Environmental Assessment
Determination of Compliance for HUD-assisted Projects
24 CFR Part 58

Project Information

Project Name: Sage Commons Project

Responsible Entity: City of Santa Rosa

Grant Recipient (if different than Responsible Entity): Not Applicable

State/Local Identifier:

Preparer: SHN on behalf of City of Santa Rosa

Certifying Officer Name and Title: Clare Hartman, Deputy Director of Planning and Economic Development, City of Santa Rosa

Consultant (if applicable): SHN, 1062 G Street, Suite I, Arcata, CA 95521, (707) 822-5785

Direct Comments to: Megan Basinger, Housing and Community Services Manager, City of Santa Rosa Housing and Community Services Department, 90 Santa Rosa Avenue, Santa Rosa, CA 95404, mbasinger@srcity.org.
Project Location: The Sage Commons Project is located at 80 College Avenue, in Santa Rosa, California (see Figure 1 – Project Region and Figure 2 – Project Area).

Project Site: The site is approximately 0.98-acres (42,689 square feet) and consists of one parcel that recently underwent a merger to combine three parcels (APNs 010-121-020, -024, -025). The new parcel number has not yet been assigned by the Sonoma County Assessor’s Office. The project site is located within the Downtown Station Area Specific Plan (DSASP) boundary and is currently zoned Commercial General (CG) Station Area (SA) (see Attachment 22). Vehicular access to the project site currently occurs from College Avenue. The project site is at an elevation of approximately 148 feet and topography on the site is relatively flat (<1%).

Santa Rosa CityBus provides fixed route service in the project area and the nearest bus stop is located across the street from the project site on the southeast corner of the College Avenue/Cleveland Avenue intersection (see Attachment 39, pg. 3). The project site is located approximately one mile from two Sonoma- Marin Area Rail Transit (SMART) stations (i.e., Santa Rosa Downtown and North Santa Rosa) and is served by SMART, Mendocino Transit, and Amtrak (see Attachment 39, pg. 4).

Historically, the project site contained several houses and commercial uses including a furniture warehouse, grocery store, and several restaurants. The buildings most recently located on the project site were demolished prior to March 2019 (see Attachment 29, pgs. 19-20).

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]: Danco Communities, the applicant, proposes a three-story building with 54 residential units and supportive services. The residential units would include 53 very low-income studio units for formerly homeless tenants as part of a permanent supportive housing program and 1 manager’s unit. The Housing Authority of the City of Santa Rosa will administer housing assistance to the project in the form of Project Based Vouchers for 8 units.

In addition to the residential units, there will be a lobby, offices, meeting and therapy rooms for an on-site service provider, onsite security, common laundry rooms, gyms, and lounges. Site development includes replacement of sidewalks and a new access driveway with parking for 10 cars, covered bike shelter for 56 bicycles, trash and recycling enclosure, and a south-facing courtyard that will include gardening beds, landscaping, and stormwater detention. The building will be 100 percent accessible (“universal design”) and will include one elevator (see Figure 4 - Architectural Plans).

Project construction will take approximately 18 months and is expected to begin Summer 2020 and be completed by Fall 2021. The applicant estimates the total cost of the Sage Commons Project to be $22,282,209.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]: The U.S. Department of Housing and Urban Development (HUD) defines chronic homelessness as an unaccompanied individual with a disabling condition who has been continuously homeless for one year or more or has experienced four or more episodes of homelessness within the past three years. Throughout the country, homelessness has become a major concern. Factors
contributing to the increase in homeless persons and families and those in need of shelter and transitional housing include:

- The lack of housing affordable to very low- and low-income persons;
- Increases in unemployment or under-employment;
- Reductions in government subsidies;
- Deinstitutionalization of the mentally ill;
- Domestic violence;
- Drug addiction; and
- Dysfunctional families.

The very nature of homelessness makes it difficult to count persons with no permanent shelter. The Sonoma County Continuum of Care Planning Group oversees the county’s assessment of homeless persons and conducts point-in-time homeless counts as required by HUD. The 2019 point-in-time count found 2,951 homeless persons in Sonoma County as a whole, with 1,661 homeless persons in the corporate limits of the City of Santa Rosa (see Attachment 32, pg. 15).

In 2016, the City prepared a Housing Action Plan to address the City’s unmet housing needs and to implement the City’s General Plan Housing Element. The Plan provides the estimate of Santa Rosa’s new housing needs through the current Housing Element Cycle (2014-2023), which includes an additional 473 extremely low-income, 474 very low-income units, and 581 low-income units. The Plan indicates that actual housing needs may exceed these numbers as there is currently a deficit, exemplified by the very low housing vacancy rates in the City (see Attachment 17, pgs. 3-4). The Sage Commons Project would be consistent with the following objectives in the City’s Housing Action Plan:

Objective 1: Build 5,000 housing units in the current Housing Element Cycle (through 2023) consistent with General Plan Housing Element Quantified Objectives (RHNA).

Objective 2: Achieve construction of 2,500 affordable housing units, including 30 percent of the total (approximately 1,500 units) for lower income households, and 20 percent of the total (approximately 1,000 units) for moderate income households created through a strategic approach that includes achieving inclusionary housing within for sale market-rate housing projects, innovative “affordability by design” market-rate affordable housing, providing regulatory incentives and financial subsidies for affordable housing projects, and continued collaboration with affordable housing developers.

Existing Conditions and Trends [24 CFR 58.40(a)]:
The project site (80 College Avenue) is located in Santa Rosa, California. The property is approximately 0.98 acres and is currently vacant (see Figure 3 - Photos of Project site). The project site recently underwent a merger to combine three parcels (APNs 010-121-020, -024, -025) and the new parcel number has not yet been assigned by the Sonoma County Assessor’s Office. Vehicular access to the project site currently occurs from College Avenue. Uses of the area surrounding the project site consists of the following (see Figure 2 - Project Area):
North: To the north of the project site is College Avenue, commercial uses (e.g., Northbay Motorsport and Aztech Logistics & Distribution), and residential uses.

South: To the south is commercial uses (e.g., 101 Express Smog, King’s Appliances, Davis Automotive, etc.), the SMART rail line and multi-use pathway, and the Bodean Asphalt Plant.

East: To the east is Cleveland Avenue, Santa Rosa Hydramatic Service, residential uses, and U.S. 101.

West: To the west is the SMART rail line and multi-use pathway, Suburban Propane, and the Bodean Asphalt Plant.

The project site is zoned General Commercial (CG) with the Station Area (SA) combining district overlay and is located within the boundaries of the DSASP (see Attachment 22). The Specific Plan encourages a vibrant urban center, including a distinct identity and character, a diverse mix of uses, transient-oriented development, and pedestrian-friendly connections (see Attachment 13, pg. 3-1). In 2007, the City of Santa Rosa certified an Environmental Impact Report (EIR) for the Specific Plan (SCH# 2006072104). The City has determined that the density, design, and infrastructure plan proposed by the project is consistent with the adopted Specific Plan (see Attachment 19).

According to the U.S. Census, Santa Rosa experienced a 1.4 percent increase in population between 2010 and 2018. Sonoma County experienced a 2.2 percent increase in population during this same time period (see Attachment 33). The California Department of Finance reports a 0.9 percent decrease in population from 2019 to 2020 in the City of Santa Rosa. Sonoma County was reported to have a 0.8 percent decrease in population from 2019 to 2020 (see Attachment 7).

Funding Information

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Funding Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>N/A</td>
<td>Section 8 PBV – 8 vouchers</td>
<td>$137,472*</td>
</tr>
</tbody>
</table>

*This is the annual amount which would occur over a 20-year contract period

Estimated Total HUD Funded Amount: $2,749,440

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction Costs:</td>
<td>$12,855,153</td>
</tr>
<tr>
<td>Non-Construction Costs:</td>
<td>$9,558,988</td>
</tr>
<tr>
<td>Total:</td>
<td>$22,414,141</td>
</tr>
</tbody>
</table>
**Project Figures**

Figure 1 - Project Region

Figure 2 - Project Area

Figure 3 - Photos of Project site

Figure 4 - Architectural Plans

Figure 5 - Area of Potential Effect Map

Figure 6 - CDFW CNDDDB Map

Figure 7 - Airport Safety-Clear Zones Map

Figure 8 - FEMA Firm Map

Figure 9 - USFWS National Wetlands Inventory Map

**Project Tables**

Table 1 – BAAQMD Construction and Operational-Related Screening Level Sizes

Table 2 – BAAQMD Receptor Thresholds vs. Cumulative Totals for Risks and Hazards

Table 3 – Project Trip Generation Estimates
Figure 3 - Photos of Project Site

Viewpoint A - Project Site-West Side Looking Southeast from College Ave

Viewpoint B - Project Site-Center Looking South from College Avenue
Figure 3 - Photos of Project Site

Viewpoint C - Project Site-East Side Looking South from College Avenue

Viewpoint D: Project Site-East Side Looking West from Cleveland Avenue
Figure 4 - Architectural Plans
Figure 4 - Architectural Plans
Figure 4 - Architectural Plans
Figure 4 - Architectural Plans
Figure 4 - Architectural Plans
NOTE:

THE NWI WETLAND MAPPER BY THE U.S. FISH & WILDLIFE SERVICE DOES NOT SHOW ANY WETLANDS OR RELATED FEATURES ON OR WITHIN THE VICINITY OF THE PROJECT AREA.

(WWW.FWS.GOV/WETLANDS/DATA/MAPPER.HTML)
Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Airport Hazards</strong></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>24 CFR Part 51 Subpart D</td>
<td>☑</td>
<td></td>
</tr>
<tr>
<td><strong>Coastal Barrier Resources</strong></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</td>
<td>☑</td>
<td></td>
</tr>
<tr>
<td><strong>Flood Insurance</strong></td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>---------------------</td>
<td>-----</td>
<td>----</td>
</tr>
<tr>
<td>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 (42 USC 4001-4128 and 42 USC 5154a)</td>
<td>☐</td>
<td>☒</td>
</tr>
</tbody>
</table>

Based on the 2008 (Panel 06097CO728E, eff. 12/2/2008) Flood Insurance Rate Map, the site is located in Zone X (see Figure 8 – FEMA Firm Map). The Zone X designation is defined as an Area of Minimal Flood Hazard. As such, the project area is not located in a FEMA designated Special Flood Hazard Area. As such, Flood Insurance is not required for the project.

*Documentation can be found on the City’s website at the following address: [https://srcity.org/804/Document-Library](https://srcity.org/804/Document-Library)*

<table>
<thead>
<tr>
<th><strong>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</strong></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Clean Air</strong></td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

The project site is located in southern Sonoma County which is within the San Francisco Bay Area Air Basin and under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD).

The BAAQMD is the primary agency responsible for assuring that the National and California Ambient Air Quality Standards (NAAQS and CAAQS, respectively) are attained and maintained in the Bay Area. The BAAQMD’s jurisdiction includes all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo and Santa Clara counties, and the southern portions of Solano and Sonoma counties. The Air District’s responsibilities in improving air quality in the region include: preparing plans for attaining and maintaining air quality standards; adopting and enforcing rules and regulations; issuing permits for stationary sources of air pollutants; inspecting stationary sources and responding to citizen complaints; monitoring air quality and meteorological conditions; awarding grants to reduce mobile emissions; implementing public outreach campaigns; and assisting local governments in addressing climate change. (see Attachment 3, pg. 1-1).

Sonoma County is currently listed as being “nonattainment” for the federal and state
ambient air quality standards for Ozone ($O_3$). Sonoma county is listed as being “non-attainment” for California State ambient air quality standards and “unclassified/attainment” for federal ambient air quality standards for fine particulate matter ($PM_{2.5}$). The County is also “nonattainment” for the state ambient air quality standard for particulate matter ($PM_{10}$) (see Attachment 4).

Impacts from the Project

The BAAQMD developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant air quality impacts. If a project meets all of the screening criteria, then a detailed air quality assessment of the project’s air pollutant emissions would not be required (Attachment 3, pg. 3-1).

The applicant proposes a three-story apartment building, which would be classified as a “Mid-rise Apartment” in the BAAQMD CEQA Guidelines. Table 1 below contains the construction and operational-related screening levels sizes for that classification.

Table 1 – BAAQMD Construction and Operational-Related Screening Level Sizes

<table>
<thead>
<tr>
<th>Land Use Type</th>
<th>Construction Screening Size</th>
<th>Operational Screening Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mid-Rise Apartment</td>
<td>240 du</td>
<td>494 du</td>
</tr>
</tbody>
</table>

Notes:
- du = dwelling unit

Since the project is a multi-family housing development with fifty-four (54) dwelling units, it would fall below the screening criteria developed by the BAAQMD for
Construction and operational emissions. As such, a detailed air quality assessment would not be required for the proposed project. Since the project is below the BAAQMD screening criteria for a “Mid-rise Apartment”, the project would not result in the generation of criteria air pollutants and/or precursors that exceed the thresholds of significance developed by the BAAQMD (see Attachment 3, pg. 3-1).

