumulative hazardous materials and human health risk impacts with implementation of the General Plan 2035 policies discussed above. Impacts would be <b>less than cumulatively considerable</b> .	<u>Consistent.</u> With implementation of General Plan 2035 Policy NS-F-5, implementation of the proposed project would not result in a significant impact related to hazards or hazardous materials. Therefore, impacts would be <b>less than significant</b> .	None recommended beyond implementation of General Plan 2035 Policy NS-F-5.
<b>O. Energy</b>			
The proposed project is intended to serve the existing use at the project site and would not increase the need for, or cause, inefficient use of, local energy sources. Therefore, implementation of the proposed project would result in <b>less than significant</b> impacts associated with energy, consistent with the General Plan EIR.			
<b>P. Parks and Recreation</b>			
The proposed project is intended to serve the existing use at the project site and would not increase demand on parks and recreation facilities. Therefore, implementation of the proposed project would result in <b>less than significant</b> impacts associated with parks and recreation, consistent with the General Plan EIR.			

<sup>1</sup> Department of the Army, San Francisco District, United States Army Corps of Engineers. 2024. File No. SPN-2023-00355. February 15.

AB = Assembly Bill

ABAG = Association of Bay Area Governments

BAAQMD = Bay Area Air Quality Management District

CO<sub>2</sub> = carbon dioxide

CO<sub>2</sub>e/yr = carbon dioxide equivalents per year

CTS = California tiger salamander

LOS = level of service

SR-12 = State Route 12

TCM = Transportation Control Measure

US-101 = United States Highway 101

USACE = United States Army Corps of Engineers

USFWS = United States Fish and Wildlife Service

**Table B: EIR Impact Analysis Summary for Impacts Requiring Mitigation**

Resource Topic	Summary of General Plan EIR Impacts	Applicable Potential Project Impacts	Applicable General Plan EIR Mitigation Measures and General Plan Policies
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DPM = diesel particulate matter  
EIR = Environmental Impact Report

VMT = vehicle miles traveled

## CONSISTENCY ANALYSIS PURSUANT TO CEQA GUIDELINES SECTION 15183 (PROJECTS CONSISTENT WITH A COMMUNITY PLAN, GENERAL PLAN, OR ZONING)

As demonstrated in the EIR Impact Analysis Summary provided above, the proposed project was determined to be consistent with the findings of the certified General Plan EIR. The proposed project is therefore exempt from further environmental review on the basis that all proposed project elements are consistent with the environmental impacts, environmental effects, and zoning requirements outlined in the General Plan EIR. Further analysis is included below.

**A. The project entitlements would be consistent with the land uses, densities, and other zoning and development standards set forth in the General Plan 2035, and which were analyzed in the General Plan EIR.**

The proposed project would be located at 1455 Corporate Center Parkway in the City of Santa Rosa, Sonoma County. The project site is designed as General Industry in the City's General Plan 2035 and is within the IG zoning district. The proposed project would expand the parking facilities on the project site by adding 60 new parking spaces on 20,470 square feet (0.47 acre) of the project site in order to serve the existing commercial uses at the project site. As such, the proposed project would be consistent with the land uses densities, and other zoning and development standards set forth in the General Plan 2035.

**B. "Environmental effects that are peculiar to the project or the parcel on which the project would be located" Standard.**

Pursuant to *State CEQA Guidelines* Section 15183(b)(1), this section presents an examination and discussion of whether the proposed project could result in environmental effects that are peculiar to the project or the project site. If no additional mitigation measures are required to reduce project-specific impacts to a less than significant level, other than those required in the prior EIR, then *State CEQA Guidelines* Section 15183 exemption applies.

The proposed project would not result in any environmental effects that would be peculiar to the project or the project site. Based on the EIR Impact Analysis Summary (see Table A above), the proposed project would not result in any new impacts that would require additional mitigation measures, beyond those required under the General Plan EIR. Accordingly, no impacts peculiar to the proposed project or project site would occur.

**C. "Environmental effects that were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent" Standard.**

Pursuant to *State CEQA Guidelines* Section 15183(b)(2), this section presents an examination and discussion of whether there are any environmental effects that were not analyzed as significant effects in the General Plan EIR (e.g., General Plan amendments, zoning actions, etc.) with which the proposed project would be consistent.

The EIR Impact Analysis Summary includes a summary of the impact conclusions of the General Plan EIR compared to the potential impacts associated with the proposed project. As discussed



in the EIR Impact Analysis Summary (see Table A above), no significant and unavoidable impacts were identified in the General Plan EIR, and no new significant impacts would occur with implementation of the proposed project.