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of particulate matter (e.g., PM$_{10}$). These fugitive dust emissions have the potential to impact nearby sensitive receptors (e.g., residents). Fugitive dust emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. Fugitive dust emissions would also depend on soil moisture, silt content of soil, wind speed, and the amount of equipment operating. To reduce fugitive dust generation during excavation or earthmoving construction activities, the project would be developed in conformance with Mitigation Measure AQ-1 from the DSASP EIR, which requires implementation of a variety of dust control measures. These measures include the following (see Attachment 14, pgs. 4.2-35 to 4.2-37).

- Cover all trucks hauling construction and demolition debris from the site.
- Water on a continuous as-needed basis all earth surfaces during clearing, grading, earthmoving, and other site preparation activities.
- Use watering to control dust generation during demolition of structures or break-up of pavement.
- Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all
unpaved parking areas and staging areas.

- Sweep daily (with water sweepers) all paved areas and staging areas.
- Provide daily clean-up of mud and dirt carried onto paved streets from the site.
- Install wheel washers for all exiting trucks, or wash off the tires or tracks of trucks and equipment leaving the site.
- Suspend dust-producing activities during periods when instantaneous gusts exceed 25 mph when dust control measures are unable to avoid visible plumes.
- Limit the area subject to excavation, grading and other construction or demolition activity at any one time.

With compliance and implementation of the dust control measures in Mitigation Measure AQ-1, the project would not result in adverse impacts to nearby sensitive receptors (e.g., nearby residents) from the generation of fugitive dust emissions during construction.

Impacts to the Project

The project site is located in an area of Santa Rosa that is near transportation and industrial sources of air pollutants. These include, but are not limited to, U.S. 101, the SMART rail line, the BoDean Asphalt Plant, and Superior Supplies Inc.

In June 2019, the City’s Zoning Administrator approved a Minor Conditional Use Permit for an 80% Supplemental Density Bonus and a Design Review application for the proposed project. As part of these approvals, the City made the following findings (see Attachment 19):

- Granting the permit would not constitute a nuisance or be injurious or detrimental to the public interest, health, safety, convenience, or welfare,
or materially injurious to persons, property, or improvements in the vicinity and zoning district in which the property is located in that the project's use and density have been reviewed and vetted by Staff where no health and safety concerns were found.

The DSASP EIR indicates that the siting of new residences or sensitive receptors along U.S. 101 within 170 feet of travel lanes could result in a significant impact (see Attachment 14, pg. 4.2-32). The project site is located approximately 570 feet from the nearest off-ramp for U.S. 101 and 700 feet from the southbound travel lanes. Therefore, the proposed project is located well over the 170-foot threshold analyzed in the DSASP EIR.

The BAAQMD Permitted Stationary Sources Risk and Hazards system provides screening level risk and hazards data (e.g., chronic cancer risks, PM$_{2.5}$ concentrations, and hazard indices) for facilities with permitted stationary sources of air pollution. According to the Stationary Source Risk & Hazards Screening Report obtained from this system, there are six permitted stationary sources within 1,000 feet of the project site (see Attachment 5). In addition, the BAAQMD also maintains screening level data for highways, major roadways, and rail lines. In the project area, highways include U.S. 101, major roadways include College Avenue, and rail lines include the SMART rail line. A screening level analysis of cumulative risks and hazards for the proposed project was conducted with the assistance of Environmental Planner Areana Flores of the BAAQMD (415-749-4616) (see Attachment 5). Table 2 contains the BAAQMD receptor thresholds (cumulative) relative to the cumulative totals for risks and hazards within 1,000 feet of the project site.

<table>
<thead>
<tr>
<th>BAAQMD Receptor Thresholds (Cumulative)</th>
<th>Cumulative Total for Risks and Hazards in 1,000 Feet of Project Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,000 feet</td>
<td></td>
</tr>
</tbody>
</table>

*Note: Table 2 contains the BAAQMD receptor thresholds (cumulative) relative to the cumulative totals for risks and hazards within 1,000 feet of the project site.*
(see Attachment 3, pg. 2-2 and Attachment 5):

Table 2 – BAAQMD Receptor Thresholds vs. Cumulative Totals for Risks and Hazards

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Receptor Thresholds</th>
<th>Cumulative Risks and Hazards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Risk and Hazards for new sources and receptors (Cumulative Threshold)</td>
<td>Increased cancer risk of &gt; 100 in a million</td>
<td>56.2</td>
</tr>
<tr>
<td></td>
<td>Increased non-cancer risk of &gt; 10.0 Hazard Index</td>
<td>0.03</td>
</tr>
<tr>
<td></td>
<td>Ambient PM$_{2.5}$ increase of &gt; 0.8 µg/m$^3$</td>
<td>51.7</td>
</tr>
</tbody>
</table>

Notes:
µg/m$^3$ = micrograms per cubic meters

As indicated in Table 2, based on the screening level data available from the BAAQMD, the cumulative totals for risks and hazards within 1,000 feet of the project site is below the cumulative thresholds for cancer risk and non-cancer (hazard) risk, but exceeds the cumulative threshold for PM$_{2.5}$.

For this reason, a Health Risk Assessment (HRA) was prepared for the proposed project by Environmental Science Associates. The HRA concludes that the cumulative threshold for PM$_{2.5}$ would be exceeded at the project site. Some reductions in PM$_{2.5}$ concentrations will result from the proposed landscaping trees throughout the site and the 6-foot tall blast mitigation barrier along the western and southwestern property lines. However, these features alone would not reduce PM$_{2.5}$ concentrations below the cumulative threshold, and it is necessary for the project to use filters with a minimum efficiency.
reporting value of 13 (MERV-13) in the proposed indoor air heating, ventilation, and air conditioning (HVAC) systems. The control efficiency of MERV-13 filters provides an 85 percent reduction to indoor concentrations of PM$_{2.5}$ (see Attachment 24, pg. 5). With the use of MERV-13 filters, cumulative PM$_{2.5}$ concentrations will be reduced to 0.7 ug/m$^3$. The use of MERV-13 filters has been included as mitigation for the proposed project and will ensure that the indoor air environment of the studio units meets the BAAQMD cumulative threshold for PM$_{2.5}$ concentrations (0.8 ug/m$^3$).

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library

<table>
<thead>
<tr>
<th>Coastal Zone Management</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coastal Zone Management Act, sections 307(c) &amp; (d)</td>
<td>☑️</td>
<td>□</td>
</tr>
<tr>
<td>According to the Coastal Commission’s Coastal Zone Boundary Map, the project site is located outside of the Coastal Zone (see Attachment 6).</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| *Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library

<table>
<thead>
<tr>
<th>Contamination and Toxic Substances</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</td>
<td>☑️</td>
<td>□</td>
</tr>
<tr>
<td>The project site is not located on or within one mile of an NPL (“Superfund”) site or within 2,000 feet of a CERCLIS site (see Attachment 9).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A Phase I Environmental Site Assessment (ESA) was completed in 2019 for the project site by Freshwater Environmental Services (FES). The Phase I ESA notes that the project site is not listed in any of the environmental databases provided in the Environmental Data Resources (EDR) report obtained for the assessment and concludes that the assessment has not revealed the presence of any recognized environmental conditions on the Subject Property (see Attachment 26, pgs. 5 and 21). Fifteen sites in the project area are listed on one or more environmental databases referenced in the EDR report and the Phase I ESA similarly concluded that these locations do not constitute a recognized environmental condition for the project site (see Attachment 26, pgs. 16-21).</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

7/15/20
The project site is a vacant site along College Avenue in the City of Santa Rosa that is surrounded by urban development. Urban development surrounding the project site includes commercial and residential uses to the north, commercial and residential uses to the east, commercial uses and the SMART rail line and multi-use pathway to the south, and commercial and industrial uses and the SMART rail line and multi-use pathway to the west.

Vegetation on the site consists of two landscape trees and grasses. No sensitive habitat, wetlands, riparian vegetation, gulches, or other natural areas exist on the project site (see Figure 2 - Project Area and Figure 3 - Photos of Project Site). The primary biological resources on the project site are landscape trees.

The project site is located within the boundaries of the Downtown Station Area Specific Plan (DSASP). In 2007, the City of Santa Rosa certified an Environmental Impact Report (EIR) for the Specific Plan (SCH# 2006072104). In June 2019, the City’s Zoning Administrator approved a Minor Conditional Use Permit for an 80% Supplemental Density Bonus and a Design Review application for the proposed project. As part of these approvals, the City made the following findings (see Attachment 19):

- The proposed project was found to be exempt from the California Environmental Quality Act (CEQA) under Government Code Section 65457 and Section 15182 (Residential Projects Pursuant to a Specific Plan) of the State CEQA Guidelines.
- The project site has been previously developed and has no value as habitat.
for endangered, rare, or threatened species.

- No exceptions to the exemption apply and there is no reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The California Department of Fish & Wildlife (CDFW) California Natural Diversity Database (CNDDB) records list occurrences of the following species in this area of Santa Rosa including: Santa Cruz clover (*Trifolium buckwestiorum*), bent-flowered fiddleneck (*Amsinckia lunaris*), and obscure bumblebee (*Bombus caliginosus*) (see Attachment 8 and Figure 6 – CDFW CNDDB Map). According to the CNDDB, none of these species are listed as Threatened or Endangered under either the Federal Endangered Species List or the California Endangered Species List (see Attachment 8).

The Santa Cruz clover has a California Rare Plant Rank of 1B.1, which means it is considered rare or endangered in California. It grows in habitats such as Broad-leafed upland forest, Cismontane woodland, Coastal prairie, gravelly areas, and margins (see Attachment 11). The project site does not contain suitable habitat for the Santa Cruz clover (see Figure 2 – Project Area and Figure 3 - Photos of Project Site).

The bent-flowered fiddleneck has a California Rare Plant Rank of 1B.2, which means it is considered fairly endangered in California. It occurs in Coastal bluff scrub, Cismontane woodland, and Valley and foothill grasslands (see Attachment 11). The project site does not contain suitable habitat for the bent-flowered fiddleneck (see Figure 2 – Project Area and Figure 3 - Photos of Project Site).
The obscure bumblebee is considered Vulnerable by the International Union for Conservation of Nature (IUCN), which means it is considered at risk from becoming Endangered. This species occurs in coastal areas from northern Washington to southern California. Select food plant genera include Baccharis, Cirsium, Lupinus, Lotus, Grindelia, Phacelia (see Attachment 27). The project site does not contain suitable habitat for the obscure bumblebee (see Figure 2 – Project Area and Figure 3 - Photos of Project Site).

The USFWS Information for Planning and Consultation (IPaC) was queried for the project site to generate a resource list of species and critical habitats that could potentially be affected by the proposed project. Threatened, Endangered, and sensitive species from the region are presented in this automatically generated report based on the known range of species in which the project site is located (see Attachment 38).

All of the animals listed require specific habitat characteristics that are not available at the project site, such as mature forest for the Northern Spotted Owl (*Strix Occidentalis caurina*), rocky outcroppings and coastal scrub for the San Bruno Elfin Butterfly (*Callophrys mossii bayensis*), or aquatic and wetland habitats for all the other Threatened or Endangered species listed. In addition, none of these species are likely to occur on the project site or move through the project site due to the lack of connectivity for wildlife movement such as riparian corridors or other contiguous habitat for movement that provides cover from predators. According to IPaC, there were no critical habitats reported from within or adjacent to the project site.
As noted above, the primary biological resources on the project site are landscape trees. The trees on the project site could provide nesting habitat for birds, including migratory birds and raptors. To prevent adverse impacts to nesting migratory and other protected bird species, the City conditioned the Design Review approval for the proposed project (Application No. DR19-038) to require the following (see Attachment 19):

- A survey of subject trees for nesting raptors shall be conducted no more than 72 hours prior to tree removal activities. The survey must be conducted by a certified ornithologist, licensed biologist, or licensed arborist. If the survey detects the presence of nesting raptors, tree removal activities must be placed on hold until a time determined by the licensed professional.

- A qualified wildlife biologist shall conduct pre-construction surveys. If an active bird nest is found, the bird shall be identified to species and the approximate distance from the closest work site to the next estimated. No additional measures will be implemented if active nests are more than the following distances from the nearest work site: (a) 300 feet for raptors; or (b) 75 feet for other non-special-status bird species. Disturbance of active nests shall be avoided to the extent possible until it is determined that nesting is complete, and the young have fledged.

These requirements for pre-construction surveys for nesting migratory and other protected bird species have been included as mitigation for the project.

Based on the existing site conditions, surrounding urban development, and
mitigation measures, it is not anticipated that the proposed project would have adverse effects on any natural habitats or federally protected species.

*Documentation can be found on the City’s website at the following address: [https://srcity.org/804/Document-Library](https://srcity.org/804/Document-Library)

<table>
<thead>
<tr>
<th>Explosive and Flammable Hazards</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 CFR Part 51 Subpart C</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

The project is a multi-family residential development and does not involve explosive or flammable materials or operations. The neighborhood in which the project is proposed to be located is a mixed-use neighborhood consisting of residential, commercial, and industrial uses.

An Explosive and Fire Hazards Review was prepared for the project by SHN. The purpose of the Explosive and Fire Hazards Review was to identify facilities in the vicinity of the project site having significant observed or reported Specific Hazardous Substances (per 24 CFR Part 51 C, Appendix 1) or other flammable materials storage (per HUD guidance) in stationary aboveground containers, and to evaluate the acceptable separation distance (ASD) for the storage containers with respect to their proximity to the project site (see Attachment 31).

The report provides a summary of sixteen businesses with storage of Specific Hazardous Substances or other flammable materials that have the potential to impact the project site, and the most conservative calculated ASD for each. The report concludes that the ASD for each of the identified businesses is satisfied for the project site, with the except of Suburban Propane (12 W College Ave/APN 010-421-012) and the BoDean Asphalt Plant (1060 Maxwell Drive/APNs 010-132-011, -012, -014, -017, -018 and 010-421-004, -011) (see Attachment 31, pgs. 2-3).

To ensure the project complies with the ASD from the Suburban Propane and BoDean
Asphalt Plant facilities, the applicant proposes to construct a blast mitigation barrier (i.e., wall) along the western and southwestern property lines of the project site, which faces these facilities. Based on information from the applicant’s engineer (California Engineering Company), the blast mitigation barrier is proposed to meet the following specifications (see Attachment 31, pgs. 3-4):

- **Material** = concrete masonry unit (CMU) blocks
- **Height** = 6 feet
- **Footings** = 36 inches in depth
- **Length** = entire length of western property line bordering the SMART rail line and multi-use pathway and a portion of the southwestern property line bordering 1005 Cleveland Avenue (APN 010-121-026)
- **Width** = 6 inches
- **Grouting** = 16 inches on-center

The proposed blast mitigation barrier has been reviewed by HUD Environmental Engineer Nelson Rivera, who has concurred with the proposed mitigation approach and indicated that the blast mitigation barrier must be designed according to the following criteria (see Attachment 31, pg. 4):

- The blast mitigation barrier design plans shall be prepared and stamped/sealed by a licensed engineer.
- The blast mitigation barrier shall be designed to withstand the peak positive incident pressure (blast overpressure) from the 30,359-gallon propane tank at the Suburban Propane facility.
- The wall shall be designed and constructed pursuant to all relevant codes and regulations (e.g., HUD Barrier Design Guidance, American Society of Civil Engineers, California Building Code, etc.).
The requirement to construct the blast mitigation barrier according to the criteria provided by HUD, has been included as mitigation for the proposed project.

Due to the distance of the businesses with storage of Specific Hazardous Substances or other flammable materials from the project site, and the proposed blast mitigation barrier, nearby hazardous operations would not adversely impact the proposed project.

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library

| Farmlands Protection | Yes ✗ No | The project site is located along College Avenue in the City of Santa Rosa and does not include farmland (see Figure 2 – Project Area). As indicated on the City’s Zoning Map, the closest agriculturally zoned properties are located well away from the project site and outside of City limits (see Attachment 16).
| Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658 |

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library

| Floodplain Management | Yes ✗ No | Based on the 2008 (Panel 060977CO728E, eff. 12/2/2008) Floor Insurance Rate Map, site is located in Zone X (see Figure 8 – FEMA Firm Map). The Zone X designation is defined as an Area of Minimal Flood Hazard (see Figure 8 – FEMA Firm Map). As such, the project area is not located in a FEMA designated Special Flood Hazard Area. As such, Flood Insurance is not required for the project.
| Executive Order 11988, particularly section 2(a); 24 CFR Part 55 |

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library

| Historic Preservation | Yes ✗ No | The Archaeological Survey Report prepared by Alta Archaeological Consulting concluded with the following findings (see Attachment 1, pg. 18):
| National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800 |

- No cultural resources were identified within the APE as a result of the records search, literature review, and consultation with Native American groups or archaeological field survey.
• The APE has undergone substantial disturbance over the last 100-years with the development of the railroad directly west of the parcels, as well as the demolition and grading of any existing structures that were extant in the APE. Shovel scrapes and soil exposures conducted within the APE did not identify any evidence of archaeological deposits.

• Despite the negative findings, the proximity of the project area to Santa Rosa Creek (approximately 3/4-mile south) would suggest the area would be attractive for prehistoric occupants to gather and hunt.

Based on the above findings, the Archaeological Survey Report recommends the implementation of an inadvertent discovery protocol for the unanticipated discovery of cultural resources and human remains (see Attachment 1, pgs. 20-21).

The Historic Resources Evaluation performed by Painter Preservation concluded with the following findings (see Attachment 29, pgs. 2-3 and 29):

• Two buildings located at 1005 Cleveland Avenue were evaluated for historic significance, which included an office and laboratory building that was constructed in 1924 and a Quonset hut that was constructed in 1947. The report concludes that the office and laboratory building is not defined as a resource eligible for listing in the NRHP or the CRHR due to lack of integrity. The report concludes that the Quonset hut warehouse is defined as a resource eligible for listing in the NRHP or the CRHR.

• While the Quonset hut was found significant in the evaluation, and a historic resource eligible for listing in
the NRHP and CRHR, the conclusion of the report is that “No Adverse Effect” on this resource would result from the construction of the project. This is because the back of the Quonset hut will face the back of the proposed project, and there is sufficient space between the two to mitigate for any effect the new construction may have.

The City requested formal Section 106 Consultation in a letter dated April 16, 2020 (see Attachment 21) with the Tribes identified in the HUD Tribal Directory Assessment Tool as having a current or ancestral interest in the project area. Comments were received from the Lytton Rancheria who requested a minor modification to the recommendations in the Archaeological Survey Report. Otherwise, the Lytton Rancheria concurred with the recommendations of the report for the implementation of an inadvertent discovery protocols for the unanticipated discovery of cultural resources and human remains (see Attachment 21). The Archeological Survey Report was revised as recommended by the Lytton Rancheria (see Attachment 1).

Based on the findings of the Archaeology Survey Report and Historic Resources Evaluation, and the comments from the Tribes, the recommendations of the Archaeological Survey Report have been included as mitigation for the proposed project to ensure that adverse impacts do not occur to cultural resources and human remains. Therefore, based on the site conditions, report findings, and mitigation measures, the City has determined that “No Adverse Effect” to historic or cultural resources would result from the project.

Concurrence with this finding was requested from the State Historic Preservation Officer (SHPO) on May 21, 2020. The City
received a letter from SHPO on June 22, 2020 stating no objection to the City’s finding that “No Adverse Effect” would result from the proposed project (see Attachment 12).

*Documentation can be found on the City’s website at the following address: [https://srcity.org/804/Document-Library](https://srcity.org/804/Document-Library)*

<table>
<thead>
<tr>
<th>Noise Abatement and Control</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

### Noise Impacts to the Project

The U.S. Department of Housing and Urban Development (HUD) environmental noise regulations are set forth in 24 CFR Part 51B. The following exterior noise standards for new housing construction would be applicable to this project:

- 65 dBA day night average noise level (DNL) or less – acceptable.
- Exceeding 65 dBA DNL but not exceeding 75 dBA DNL – normally unacceptable (appropriate sound attenuation measures must provide an additional 5 decibels of attenuation over that typically provided by standard construction in the 65 dBA DNL to 70 dBA DNL zone; 10 decibels additional attenuation in the 70 dBA DNL to 75 dBA DNL zone).
- Exceeding 75 dBA DNL – unacceptable

These noise standards also apply, “… at a location 2 meters from the building housing noise-sensitive activities in the direction of the predominant noise source…” and “…at other locations where it is determined that quiet outdoor space is required in an area ancillary to the principal use on the site.” (see Attachment 23, pgs. 345-347; 24 CFR Part 51B Section 51.103)

A goal of 45 dBA DNL is set forth for interior noise levels and attenuation requirements are geared toward achieving that goal. It is assumed that with standard construction, any building would provide
sufficient attenuation to achieve an interior level of 45 dBA DNL or less if the exterior level is 65 dBA DNL or less. Where exterior noise levels range from 65 dBA DNL to 70 dBA DNL, the project must provide a minimum of 25 decibels of attenuation, and a minimum of 30 decibels of attenuation is required in the 70 dBA DNL to 75 dBA DNL zone. Where exterior noise levels range from 75 dBA DNL to 80 dBA DNL, the project must provide a minimum of 35 decibels of attenuation to achieve an interior level of 45 dBA DNL or less (see Attachment 23, pg. 347; Section 51.104(a)).

Similarly, the Santa Rosa 2035 General Plan Draft Environmental Impact Report notes that “State requirements are collectively known as the California Noise Insulation Standards and are found in California Code of Regulations, Title 24 (known as the Building Standards Administrative Code), Part 2 (known as the California Building Code), Appendix Chapters 12 and 12A. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor ceiling assemblies must block or absorb sound. For limiting noise from exterior sources, the noise insulation standards set forth an interior standard of DNL 45 dBA in any habitable room and, where such units are proposed in areas subject to noise levels greater than DNL 60 dBA, require an acoustical analysis demonstrating how dwelling units have been designed to meet this interior standard. If the interior noise level depends upon windows being closed, the design for the structure must also specify a ventilation or air-conditioning system to provide a habitable interior environment. Title 24 standards are enforced through the building permit application process in most jurisdictions” (see Attachment 15, pg. 4.E-7).
Ambient noise levels in the project area are elevated and typical of an urbanized area with a mixture of residential, commercial, and industrial land uses. The main sources of noise in the project area are from the following: 1) traffic noise on College Avenue, which occurs on the northern boundary of the site; and 2) and rail operations associated with the SMART rail line, which occurs along the western boundary of the project site (see Attachment 25, pg. 1). Freeway traffic noise to the east of the project site from U.S. 101 is not a primary noise source relative to the sources noted above.

Due to the proximity of the project site to College Avenue and the SMART rail line, there is the potential for the project to be impacted by noise levels defined by HUD as normally unacceptable (65-75 dBA Ldn) for the exterior of residential uses. For new residential projects that would be located in an area with noise levels in the normally unacceptable range (65 – 75 dBA Ldn), HUD requires project sponsors to incorporate noise attenuation features.

In June 2019, the City’s Zoning Administrator approved a Minor Conditional Use Permit for a 80% Supplemental Density Bonus and a Design Review application for the proposed project. As part of these approvals, the City made the following findings (see Attachment 19):

- Granting the permit would not constitute a nuisance or be injurious or detrimental to the public interest, health, safety, convenience, or welfare, or materially injurious to persons, property, or improvements in the vicinity and zoning district in which the property is located in that the project's use and density have been reviewed and vetted by Staff where no
health and safety concerns were found. The DSASP Environmental Impact Report anticipates and encourages various housing types along the railroad corridor and requires a noise study to provide project specific noise standards to be incorporated in the building permits to mitigate any excessive noise for future residents.

To ensure the proposed project complies with the City’s noise standards, the City conditioned the Design Review approval for the proposed project (Application No. DR19-038) to require the following limitations on construction activity:

- Submit a noise assessment/mitigation study with the building permit application. The noise mitigation recommendations shall include information about how the dwelling units will need to be constructed so that the sound levels within the dwelling units do not exceed City General Plan and State mandated noise levels. Comply with all noise mitigation measures contained in the noise study.

To comply with the condition of approval noted above, Frank Hubbard Associates, Inc. (FHA) completed an Environmental Noise Control Study for the proposed project (dated 27 January 2020). Noise measurements were obtained at several locations within the project site, which detected maximum daily noise levels of 64.8 to 75 dBA Ldn (see Attachment 25, pgs. 1-2). The greatest noise levels were detected in the northwestern corner of the site adjacent to College Avenue and the SMART rail line. Based on the exterior noise levels measured for the FHA study, Arup North America Ltd. (Arup) prepared a Façade Sound Isolation Narrative that provides acoustic analysis and recommendations for
the exterior building envelope of the proposed project (see Attachment 2).

*Future Exterior Noise Environment*

As discussed above, the maximum daily noise levels at the project site were determined by FHA to be 64.8 to 75 dBA Ldn.

The Architectural Plans (Figure 4) show one common outdoor use area, which includes an interior courtyard. As shown on the Architectural Plans, the proposed structure has an L-shaped design, which shields the interior courtyard area from traffic noise along College Avenue to the north and train noise on the SMART rail line to the west. The existing structures on the property to the south of the project site (1005 Cleveland Avenue/APN 010-121-026) (see Figure 2 – Project Area and Figure 3 – Photos of Project Site) will also provide partial shielding of the interior courtyard area from train noise on the SMART rail line to the south.