**D. “Environmental effects that are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action” Standard**

Pursuant to *State CEQA Guidelines* Section 15183(b)(3), this section presents a discussion of and analyzes whether there are any environmental effects that are potentially significant off-site impacts and cumulative impacts which were not discussed in the General Plan EIR.

The proposed project would not increase significant off-site or cumulative impacts and would not contribute significantly to public utility demand, traffic, and air quality given that there are no long-term or operational services required. In addition, the appropriate General Plan 2035 policies and mitigation measures discussed in the EIR Impact Analysis Summary would be implemented during construction of the proposed project, and the proposed project would not result in more severe impacts for any environmental resource category than those analyzed in the General Plan EIR.

**E. “Environmental effects that are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.” Standard**

Pursuant to *State CEQA Guidelines* Section 15183(b)(4), this section presents a discussion of and analyzes whether there are any environmental effects that are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

The General Plan EIR was certified in November 2009. No other updated planning documents, including ordinances, provided substantial new information which was not known at the time the EIR was certified. Since no substantial new information not known at the time of the General Plan EIR is available, no updated analyses or other studies are required for the project site.

**State CEQA Guidelines Section 15162 (Subsequent or Supplemental EIR)**

Alternatively, and as also demonstrated in the EIR Impact Analysis Summary, no new information of substantial importance meeting the criteria listed in *State CEQA Guidelines* Section 15162 has been identified.

The discussion in this section confirms that the proposed project has been evaluated for significant impacts pursuant to CEQA, and no new information of substantial importance meeting the criteria listed in *State CEQA Guidelines* Section 15162 has been identified. Under *State CEQA Guidelines* Section 15162, the determination is that the project’s impacts have been considered in the General

Plan EIR that was reviewed and certified by the City Council, and that the EIR provides a sufficient and adequate analysis of the environmental impacts of the proposed project.

**A. “Substantial Changes in the Project” Standard**

Pursuant to *State CEQA Guidelines* Section 15162(a)(1), this section presents a discussion of whether the proposed project constitutes a substantial change in the project analyzed in the General Plan EIR that would require major revisions to the General Plan EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The proposed project would be consistent with the existing zoning and planning in the General Plan EIR. Therefore, the proposed project would not require major revisions to the General Plan EIR.

**B. “Substantial Changes in the Circumstances” Standard**

Pursuant to *State CEQA Guidelines* Section 15162(a)(2), this section presents a discussion of whether changes to the project site or the vicinity (environmental setting) have occurred after certification of the General Plan EIR that would result in new significant impacts or a substantial increase in the severity of a previously identified significant impact that were not evaluated and mitigated by the General Plan EIR.

The project site occupies lands historically graded for runways and drainage on the former Naval Auxiliary Landing Field Santa Rosa. The project site comprises open ruderal grassland, small seasonal wetlands, and several storm water drainage structures (drain inlets) and is currently developed with a commercial building that houses the nonprofit organization Becoming Independent, associated surface parking, and a landscaped garden area.

The project site is in similar condition as originally analyzed in the General Plan EIR. Thus, the proposed project would not result in new significant impacts or a substantial increase in the severity of a previously identified significant impact from what was included in the General Plan EIR that would affect any issue of environmental significance.

One of the requirements of CEQA is the examination of whether a proposed project would conflict with existing plans and regulations, including the General Plan, zoning regulations, and other planning documents. Inconsistencies may suggest that a project would have environmental effects that were not identified in advance, and for which planning or analysis has not occurred. As discussed above, the proposed project would be consistent with the General Plan 2035 land use and zoning designations for the project site.

Based on the above, the proposed project would not result in any new circumstances that would result in new significant impacts or substantially more severe impacts from what has been anticipated for the site in the General Plan EIR.

### C. “New Information of Substantial Importance” Standard

Pursuant to *State CEQA Guidelines* Section 15162(a)(3), this section includes a discussion of whether the proposed project would result in new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified. New information of substantial importance includes: (1) one or more significant effects not discussed in the previous EIR; (2) significant effects previously examined that are substantially more severe than shown in the previous EIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (4) mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The proposed project would not result in significant effects not discussed in the General Plan EIR or increase the severity of impacts identified in the General Plan EIR. In addition, no other mitigation measures or alternatives would be applicable or feasible for the proposed project. Therefore, the proposed project would not result in new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified.

Attachments: A: References  
B: Figure 1

## ATTACHMENT A

### REFERENCES

California Department of Fish and Wildlife (CDFW). 2022. California Natural Diversity Database, commercial version dated April 30, 2022. Biogeographic Data Branch, Sacramento.

City of Santa Rosa. 2009. *Draft Santa Rosa General Plan 2035 Environmental Impact Report*. March.