Additionally, as discussed under the section entitled “Explosive and Flammable Hazards,” a 6-foot high concrete masonry unit (CMU) wall is proposed along the western and southwestern property lines as a blast mitigation barrier to meet the acceptable separation distance from the Suburban Propane and BoDean Asphalt Plant facilities. In addition to its intended purpose, this blast mitigation barrier will provide additional noise attenuation for the outdoor use areas from train noise on the SMART rail line. As indicated in the acoustic analysis prepared by Arup for the proposed project, the blast mitigation barrier is estimated to reduce noise levels at ground level by approximately 10-20 decibels (see Attachment 2, pg. 5).
Based on the L-shaped design of the proposed building, the existing structures on the property to the south of the project site, and the blast mitigation barrier proposed along the western and southwestern property lines, the future exterior noise levels in the interior courtyard area are expected to be consistent with the HUD acceptable exterior noise level threshold (65 dBA DNL or less).

**Future Interior Noise Environment**

As discussed above, for new residential projects that would be located in an area with noise levels in the normally unacceptable range (65 – 75 dBA Ldn), HUD requires project sponsors to incorporate noise attenuation features. Arup North America Ltd. prepared an acoustic analysis and recommendations for the exterior building envelope of the project to ensure the 45 dBA DNL noise standard is met inside the residential units. The Arup recommendations were based on review of the Architectural Plans prepared by Rowell Brokaw and the Environmental Noise Control Study prepared by FHA. Arup provided recommendations for the walls, windows, doors, heat pump air conditioner system, and roof of the proposed residential building (see Attachment 2, pgs. 7-11).

The recommendations of the acoustic analysis prepared by Arup were incorporated into the Architectural Plans that were submitted with the building permit application for the proposed project. The proposed project, with the acoustical treatments as recommended, would comply with HUD and City of Santa Rosa noise standards to achieve an interior noise level of less than 45 dBA DNL.

Therefore, the proposed project has been designed to comply with the HUD
<table>
<thead>
<tr>
<th>Noise Impacts from the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential noise sources generated during long-term operation of the proposed residential development include noise produced by the residents within and outside of the proposed structures (e.g., conversation, music, etc.), traffic noise, garbage service, stationary equipment noise (e.g., HVAC equipment), and mobile equipment noise (e.g., landscaping equipment).</td>
</tr>
</tbody>
</table>

Residential development is typically considered to be a noise-sensitive land use, as opposed to a land use that generates significant noise levels. The proposed residential units are not expected to generate significant noise levels that would be noticeable above the ambient noise environment in the project area. Noise levels would be similar to what is currently experienced at adjacent residential, commercial, and industrial properties in the vicinity.

<table>
<thead>
<tr>
<th>Construction Noise</th>
</tr>
</thead>
<tbody>
<tr>
<td>Noise impacts from construction activities depend on the various pieces of construction equipment, the timing and length of noise-generating activities, the distance between the noise-generating construction activities and receptors that would be affected by the noise and shielding. The closest sensitive receptors to the project site include residences to the east of the site across Cleveland Avenue.</td>
</tr>
</tbody>
</table>

Construction of the proposed project would involve site preparation and grading, excavation to create the parking lot and to lay new foundations, building erection,
paving, stormwater improvements, and landscaping. Construction is anticipated to occur for an approximate 18-month period.

The proposed construction activities would result in some temporary increases in noise above existing levels that may exceed the City’s noise thresholds. To minimize noise generated during construction activity, the City conditioned the Design Review approval for the proposed project (Application No. DR19-038) to require the following limitations on construction activity (see Attachment 19):

- Construction hours shall be limited to 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. Saturdays.
- No construction is permitted on Sundays and holidays.

The Design Review approval also required several measures to reduce noise from construction equipment, when applicable, including the following (see Attachment 19):

- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment.
- Utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- Locate stationary noise-generating equipment as far as feasible from sensitive receptors when sensitive receptors adjoin or are near a construction project area.
- Prohibit unnecessary idling of internal combustion engines.
- Pre-drill foundation pile holes to minimize the number of impacts required to seat the pile.
- Construct solid plywood fences around construction sites adjacent to
operational business, residences or noise-sensitive land uses.

- A temporary noise control blanket barrier shall be erected, if necessary, along building facades facing construction sites.
- This mitigation would only be necessary if conflicts occurred which were irresolvable by proper scheduling. Noise control blanket barriers can be rented and quickly erected.
- Route construction-related traffic along major roadways and as far as feasible from sensitive receptors.
- Ensure that construction activities (including the loading and unloading of materials and truck movements) are limited to the hours of 7:00 a.m. to 7:00 p.m.
- Businesses, residences or noise-sensitive land uses adjacent to construction sites shall be notified of the construction schedule in writing. Designate a "construction liaison" that will be responsible for responding to any local complaints about construction noise. The liaison would determine the cause of the noise complaints and institute reasonable measures to correct the problem. Conspicuously post a telephone number for the liaison at the construction site.

These limitations on construction activity and measures to reduce noise from construction equipment have been included as mitigation for the project. With the implementation of the above measures, the proposed project would not result in an adverse short-term noise impact from construction activity.

According to the U.S. EPA website, the project site is not located on nor does it affect a sole source aquifer (see Attachment 36).
Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149

*Documentation can be found on the City’s website at the following address: [https://srcity.org/804/Document-Library](https://srcity.org/804/Document-Library)

<table>
<thead>
<tr>
<th>Wetlands Protection</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive Order 11990, particularly sections 2 and 5</td>
<td>☒</td>
<td></td>
</tr>
</tbody>
</table>

The USFWS National Wetlands Inventory shows no wetlands within or directly adjacent to the project site (see Figure 9 – USFWS National Wetland Inventory Map).

Due to the historical on-going development and disturbance of the site, wetlands are not expected to be present. The project site has transitioned through various phases of development over the past several decades. Aerial photographs dating back to 1953 show buildings and paved parking areas covering a majority of the site up until 2018, after which buildings were removed and the site became vacant (see Attachment 22). Vegetation began growing in the central portion of the project site circa 2000 and currently consists of grasses and two landscape trees.

As indicated in the historic aerial photographs on the City’s Geographic Information System, there was no evidence of persistent standing water to support three-parameter wetland characteristics including hydric soils (see Attachment 22). According to the USDA NRCS Web Soil Survey, the soils at the project site are classified as Zamora (ZaA). These soils are well drained soils that occur on 0 to 2 percent slopes, with groundwater located more than 80 inches below the surface and are not typically subject to flooding or ponding (see Attachment 34, pg.13). In addition, the Geotechnical Study Report by RGH noted that in January 2018 groundwater was encountered at 10-13 feet below the ground surface (Attachment 30, pg. 4).

Based on the discussion above and referenced sources of information, the project site is not likely to contain 3-parameter wetland conditions.
**Wild and Scenic Rivers**  
Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)  
Yes ☐ No ☒

There are no rivers designated as Wild & Scenic in the Santa Rosa area. All of the designated rivers are more than 50 miles from the project site; the project does not interfere with these Wild and Scenic designated rivers (see Attachment 28).

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library

---

**ENVIRONMENTAL JUSTICE**

Environmental Justice  
Executive Order 12898  
Yes ☒ No ☐

The neighborhood in which the project area is located is a mixed-use neighborhood consisting of residential, commercial, and industrial uses (see Figure 2 - Project Area). The project site is zoned General Commercial (CG) with the Station Area (SA) combining district overlay and is located within the boundaries of the DSASP (see Attachment 22). The Specific Plan encourages a vibrant urban center, including a distinct identity and character, a diverse mix of uses, transient-oriented development, and pedestrian-friendly connections (see Attachment 13, pg. 3-1). In 2007, the City of Santa Rosa certified an Environmental Impact Report (EIR) for the Specific Plan (SCH# 2006072104).

The U.S. EPA EJSCREEN Report shows that the project site is in an area (1-mile radius around project site) with a density of 6,466 people per square mile, 53% minority population, and $27,446 per capita income (see Attachment 35). According to the U.S. Census, the per capita income in the City of Santa Rosa in 2018 was $34,902 (see Attachment 33).

In June 2019, the City’s Zoning Administrator approved a Minor Conditional Use Permit for an 80% Supplemental Density Bonus and a Design Review application for the proposed project. As part
of these approvals, the City made the following findings (see Attachment 19):

- The design, location, size and operating characteristics of the proposed supportive housing project would be compatible with the existing and future land uses in the vicinity in that the proposed density is located within the Downtown Station Area Specific Plan Area that promotes pedestrian and alternative modes of transportation use of the site such as bicycle, bus, and SMART rail line, where increased density is appropriately placed.
- The 0.983-acre site is physically suited for the type, density, and intensity of the proposed supportive housing project, including access, utilities, and the absence of physical constraints in that it is located within an area with a mix of residential, commercial, and industrial uses.
- The design of the proposed development will provide a desirable environment for its occupants, visiting public, and its neighbors through the appropriate use of materials, texture, and color and would remain aesthetically appealing and be appropriately maintained in that the building's entrance is a focal point located on the north elevation along College Avenue, uses metal and stucco siding, and provides roof mounted solar panels.
- Granting the permit would not constitute a nuisance or be injurious or detrimental to the public interest, health, safety, convenience, or welfare, or materially injurious to persons, property, or improvements in the vicinity and zoning district in which the property is located in that the project's use and density have been
reviewed and vetted by Staff where no health and safety concerns were found. The DSASP Environmental Impact Report anticipates and encourages various housing types along the railroad corridor and requires a noise study to provide project specific noise standards to be incorporated in the building permits to mitigate any excessive noise for future residents.

As described under the section entitled “Noise Abatement and Control,” due to the proximity of the project site to College Avenue and the SMART rail line, there is the potential for the project to be impacted by noise levels defined by HUD as normally unacceptable (65-75 dBA Ldn) for the exterior of residential uses. As noted above, an acoustic analysis was prepared for the proposed project that determined, with the recommended acoustical treatments, that the project would comply with the HUD and City of Santa Rosa interior noise level standard of 45 dBA DNL. In addition, based on the L-shaped design of the proposed building, the existing structures on the property to the south of the project site, and the blast mitigation barrier proposed along the western and southwestern property lines, the future exterior noise levels in the interior courtyard area are expected to be consistent with the HUD acceptable exterior noise level threshold (65 dBA DNL or less). Therefore, the proposed project has been designed to comply with the HUD acceptable exterior and interior noise level thresholds.

As described under the section entitled “Clean Air,” the project site is located in an area of Santa Rosa that is near transportation and industrial sources of air pollutants. These include U.S. 101, the SMART rail line, the BoDean Asphalt Plant, and Superior Supplies Inc. As described above, the project site is located well over the 170-foot
threshold analyzed in the DSASP EIR. Based on the screening level data provided by the BAAQMD, the cumulative totals for risks and hazards within 1,000 feet of the project site is below the cumulative thresholds for cancer risk and non-cancer (hazard) risk, but exceeds the cumulative threshold for PM$_{2.5}$ (see Attachment 5). For this reason, a Health Risk Assessment (HRA) was prepared for the proposed project by Environmental Science Associates. The HRA concludes that the cumulative threshold for PM$_{2.5}$ would be exceeded at the project site. Some reductions in PM$_{2.5}$ concentrations will result from the proposed landscaping trees throughout the site and the 6-foot tall blast mitigation barrier along the western and southwestern property lines. However, these features alone would not reduce PM$_{2.5}$ concentrations below the cumulative threshold, and it is necessary for the project to use filters with a minimum efficiency reporting value of 13 (MERV-13) in the proposed indoor air heating, ventilation, and air conditioning (HVAC) systems. The control efficiency of MERV-13 filters provides an 85 percent reduction to indoor concentrations of PM$_{2.5}$ (see Attachment 24, pg. 5). With the use of MERV-13 filters, cumulative PM$_{2.5}$ concentrations will be reduced to 0.7 ug/m$^3$. The use of MERV-13 filters has been included as mitigation for the proposed project and will ensure that the indoor air environment of the studio units meets the BAAQMD cumulative threshold for PM$_{2.5}$ concentrations (0.8 ug/m$^3$).

As discussed under the section entitled ‘Explosive and Flammable Hazards,’ the project site does not meet the ASD for the above ground storage tanks at the Suburban Propane and BoDean Asphalt Plant facilities (see Attachment 31, pgs. 2-3). To ensure the project complies with the ASD for these facilities, the applicant proposes to construct
a blast mitigation barrier (i.e., wall) along the western and southwestern property lines of the project site, which faces these facilities. The requirement to construct the blast mitigation barrier according to the criteria provided by HUD, has been included as mitigation for the proposed project.

As such, the proposed project would be located in an area of the City that has been planned to allow residential development (Downtown Station Area) and would not result in disproportionately adverse environmental effects on minority or low-income populations.

*Documentation can be found on the City’s website at the following address: [https://srcity.org/804/Document-Library](https://srcity.org/804/Document-Library)
Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. All conditions, attenuation or mitigation measures have been clearly identified.

**Impact Codes**: Use an impact code from the following list to make the determination of impact for each factor.

1. Minor beneficial impact
2. No impact anticipated
3. Minor Adverse Impact – May require mitigation
4. Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAND DEVELOPMENT</td>
<td>1</td>
<td>The proposed project would develop fifty-three (53) very low-income studio units for formerly homeless tenants as part of a permanent supportive housing program and one (1) market rate manager’s unit. The project site is zoned General Commercial (CG) with the Station Area (SA) combining district overlay and is located within the boundaries of the DSASP (see Attachment 22). The Specific Plan encourages a vibrant urban center, including a distinct identity and character, a diverse mix of uses, transient-oriented development, and pedestrian-friendly connections (see Attachment 13, pg. 3-1). In 2007, the City of Santa Rosa certified an Environmental Impact Report (EIR) for the Specific Plan (SCH# 2006072104). The City has determined that the density, design, and infrastructure plan proposed by the project is consistent with the adopted Specific Plan (see Attachment 19). In 2016, the City prepared a Housing Action Plan to address the City’s unmet housing needs and to implement the City’s General Plan Housing Element. The Plan provides the estimate of Santa Rosa’s new housing needs through the current Housing Element Cycle (2014-2023), which includes an additional 473 extremely low-income, 474 very...</td>
</tr>
</tbody>
</table>
low-income units, and 581 low-income units. The Plan indicates that actual housing needs may exceed these numbers as there is currently a deficit, exemplified by the very low housing vacancy rates in the City (see Attachment 17, pgs. 3-4). The Sage Commons Project would be consistent with the following objectives in the City’s Housing Action Plan:

- **Objective 1:** Build 5,000 housing units in the current Housing Element Cycle (through 2023) consistent with General Plan Housing Element Quantified Objectives (RHNA).
- **Objective 2:** Achieve construction of 2,500 affordable housing units, including 30 percent of the total (approximately 1,500 units) for lower income households, and 20 percent of the total (approximately 1,000 units) for moderate income households created through a strategic approach that includes achieving inclusionary housing within for sale market-rate housing projects, innovative “affordability by design” market-rate affordable housing, providing regulatory incentives and financial subsidies for affordable housing projects, and continued collaboration with affordable housing developers.

In June 2019, the City’s Zoning Administrator approved a Minor Conditional Use Permit for an 80% Supplemental Density Bonus and a Design Review application for the proposed project. As part of these approvals, the City made the following findings (see Attachment 19):

- The proposed use is allowed within the General Commercial (CG) - Station Area (SA) zoning district and complies with all other applicable provisions of this Zoning Code and the City Code.
- The proposed use is consistent with the General Plan and any applicable specific plan in that the General Plan and Downtown Station Area Specific Plan Retail and Business Services Land Use Designation allows up to 30 units per acre and up to 54 units per acre with a Supplemental Density Bonus based on the Project's one-half mile proximity to transit and schools, and the Project provides a variety of housing types within the DSASP.
- The design, location, size and operating characteristics of the proposed supportive housing project would be
compatible with the existing and future land uses in the vicinity in that the proposed density is located within the Downtown Station Area Specific Plan Area that promotes pedestrian and alternative modes of transportation use of the site such as bicycle, bus, and SMART rail line, where increased density is appropriately placed.

Therefore, the proposed project would help to meet the existing and projected demand for housing to serve very-low-income persons in the City and conforms with the City’s General Plan, the DSASP, and City Code. *Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library*

<table>
<thead>
<tr>
<th>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</th>
<th>Soil Suitability</th>
</tr>
</thead>
</table>
| The project site is relatively flat (<1% slope) and situated at an elevation of approximately 148 feet above sea level. The project site is not located in an area that would be exposed to substantial slope instability, erosion, or landslide-related hazards (see Attachment 30, pgs. 3-4). Soils in the DSASP area have been mapped as Zamora Silty Clay Loam association soils. Zamora soils are described as well-drained clay loams underlain by alluvium from mixed sedimentary sources with a high shrink swell potential (see Attachment 14, pg. 4.5-13). According to the USDA NRCS Web Soil Survey, the Zamora soils are well-drained soils that occur on 0 to 2 percent slopes, with groundwater located more than 80 inches below the surface and are not typically subject to flooding or ponding (see Attachment 34, pg.13).

According to the DSASP EIR, the Specific Plan Area generally has suitable soil for development and may be required to be engineered in accordance with the California Building Code and other geotechnical requirements to provide sufficient foundation for structures. Requirements include removal of non-suitable soils and replacement with conditioned engineer fill (see Attachment 14, pgs. 4.5-22).

Santa Rosa City Code Chapter 19-64 (Grading and Erosion Control) discusses grading and soils requirements for structural foundations. Provisions include completion of a preliminary soils report prepared by a licensed civil engineer based upon adequate test borings or excavations (see Attachment 20). Based on subsurface investigations...
performed on the project site by RGH Consulting (RGH) in 2018, subsurface soils consist of two feet of heterogeneous fill on top of sandy clay alluvial deposits. The Geotechnical Study Report prepared by RGH includes recommended corrective actions to prevent structural damage to proposed structures (see Attachment 30, pgs. 9-22).

As discussed in the RGH Geotechnical Study Report (see Attachment 30, pgs. 6-8 and 9-22), the geotechnical investigation for the site identified site-specific ground failure hazards such as expansive soils, liquefaction, and lateral spreading. The report provides recommendations for design and construction to minimize risks to people and structures from these potential hazards.

Therefore, the soils at the project site, with standard engineering practices and compliance with the recommendations of the RGC Geotechnical Study Report, are suitable for the proposed development (see Attachment 30, pg. 6).

Slope

Ground surface elevations at the project site are relatively flat and have a slight slope toward the west. The project site is at an elevation of approximately 148 feet. There are no significant natural hill slopes and no cut or fill slopes at the project site. The slopes at the project site are less than 1%, which is optimum for residential development.

Erosion/Drainage/Stormwater Runoff

The project site is generally flat (<1% slope) and is not susceptible to significant erosion. The DSASP EIR evaluated the plan area and concluded that due to the near flat grade the potential for soil erosion is slight and soil loss can be easily controlled.

Grading and drainage improvements for the project would occur in compliance with Santa Rosa City Code Chapters 19-64 (Grading and Erosion Control) and 17-12 (Storm Water) (see Attachment 20). Additionally, compliance with State and federal stormwater regulations (e.g., National Pollution Discharge Elimination System [NPDES]) is required during construction activity and long-term operation of the project.
The City conditioned the Design Review approval for the proposed project (Application No. DR19-038) to require submittal of a Storm Water Pollution Prevention Plan (SWPPP) and compliance with the following measures during the construction period (see Attachment 19):

- Erosion control/soil stabilization techniques such as straw mulching, erosion control blankets, erosion control matting, and hydro-seeding, shall be utilized, in accordance with the regulations and recommendations outlined in the Santa Rosa Area Standard Urban Storm Water Mitigation Plan (SUSMP) adopted by the City of Santa Rosa, Sonoma County, and the Sonoma County Water Agency. Silt fences used in combination with fiber rolls shall be installed down slope of all graded slopes. Fiber rolls shall be installed in the flow path of graded areas receiving concentrated flows and around storm drain inlets.

- "Best management practices" (BMPs) shall be implemented for preventing the discharge of other construction-related NPDES pollutants beside sediment (i.e. paint, concrete, etc) to downstream waters.

- After construction is completed, all drainage facilities shall be inspected for accumulated sediment, and these drainage structures shall be cleared of debris and sediment.

The Design Review Approval was also conditioned to require implementation of the following long-term measures for stormwater management (see Attachment 19):

- Development of a monitoring and implementation plan. Maintenance requirements and frequency shall be carefully described including vector control, clearing of clogged or obstructed inlet or outlet structures, vegetation/landscape maintenance, replacement of media filters, regular sweeping of parking lots and other paced areas, etc. Wastes removed from BMPs may be hazardous, therefore, maintenance costs should be budgeted to include disposal at a proper site. Parking lot areas shall be cleared of debris that may enter the storm drain system on a daily basis.
The monitoring and maintenance program shall be conducted at the frequency agreed upon by the RWQCB and/or City of Santa Rosa. Monitoring and maintenance shall be recorded and submitted annually to the SWRCB. The SWPPP shall be adjusted, as necessary, to address any inadequacies of the BMPs.

The proposed project would not cause any adverse impacts related to stormwater runoff due to the fact that the project must be designed to comply with local, State, and federal stormwater regulations.

*Documentation can be found on the City's website at the following address: https://srcity.org/804/Document-Library

---

### Hazards and Nuisances including Site Safety and Noise

#### Natural Hazards

The project site does not have the potential to be impacted by most natural hazards including volcanoes, wildfires, mudflow, landslides, flooding, droughts, hurricanes, tornadoes, seiches, tsunamis, and poisonous plants, insects, or animals. The natural hazards found to be potentially significant in the project area include seismicity and liquefaction (see Attachment 14, pgs. 4.5-8 to 4.5-13, 4.7-12, and 4.6-19, Attachment 18, pg. 22, and Attachment 30, pg. 6-8).

The project site is located in, the Coast Ranges Geomorphic Province of Northern California, on the plain of Santa Rosa Creek (see Attachment 14, pg. 4.5-8). There are no known active faults traversing the project site and it is not located in an Alquist-Priolo Earthquake Fault Zone (see Attachment 30, pg. 5). Potential for surface rupture from displacement or fault movement directly beneath the proposed project is, therefore, considered low. However, the project area is a seismically active region of California and strong ground shaking would be expected during the lifetime of the proposed project. Major active faults located within 30 miles of the DSASP are the Rodgers Creek, San Andreas, Maacama and Hayward Fault. According to the DSASP EIR, each of these faults could produce a large earthquake that could result in strong seismic shaking of the project site (see Attachment 14, pgs. 4.5-8 to 4.5-9). Therefore, it is necessary to design and construct the proposed project in adherence with current standards for earthquake-resistant construction. The RGH Geotechnical Study Report contains...
recommendations for design and construction that would prevent adverse impacts related to seismicity.

According to the DSASP EIR, soils in the Specific Plan Area are considered to have moderate susceptibility to liquefaction (see Attachment 14, pg. 4.5-18). The RGH Geotechnical Study Report prepared for the site concludes that the potential impacts to structures are differential settlement of up to 1.25 inches. The report provides recommendations for design and construction of foundations elements to account for this potential settlement and minimize risks to people and structures (see Attachment 30, pgs. 13-15).

Therefore, with standard engineering practices and compliance with the recommendations of the RGH Geotechnical Study Report, the proposed project would not be subject to adverse effects from seismicity and liquefaction (see Attachment 30, pgs. 6-8).

Hazardous Materials

As discussed in the section entitled “Contamination and Toxic Substances,” a Phase I ESA was completed in 2019 for the project site by Freshwater Environmental Services (FES). The Phase I ESA concludes that the assessment did not reveal the presence of any recognized environmental conditions on the project site (see Attachment 26, pgs. 5 and 21).

Explosive and Flammable Hazards

As discussed under the section entitled ‘Explosive and Flammable Hazards,’ the project site does not meet the ASD for the above ground storage tanks at the Suburban Propane and BoDean Asphalt Plant facilities (see Attachment 31, pgs. 2-3). To ensure the project complies with the ASD for these facilities, the applicant proposes to construct a mitigation barrier (i.e., wall) along the western and southwestern property lines of the project site, which faces these facilities. The requirement to construct the mitigation barrier according to the specifications provided by the applicant’s engineer and reviewed by HUD, has been included as mitigation for the proposed project.
### Noise

As described under the section entitled “Noise Abatement and Control,” due to the proximity of the project site to College Avenue and the SMART rail line, there is the potential for the project to be impacted by noise levels defined by HUD as normally unacceptable (65-75 dBA Ldn) for the exterior of residential uses.

As noted above, an acoustic analysis was prepared for the proposed project that determined, with the recommended acoustical treatments, that the project would comply with the HUD and City of Santa Rosa interior noise level standard of 45 dBA DNL. The recommendations of the acoustic analysis were incorporated into the Architectural Plans that were submitted with the building permit application for the proposed project.

Based on the L-shaped design of the proposed building, the existing structures on the property to the south of the project site, and the mitigation barrier proposed along the western and southwestern property lines, the future exterior noise levels in the interior courtyard area are expected to be consistent with the HUD acceptable exterior noise level threshold (65 dBA DNL or less).

Therefore, the proposed project has been designed to comply with the HUD acceptable exterior and interior noise level standards.