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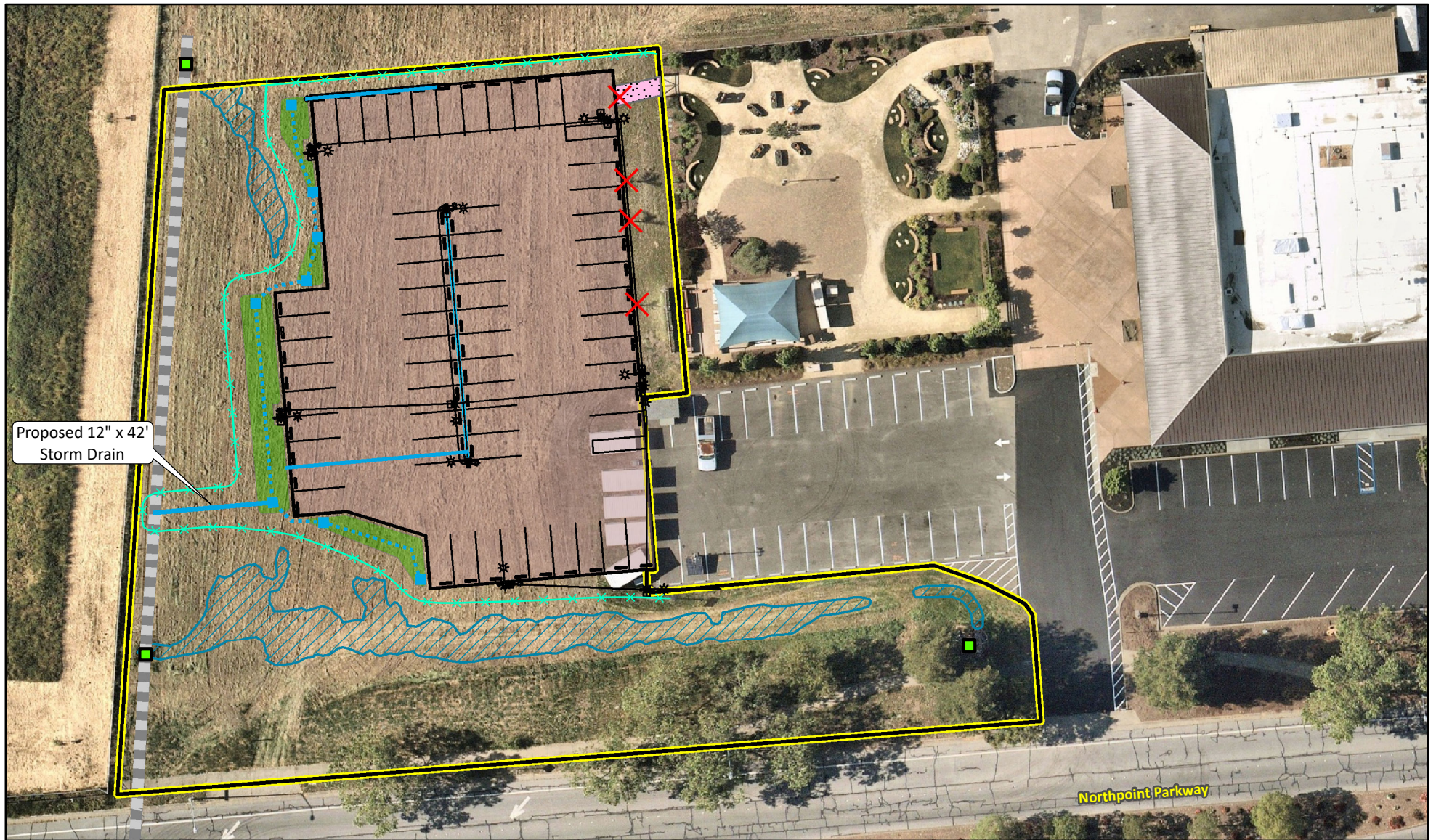
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## ATTACHMENT B

### FIGURE 1





LSA



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FEET

SOURCE: Nearmap (05/2022).

I:\2023\20230971\GIS\MXD\ITP\Figure 3\_Proposed Project.mxd (7/17/2024)

#### LEGEND

- Project Site (1.26 acres)
- Existing Seasonal Wetlands
- Existing Storm Water Drain Inlet
- Existing 72-inch Storm Sewer

#### Proposed Project

- Impervious Surface (0.47 ac)
- Bioretention Basin (0.04 ac)
- Decomposed Gravel Sidewalk (<0.01 ac)
- Proposed Storm Drain Network

- ~ Wildlife Exclusion Fence (Temporary during construction)
- X Tree to be Removed

FIGURE 1

*Becoming Independent*  
Santa Rosa, Sonoma County, California  
Proposed Project