*Documentation can be found on the City’s website at the following address: [https://srcity.org/804/Document-Library](https://srcity.org/804/Document-Library)*

<table>
<thead>
<tr>
<th>Energy Consumption</th>
<th>1</th>
</tr>
</thead>
</table>

As required by State regulations and the City of Santa Rosa’s building code, the design and construction of the residential units would be in accordance with California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6, of the California Code of Regulations). These requirements regulate insulation, window space and type, and other building features to maximize structural energy efficiency.

Beginning in 2020, these standards now also require new housing to have solar panels. Compliance with these standards restricts unnecessary residential energy consumption.

Other than natural gas used to generate electricity for the project, the project would not have a substantial effect on
the use, extraction, or depletion of a natural resource. Utility infrastructure is available adjacent to the site to serve the proposed development.

The project site is located along College Avenue northwest of the City of Santa Rosa’s Downtown. Future residents would be within walking distance of shopping and employment and would have access to mass transit and services that would reduce vehicle miles traveled and energy consumed for transportation.

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SOCIOECONOMIC</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Employment and Income Patterns</td>
<td></td>
<td>The proposed project would develop fifty-three (53) very low-income studio units for formerly homeless tenants as part of a permanent supportive housing program and one (1) market rate manager’s unit. This infill development project would occur on a vacant site in the City of Santa Rosa that would help the City to meet its share of the regional housing need (see Attachment 17, pgs. 3-4). The proposed project would contribute to the mixed-use character of the neighborhood by providing a new multi-family residential use within walking distance of employment and shopping. The U.S. EPA EJSCREEN Report shows that the project site is in an area (1-mile radius around project site) with a density of 6,466 people per square mile, 53% minority population, and $27,446 per capita income (see Attachment 35). According to the U.S. Census, the per capita income in the City of Santa Rosa in 2018 was $34,902 (see Attachment 33). Employment-related impacts of the project for local residents would involve temporary jobs created due to construction and permanent jobs for those working at the housing facility (e.g., manager, support services, security, etc.). Since the project site is located near the City of Santa Rosa Downtown area, job opportunities would be available nearby for the future residents if desired.</td>
</tr>
</tbody>
</table>

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library
Demographic Character Changes, Displacement

The neighborhood in which the project site is located is a mixed-use neighborhood consisting of residential, commercial, and industrial uses (see Figure 2 - Project Area). The U.S. EPA EJSCREEN Report shows that the project site is in an area (1-mile radius around project site) with a density of 6,466 people per square mile, 53% minority population, and $27,446 per capita income (see Attachment 35). According to the U.S. Census, the per capita income in the City of Santa Rosa in 2018 was $34,902 (see Attachment 33).

The proposed project would develop fifty-three (53) very low-income studio units for formerly homeless tenants as part of a permanent supportive housing program and one (1) market rate manager’s unit. The proposed project would provide rental housing for a minimum of 53 very low-income residents and an onsite manager.

The project site is located near the City of Santa Rosa Downtown area along College Avenue. This project would contribute to the mixed-use character of the neighborhood by providing new multi-family residential uses within walking distance of employment and shopping. In relation to the City of Santa Rosa’s resident population of 173,628 (see Attachment 7), the increase in population from this project (minimum 53 residents and onsite manager) would not be substantial.

The project site has been historically used by several businesses but is currently vacant. The proposed project would develop this vacant property into affordable housing, which is identified in the City of Santa Rosa Housing Element as a significant housing need. As such, the project would not displace existing housing, businesses, or people.

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Educational and Cultural Facilities</td>
<td>2</td>
<td>The proposed project would develop fifty-three (53) very low-income studio units for formerly homeless tenants as part of a permanent supportive housing program and one (1) market rate manager’s unit. The proposed project would provide rental housing for a minimum of 53 very low-income residents and an onsite manager. The project site is</td>
</tr>
</tbody>
</table>
currently vacant. As such, the project would not displace educational and cultural facilities in the City.

Educational Facilities

Since the applicant proposes to develop studio units, it is anticipated that a minimal increase in the student population of local elementary, junior, and high schools could occur as a result of the project. Educational facilities that would be available to the future residents include, but are not limited to, Santa Rosa Junior College Jose City College approximately 0.5 miles to the northeast and Sonoma State University approximately 8 miles to the southeast.

Mass transit can be used by the future residents to access these and other facilities. Santa Rosa CityBus provides fixed route service in the project area and the nearest bus stop is located across the street from the project site on the southeast corner of the College Avenue/Cleveland Avenue intersection (see Attachment 39, pg. 3). The project site is located approximately one mile from two Sonoma-Marin Area Rail Transit (SMART) stations (i.e., Santa Rosa Downtown and North Santa Rosa) and is served by SMART, Mendocino Transit, and Amtrak (see Attachment 39, pg. 4).

Cultural Facilities

The project site is located within the City of Santa Rosa, near the Downtown area. Santa Rosa contains a variety of cultural facilities (e.g., theatres, art galleries, museums, music venues, community gathering spaces, etc.) that would be available to the future residents. These include facilities such as the Luther Burbank Center for the Arts, Sixth Street Playhouse, Actor’s Theater for Children, Santa Rosa Symphony, and the Museum of Sonoma County.

Mass transit can be used by the future residents to access these and other facilities. Santa Rosa CityBus provides fixed route service in the project area and the nearest bus stop is located across the street from the project site on the southeast corner of the College Avenue/Cleveland Avenue intersection (see Attachment 39, pg. 3). The project site is located approximately one mile from two Sonoma-Marin Area Rail Transit (SMART) stations (i.e., Santa Rosa Downtown and North Santa Rosa) and is served by
<p>| Commercial Facilities | The project site is located along College Avenue near the City of Santa Rosa Downtown area. This area of Santa Rosa contains a variety of retail services and other commercial facilities that would meet the needs of the future residents. Mass transit can be used by the future residents to access these and other commercial facilities. Santa Rosa CityBus provides fixed route service in the project area and the nearest bus stop is located across the street from the project site on the southeast corner of the College Avenue/Cleveland Avenue intersection (see Attachment 39, pg. 3). The project site is located approximately one mile from two Sonoma-Marin Area Rail Transit (SMART) stations (i.e., Santa Rosa Downtown and North Santa Rosa) and is served by SMART, Mendocino Transit, and Amtrak (see Attachment 39, pg. 4). This project does not propose a new larger commercial development that may displace existing smaller retail establishments in the City of Santa Rosa. The project would locate new residents on a vacant site that would provide additional customers to nearby businesses. |
| Health Care and Social Services | The project site is located along College Avenue near the City of Santa Rosa Downtown area. Santa Rosa contains several health care and social services that would be available to the future residents. The Santa Rosa Memorial Hospital is within 2 miles of the project site. Santa Rosa also has a variety of other services nearby which include the Sutter Santa Rosa Regional Hospital and the Kaiser Permanente Santa Rosa Medical Center. Mass transit can be used by the future residents to access these and other facilities. Santa Rosa CityBus provides fixed route service in the project area and the nearest bus stop is located across the street from the project site on the southeast corner of the College Avenue/Cleveland Avenue intersection (see Attachment 39, pg. 3). The project site is located approximately one mile from two Sonoma-Marin Area Rail Transit (SMART) stations (i.e., Santa Rosa Downtown and North Santa Rosa) and is served by |</p>
<table>
<thead>
<tr>
<th>Solid Waste Disposal / Recycling</th>
<th>SMART, Mendocino Transit, and Amtrak (see Attachment 39, pg. 4).</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>This project would not cause a substantial amount of growth (minimum 53 residents and onsite manager) and it is anticipated that existing health and human services would be adequate to serve this residential in-fill development.</td>
</tr>
<tr>
<td></td>
<td><em>Documentation can be found on the City's website at the following address: <a href="https://srcity.org/804/Document-Library">https://srcity.org/804/Document-Library</a></em></td>
</tr>
</tbody>
</table>

2

The proposed project would generate solid waste during both construction and operation. The project is within the jurisdictional boundary of the Sonoma County Waste Management Agency (SCWMA), which is responsible for implementation of regional waste diversion programs. The SCWMA is a Regional Agency organized under a Joint Powers Agreement to provide solid waste disposal for all nine incorporated cities and the unincorporated areas of Sonoma County (see Attachment 14, pg. 4.13-33).

According to the DSASP EIR, the solid waste service provider under contract with the City of Santa Rosa is North Bay Corporation (NBC). Solid waste generated in Sonoma County is landfilled at Keller Canyon Landfill, Potrero Hills Landfill, Redwood landfill, Vasco Road Landfill, and Hay Road Landfill. According to the DSASP EIR, the landfills that would serve the project have adequate permitted capacity to accommodate the solid waste disposal needs of the planned development in the Downtown Station Area. Future increases in solid waste generation from development allowed under the DSASP would be minimized with ongoing implementation of waste recycling efforts. The project would also be required to comply with Santa Rosa’s Construction and Demolition Debris Franchise Agreement, as stated in the DSASP EIR, mandating that the project prepare and implement recycling plans for the construction phase of the project (see Attachment 14, pgs.4.13-33 to 4.13-36).

Existing solid waste regulations and programs would ensure that the proposed project would not result in adverse impacts from the generation of solid waste.

2

The City of Santa Rosa is responsible for the collection of wastewater within the City, including the Specific Plan Area. The Subregional Reclamation System’s Laguna Treatment Plant (Laguna Plant) is the primary site for...
wastewater treatment and disposal for the City and four other local agencies within Sonoma County. Santa Rosa is the owner and operator of the Laguna Plant and is responsible for the operation, maintenance, and regulatory compliance of the plant. (see Attachment 14, pg. 4.13-17).

The additional growth projected under the DSASP, in excess of the planned buildout under the existing General Plan, would exceed the existing capacity of the Laguna Plant. The DSASP addresses the lack of wastewater capacity at the Laguna Plant by including additional goals and policies that would ensure that additional planning occurs and future development is required to pay for its share of needed improvements so there would be adequate capacity at the time it is needed over the next 20 years (see Attachment 14, pg. 4.13-23).

The project would require a connection to the existing sewer lines adjacent to the site and any necessary improvements would occur onsite and within existing right-of-way. Consistent with the DSASP goals and policies, the proposed project would be required to pay its share of needed improvements to the Laguna Plant to ensure there is adequate capacity for future development under the General Plan and DSASP.

In June 2019, the City’s Zoning Administrator approved a Minor Conditional Use Permit for an 80% Supplemental Density Bonus and a Design Review application for the proposed project. As part of these approvals, the City made the following findings (see Attachment 19):

- The 0.983-acre site is physically suited for the type, density, and intensity of the proposed supportive housing project, including access, utilities, and the absence of physical constraints in that it is located within an area with a mix of residential, commercial, and industrial uses. The project can be supported within the area and proximity to public transit, freeway access, and surrounding infrastructure for future residents with adequate utilities servicing the site.

As such, the proposed project would not exceed the wastewater treatment capacity of the City’s wastewater system and would be consistent with planned improvements and expansion of the wastewater treatment facilities.
Water Supply

The City of Santa Rosa receives all of its potable water from the Sonoma County Water Agency (SCWA). Approximately 95 percent of water delivered by SCWA is from surface water sources, primarily the Russian River, with the remainder from three deep groundwater wells (see Attachment 14, pg. 4.3-5).

A Water Supply Assessment (WSA) was completed to supplement the DSASP EIR. The WSA concludes that the City has adequate supply to meet existing demands and planned future demands plus the maximum anticipated demand associated with buildout under the DSASP (see Attachment 14, pg. 4.13-12).

As determined by the City’s Zoning Administrator in the June 2019 approvals for the proposed project, the project is consistent with the planned growth in the DSASP (see Attachment 19). The proposed project is an infill development project that would create a small incremental increase in demand for domestic water service from the City. The proposed project would not place significant demands on the City’s water supply and would not result in the need for the construction of new water treatment facilities or the expansion of existing treatment facilities.

In June 2019, the City’s Zoning Administrator approved a Minor Conditional Use Permit for an 80% Supplemental Density Bonus and a Design Review application for the proposed project. As part of these approvals, the City made the following findings (see Attachment 19):

- The 0.983-acre site is physically suited for the type, density, and intensity of the proposed supportive housing project, including access, utilities, and the absence of physical constraints in that it is located within an area with a mix of residential, commercial, and industrial uses. The project can be supported within the area and proximity to public transit, freeway access, and surrounding infrastructure for future residents with adequate utilities servicing the site.

As such, the water system serving the City of Santa Rosa has sufficient capacity to serve the proposed project in addition to existing and planned development.
### Public Safety - Police, Fire and Emergency Medical

The proposed project would develop fifty-three (53) very low-income studio units for formerly homeless tenants as part of a permanent supportive housing program and one (1) market rate manager’s unit. The proposed project would provide rental housing for a minimum of 53 low-income residents and an onsite manager. Emergency response and evacuation in the project area is the responsibility of the Santa Rosa Police Department (SRPD) and the Santa Rosa Fire Department (SRFD). These agencies provide critical emergency response services and leadership and serve as the community’s primary response agencies.

The Santa Rosa Police Department (SRPD) is the main provider of police services in the City, but on the highways and within the unincorporated areas, the County Sheriff handles criminal law enforcement and the California Highway Patrol assists with traffic enforcement. Mutual aid between neighboring law enforcement agencies is provided on an as-needed basis (see Attachment 14, pg. 4.11-2). The closest Santa Rosa Police Department station is located at 965 Sonoma Avenue, which is approximately 1.6 miles from the project site. Additionally, there is a SRPD subdivision station located within the Downtown Station area at 19 Old Courthouse Square, which is approximately 1.5 miles from the project site.

Fire protection and emergency services in the City are primarily the responsibility of the Santa Rosa Fire Department (SRFD). The SRFD serves the City of Santa Rosa as well as the Roseland Fire Protection District through a contractual agreement, for a total population served of approximately 158,000 within an area of approximately 43 square miles (see Attachment 14, pg. 4.11-8). The closest Santa Rosa Fire Station is Station No. 1 located at 955 Sonoma Avenue in the downtown area, which is approximately 1.6 mile from the project site.

As discussed in the DSASP EIR, the demands on police and fire protection services that would occur from development under the DSASP could adversely affect the provision of services by the SRPD and SRFD. Implementation of the DSASP would require more sworn personnel and civilian
staff in the SRPD and firefighters in the SRFD to meet the anticipated demands of population increase due to the implementation of the DSASP. The SRPD and SRFD would not require additional facilities than what has already been planned according to the DSASP EIR. Although the implementation of the DSASP would require additional personnel, the DSASP includes goals and supporting policies to provide funding for public services within the Downtown Station Area (see Attachment 14, pgs. 4.11-4 to 4.11-6 and 4.11-11 to 4.11-13). The proposed project is within the planned growth anticipated in the DSASP and would be adequately served by planned police department and fire department resources.

As such, the proposed project would not substantially increase the demand for police, fire, or emergency medical services, and would not require the construction of new police, fire, or emergency medical facilities beyond those currently planned to serve development under the DSASP.

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library

<table>
<thead>
<tr>
<th>Parks, Open Space and Recreation</th>
<th>The proposed project would develop fifty-three (53) very low-income studio units for formerly homeless tenants as part of a permanent supportive housing program and one (1) market rate manager’s unit. The proposed project would provide rental housing for a minimum of 53 low-income residents and an onsite manager.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The City of Santa Rosa’s Recreation and Parks Department (SRRPD) maintains, promotes and administers 57 neighborhood and community parks, totaling 514 acres, 222 acres of undeveloped parkland and 12 additional community and/or recreation facilities and programs (see Attachment 14, pg. 4.11-30). There are parks and recreational facilities within reasonable walking distance of the project site as well as being accessible by biking and public transit. Nearby public parks, within one mile of the project site include DeTruk Round Park, DeMeo Park, Railroad Depot Park, and Prince Memorial Greenway (see Attachment 14, Figure 4.11-2).</td>
</tr>
<tr>
<td></td>
<td>In June 2019, the City’s Zoning Administrator approved a Minor Conditional Use Permit for an 80% Supplemental Density Bonus and a Design Review application for the proposed project. As part of these approvals, the City</td>
</tr>
</tbody>
</table>
required the following condition related to park development fees (see Attachment 19):

- Parks acquisition and/or park development fees shall be paid at the time of building permit issuance. The fee amount shall be determined by the resolution in effect at the time.

In addition, the project also includes an interior courtyard area with various amenities for tenants and guests, which has the potential to offset some of the project’s demand on existing recreational facilities in the area.

As discussed in the DSASP EIR, an increase in population under the Specific Plan could have the potential to increase the demand on recreational facilities serving the Specific Plan Area. Although implementation of the DSASP would have the potential to increase the use of recreational facilities, existing and proposed policies and regulations would ensure that new development and the City provide adequate new recreational opportunities to avoid overusing existing facilities (see Attachment 14, pg. 4.11-36). The proposed project is within the planned growth anticipated in the DSASP and would be adequately served by existing and planned recreation facilities in the City.

It is not anticipated that the project’s increase in demand for recreational facilities would result in substantial deterioration of existing facilities or require new or expanded facilities onsite. As such, this project would not have adverse impacts to any parks, recreational facilities or usable open space in the City.

Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library

<table>
<thead>
<tr>
<th>Transportation and Accessibility</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed project includes a residential building with 54 apartments, 53 of which would be studios for formerly homeless individuals and the remaining unit would be a one-bedroom apartment for an on-site manager. The building would also include offices, therapy rooms, resident amenities, and a 24/7 security office. The proposed building would be three stories, primarily facing College Avenue. The project would require five fulltime staff, including the on-site manager, as well as two part-time staff. The one-acre project site has frontage on College Avenue to the north and Cleveland Avenue to the east. It is bounded on</td>
<td></td>
</tr>
</tbody>
</table>
the west by the SMART rail line and multi-use pathway right-of-way and on the south by several commercial uses. The site would be accessed through a new 20-foot wide driveway onto Cleveland Avenue to be located 30 feet south of the curb return at the Cleveland Avenue/College Avenue intersection. Regional access includes US Highway 101, located approximately 700 feet to the east.

As shown on the Architectural Plans (see Figure 4 – Architectural Plans), the closest intersection that would receive traffic from the project is College Avenue/Cleveland Avenue, immediately to the northeast of the project site.

**Trip Generation**

W-Trans conducted a Focused Traffic Study (dated June 24, 2019) for the proposed project (see Attachment 39). The anticipated trip generation for the proposed project was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual, 10th Edition, 2017* for "Multifamily Housing (Mid-Rise)" (ITE LU #221). The resulting trip generation estimates are shown in Table 3.

<table>
<thead>
<tr>
<th>Proposed Uses</th>
<th>Daily Trips</th>
<th>AM Peak</th>
<th>PM Peak</th>
</tr>
</thead>
<tbody>
<tr>
<td>54 Apartment Units</td>
<td>294</td>
<td>19</td>
<td>24</td>
</tr>
</tbody>
</table>

The City’s Standard Guidance for the Preparation of Traffic Impact Analysis requires a traffic impact analysis when a project generates 50 or more trips during either peak hour; as indicated above, the estimated trips from this project would be well below this threshold. However, the City’s draft update of this guidance would establish an additional threshold of 250 daily trips to require a full operational analysis. Since the 294 daily trips was based on the application of standard apartment rates to studio units that would house inhabitants who, in general, may not own vehicles, the daily trip generation could reasonably be expected to be less than 250 trip ends. Therefore, a full traffic study was not performed for the proposed project (see Attachment 39, pgs. 1).

In June 2019, the City’s Zoning Administrator approved a Minor Conditional Use Permit for an 80% Supplemental
Density Bonus and a Design Review application for the proposed project. As part of these approvals, the City made the following findings (see Attachment 19):

- The proposed development will not be detrimental to the public health, safety, or welfare or materially injurious to the properties or improvements in the vicinity in that the supportive housing use is a permitted use, and a focused traffic study prepared by a licensed professional engineer indicates negligible impact on existing traffic conditions and the Project has been reviewed and Conditioned appropriately by City Staff.

Parking

As proposed, the project would provide 11 parking spaces onsite. The population that will be eligible for the housing units constructed as part of this project are likely to have relatively low rates of vehicle ownership, and the spaces are anticipated to primarily serve staff and visitors. There will be approximately five full-time and two part-time employees at the site. Section 65654 of the California Government Code states that "(i) If the supportive housing development is located within one-half mile of a public transit stop, the local government shall not impose any minimum parking requirements for the units occupied by supportive housing residents." As indicated above, CityBus Routes 9 and 10 offer transit service seven days a week and can be accessed at stops well under one-half mile from the project site. Additional routes are accessible at stops that are just over one-half mile from the site. As such, the onsite parking supply would be adequate as defined by state law (see Attachment 39, pgs. 4).

Pedestrian Facilities

Pedestrian facilities consist mostly of sidewalks along the streets in the immediate vicinity of the project site. Sidewalks would be reconstructed along the College Avenue frontage and the western side of Cleveland Avenue. Sidewalks and marked crosswalks are present along College Avenue through the College Avenue/US 101 interchange. The adjacent Quonset hut structure to the south of the project site extends to the curb, preventing pedestrian connectivity on the west side of Cleveland Avenue. There
are sidewalks on the east side of Cleveland Avenue that have signposts and utility poles, which partially obstruct pedestrian path of travel.

The sidewalks along the project frontages on College Avenue and Cleveland Avenue would be adequate with completion of the proposed sidewalk improvements. Pedestrian access would continue to be discontinuous south of the project site; however pedestrian access to the south is provided by the SMART multi-use pathway located immediately adjacent to the project’s western boundary, connecting the project site to Railroad Square and other nearby downtown destinations (see Attachment 39, pg. 2). As such, the existing and proposed pedestrian facilities will be adequate for the proposed project.

Bicycle Facilities

Existing bicycle facilities would provide access for project residents to numerous destinations within one mile of the project site. As noted above, the SMART multi-use pathway provides access to two rail stations. There are bike lanes on College Avenue east of the site, extending from Cleveland Avenue to Morgan Street, facilitating bicycling through the US 101 interchange. There are also bike lanes on Dutton Avenue between College Avenue and Guerneville Road, which also has bike lanes.

The project proposal includes a separated bikeway at the same grade as the sidewalk for eastbound bicyclists along the western half of the project frontage on College Avenue. The proposed separated bikeway would be five feet wide and would be located between the roadway and a five-foot sidewalk. Though the Caltrans Design Information Bulletin (DIB-89) recommends that a separated bikeway at the same grade as the sidewalk should be a minimum of 1.5 feet from the street including the curb width, the facility as proposed would be continuous to the curb. The project proposes to provide a covered bicycle parking area to accommodate 56 bicycles, which is more than four times the number required by the Santa Rosa City Code (see Attachment 39, pgs. 2-3). As such, existing and proposed bicycle facilities will be adequate for the proposed project.
Transit

Several transit agencies provide service to the project area, serving both local and regional destinations.

Santa Rosa CityBus provides fixed route bus service in the City of Santa Rosa. Route 9 is a loop that travels eastbound near the project site, connecting to the downtown transit center. There is an existing bus stop across the street from the project site on the southeast corner of the College Avenue/Cleveland Avenue intersection. Route 9 operates from 6 a.m. until 8 p.m. on 30-minute headways during the week, with hourly service on Saturday and limited Sunday service. Route 10 connects to the downtown transit center as well as Coddington Mall and north Santa Rosa, with similar hours of operation to Route 9. There are southbound stops for Route 10 at Carillo Street and 11th Street, approximately 500 feet from the project site; there is a northbound stop at 10th Street, about 900 feet from the project site. Route 19, the North Circulator, serves destinations including Coddington Mall and the Finley Community Center, running six buses per day on weekdays. Route 19 bus stops are less than one-half mile from the project site (see Attachment 39, pg. 3).

Sonoma County Transit operates numerous routes in the vicinity of the project. Routes 20, 29A, 30, 44, 48, 60, 62, and 54 operate along Mendocino Avenue, approximately one-half mile from the project site. These routes provide service to locations including Petaluma, Rohnert Park, North Santa Rosa, and the Sonoma Coast (see Attachment 39, pg. 4).

Regional transit service is also available. SMART offers regional rail service between the Charles M. Shulz-Sonoma County Airport and San Rafael. The project site is located approximately one mile from both the Santa Rosa Downtown and North Santa Rosa SMART stations. Mendocino Transit and Amtrak provide regional connections from a stop at the intersection of Cleveland Avenue/Edwards Avenue, less than one mile from the project site (see Attachment 39, pg. 4).

Dial-a-ride, also known as paratransit, or door-to-door service, is available for those who are unable to independently use the transit system due to a physical or mental disability. CityBus paratransit is contracted out to
MV Transportation and is designed to serve the needs of individuals with disabilities within three-quarters of a mile from existing CityBus routes (see Attachment 39, pg. 4).

As such, transit service providing access to and from the project site is adequate.

Sight Distance

Sight distance along Cleveland Avenue at the location of the proposed driveway was evaluated based on stopping sight distance criteria in the Highway Design Manual published by Caltrans. The posted speed limit on Cleveland Avenue is 30 mph, and for a design speed of 30 mph the minimum stopping sight distance is 200 feet.

Visibility for drivers exiting the project driveway would be very limited due to the presence of a building (Quonset hut) that extends to the street. It was not possible to evaluate the sight distance from the appropriate location due to the presence of a chain link fence along the edge of the property. Using Google Earth, stopping sight distance was estimated to be approximately 45 feet, much less than the minimum. Due to the insufficient visibility, it is recommended that the exiting vehicles be limited to right turns only. Due to the proximity of the driveway to the intersection, northbound vehicles on Cleveland Avenue would have limited visibility of westbound vehicles on College Avenue turning left onto Cleveland Avenue. Therefore, northbound vehicles should be prohibited from turning left from Cleveland Avenue into the project site. A barrier such as delineators or a curb should be used to prevent left turns (see Attachment 39, pgs. 4-5).

To minimize potential traffic safety impacts from limited sight distance at the proposed project driveway off of Cleveland Avenue, the City conditioned the Design Review approval for the proposed project (Application No. DR19-038) to restrict left turns into and out of the site and require the installation of a traffic median along the project frontage on Cleveland Avenue (see Attachment 19). These measures have been included as mitigation for the proposed project.
Conclusion

The applicant proposes to develop an affordable housing project along College Avenue near pedestrian, bicycle, and transit facilities. It would provide housing in a growth area, Downtown Station Area, and facilitate alternative modes of transportation. Future residents would be within walking distance of shopping and employment and would have access to mass transportation, multi-use pathways, and services that would reduce vehicle trips and miles traveled.

Based on the estimated vehicle trips, this residential in-fill development project would not result in a deleterious level of service at nearby street intersections and would not result in a substantial or noticeable increase in traffic above planned levels. With the proposed mitigation measures to ensure adequate traffic safety, the proposed project would not result in any adverse impacts related to transportation and accessibility.

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>NATURAL FEATURES</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unique Natural Features, Water Resources</td>
<td></td>
<td>Unique Natural Features</td>
</tr>
<tr>
<td></td>
<td></td>
<td>The project site is located along College Avenue in the City of Santa Rosa in an area containing a mixture of residential, commercial, and industrial uses. Historically, the project site contained several houses and commercial uses including a furniture warehouse, grocery store, and several restaurants. The buildings most recently located on the project site were demolished prior to March 2019 (see Attachment 29, pgs. 19-20).</td>
</tr>
<tr>
<td></td>
<td></td>
<td>The project site is relatively flat (&lt;1% slope) and situated at an elevation of approximately 148 feet above sea level. The project site does not contain unique natural features or existing farmland, and the proposed project would not convert existing farmland uses. As discussed in the section entitled ‘Endangered Species,’ the project site does not contain sensitive habitat, wetlands, riparian vegetation, gulches, or other natural areas (see Figure 2 - Project Area and Figure 3 – Photos of Project Site).</td>
</tr>
</tbody>
</table>
Therefore, the proposed project would not result in adverse impacts to any unique natural features.

**Water Resources**

As noted above under the section entitled ‘Water Supply’, the proposed project would be served by the SCWA, which has been determined to have adequate supply to serve the project. As noted above under the section entitled ‘Waste Water / Sanitary Sewers’, the proposed project would be served by the City’s wastewater collection system, which has been determined to contain adequate capacity to serve the project with the implementation of planned improvements and expansion of the wastewater treatment facilities.

Based on the 2008 (Panel 06097CO728E, eff. 12/2/2008) Flood Insurance Rate Map, the site is located in Zone X (see Figure 8 – FEMA Firm Map). The Zone X designation is defined as an Area of Minimal Flood Hazard. As such, the project area is not located in a FEMA designated Special Flood Hazard Area.

The project site is generally flat (<1% slope) and has recently been cleared of dilapidated commercial buildings and is now vacant. Grading and drainage improvements would occur in compliance with Santa Rosa City Code Chapters 19-64 (Grading and Erosion Control) and 17-12 (Storm Water) (see Attachment 20). Additionally, compliance with State and federal stormwater regulations (e.g., National Pollution Discharge Elimination System [NPDES]) is required during construction activity and long-term operation of the project.

Based on the project location, design, and compliance with existing regulatory requirements and conditions of approval, the proposed project would not result in any adverse impacts to water resources.

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library*

<table>
<thead>
<tr>
<th>Vegetation, Wildlife</th>
<th>3</th>
</tr>
</thead>
<tbody>
<tr>
<td>The project site is a vacant site along College Avenue in the City of Santa Rosa that is surrounded by urban development. Urban development surrounding the project site includes commercial and residential uses to the north, commercial and residential uses to the east, commercial</td>
<td></td>
</tr>
</tbody>
</table>
uses and the SMART rail line and multi-use pathway to the south, and commercial and industrial uses and the SMART rail line and multi-use pathway to the west. Vegetation on the site consists of two landscape trees and grasses. No sensitive habitat, wetlands, riparian vegetation, gulches, or other natural areas exist on the project site (see Figure 2 - Project Area and Figure 3 - Photos of Project Site).

The primary biological resources on the project site are landscape trees. The trees on the project site could provide nesting habitat for birds, including migratory birds and raptors. To prevent adverse impacts to nesting migratory and other protected bird species, the project applicant shall implement mitigation requiring pre-construction surveys for migratory and other protected bird species by a qualified professional.

As shown on the Architectural Plans (see Figure 4 – Architectural Plans), it is proposed to install landscaping around the proposed building. This new vegetation would improve the aesthetic appearance of the project area and may provide limited habitat for wildlife adapted to urban environments.

Based on the location, design, and compliance with existing regulatory requirements, conditions of approval, and mitigation measures, the proposed project would not result in any adverse impacts to vegetation and wildlife.

*Documentation can be found on the City’s website at the following address: https://srcity.org/804/Document-Library*

| Other Factors          | None.  |
Additional Studies Performed:


7. RGH Consultants. 2018. Geotechnical Study Report, College Station Shopping Center, 6 West College Avenue, Santa Rosa, California. March.


Field Inspection (Date and completed by):

- January 11, 2018; RGH Consultants
- January 7, 2019; Freshwater Environmental Services
- January 12 and 14, 2020; Frank Hubbard and Associates, Inc
- April 3, 2020; Alta Archaeological Consulting
- April 3, 2020; Painter Preservation
- June 7, 2020; SHN

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

Alta Archaeological Consulting
Dean Martorana, M.A., RPA
15 Third Street
Santa Rosa, CA 95401

Alta Archaeological Consulting
Sarah King-Narasimha, MPhil
15 Third Street
Santa Rosa, CA 95401
Bay Area Air Quality Management District (BAAQMD)
Planning Department

**Arena Flores**
375 Beale Street, Suite 600
San Francisco, CA 94105

Bay Area Air Quality Management District (BAAQMD)
Records Department

**Rochelle Henderson**
375 Beale Street, Suite 600
San Francisco, CA 94105

Bay Area Air Quality Management District (BAAQMD)
Engineering Department

**Xuna Cai**
375 Beale Street, Suite 600
San Francisco, CA 94105

California State Historic Preservation Officer
Office of Historic Preservation

**Julianne Polanco**
PO Box 942896
Sacramento, CA 94296-0001

California Engineering Company
**Dave Swartz, PE, PLS**
1110 Civic Center Blvd, Suite 404
Yuba City, CA 95993

California Engineering Company
**Anthony Hewitt, PE**
1110 Civic Center Blvd, Suite 404
Yuba City, CA 95993

City of Santa Rosa
Housing Program Specialist

**Frank Kasimov, MCP**
90 Santa Rosa Avenue
Santa Rosa, CA 95404

City of Santa Rosa
Housing and Community Services Manager

**Megan Basinger**
90 Santa Rosa Avenue
Santa Rosa, CA 95404
Danco Communities  
**Chris Dart**  
5251 Ericson Way  
Arcata, CA 95521

Danco Communities  
**McKenzie Dibble**  
5251 Ericson Way  
Arcata, CA 95521

Environmental Science Associates  
Director  
**Chris Easter**  
180 Grand Avenue, Suite 1050  
Oakland, CA 94612

Environmental Science Associates  
Senior Air Quality Associate  
**Cheri Velzy**  
180 Grand Avenue, Suite 1050  
Oakland, CA 94612

Frank Hubach Associates, Inc.  
**Frank J. Hubach**  
4905 Central Ave, Ste 100  
Richmond, CA 94804

Freshwater Environmental Services  
**Orrin Plocher**  
Sunny Brae Center  
Arcata, CA 95521

Freshwater Environmental Services  
**Stan Thiesen**  
Sunny Brae Center  
Arcata, CA 95521

Painter Preservation  
**Diane J. Painter**  
15 Third Street  
Santa Rosa, CA 95401

RGH Consultants  
Principal Geologist/Project Manager  
**Gary W. Russey**  
1305 North Dutton Avenue  
Santa Rosa, CA 95401
RGH Consultants
Principal Geotechnical Engineer
**Eric G. Chase**
1305 North Dutton Avenue
Santa Rosa, CA 95401

Rowell Brokaw
**Frank Visconti, AIA**
1203 Willamette, Suite 210
Eugene, Oregon 97401

Santa Rosa Fire Department
Administrative Technician
**Gwyn Buckheit**
2373 Circadian Way
Santa Rosa, CA 95407

SHN
Principal Planner
**Bob Brown, AICP**
1062 G Street, Suite I
Arcata, CA 95521

SHN
Senior Planner/Project Manager
**Garry Rees, AICP**
1062 G Street, Suite I
Arcata, CA 95521

SHN
Senior Certified Wildlife Biologist
**Gretchen O’Brien**
1062 G Street, Suite I
Arcata, CA 95521

U.S. Department of Housing and Urban Development
Environmental Engineer
**Nelson Rivera**
451 7th Street SW, Room 7248
Washington DC 20410

W-Trans
Principal
**Dalene J. Whitlock, PE, PTOE**
490 Mendocino Ave, Suite 201
Santa Rosa, CA 95401
Attachments
An electronic disc with copies of the following attachments are provided. These documents are also available for review at the City of San José Department of Planning, Building and Code Enforcement.


Attachment 13: City of Santa Rosa. 2007. *Excerpts from the Downtown Station Area Specific Plan.* October.

Attachment 14: City of Santa Rosa. 2007. *Excerpts from the Downtown Station Area Specific Plan Program Environmental Impact Report (PEIR).* SCH# 2006072104.


Attachment 29: Painter Preservation. 2020. Historic Resources Evaluation and Section 106 Review, Sage Commons, 6 & 80 College Avenue, Santa Rosa, Sonoma County, California. May.

Attachment 30: RGH Consultants. 2018. Geotechnical Study Report, College Station Shopping Center, 6 West College Avenue, Santa Rosa, California. March.


List of Permits Obtained:

The project site is zoned General Commercial (CG) with the Station Area (SA) combining district overlay and is located within the boundaries of the DSASP (see Attachment 22). The Specific Plan encourages a vibrant urban center, including a distinct identity and character, a diverse mix of uses, transient-oriented development, and pedestrian-friendly connections (see Attachment 13, pg. 3-1). In 2007, the City of Santa Rosa certified an Environmental Impact Report (EIR) for the Specific Plan (SCH# 2006072104).

On June 20, 2019, the City’s Zoning Administrator approved a Minor Conditional Use Permit for an 80% Supplemental Density Bonus for the proposed project. On June 27, 2019, the City’s Zoning Administrator approved a Design Review application for the proposed project. As part of these approvals, the City has determined that the proposed project, as designed and conditioned, is consistent with the General Plan, the DSASP, and the City Code (see Attachment 19). The one exception is compliance with the City’s off-street parking requirement. However, Government Code Section 65654 exempts all parking requirements for supportive housing within one-half mile of a public transit stop.

A merger of the three project site parcels (6 & 80 College Avenue/APNs 010-121-020, -024, -025) was approved by the Planning & Economic Development Director on April 14, 2020 (see Attachment 19). The address for the project site is now 80 College Avenue and the new parcel number has not yet been assigned by the Sonoma County Assessor’s Office.

Public Outreach [24 CFR 50.23 & 58.43]:

The City of Santa Rosa, as the Responsible Entity under NEPA, will comply with the following requirements for public outreach:

- Public noticing shall be published in an appropriate local printed news medium and sent to individuals and groups known to be interested in the proposed action, concerning the availability for review of the Environmental Assessment (EA) completed for the proposed project (24 CFR 50.23).

- Publishing of the Finding of No Significant Impact (FONSI) and observance of the corresponding comment periods (24 CFR 58.43).
**Cumulative Impact Analysis** [24 CFR 58.32]:

The proposed project is not part of a series of activities. The project would not result in additional cumulative impacts from future related actions.

**Alternatives** [24 CFR 58.40(e); 40 CFR 1508.9]

**Offsite Alternative:**

An alternative to the proposed project is to site the affordable housing at another location. However, the proposed project site is superior to other sites because: 1) the applicant already owns the property; 2) the site is zoned to allow multi-family housing; and 3) the project involves the development of a vacant site, which is within walking distance of employment, shopping, transit facilities, and pedestrian-bicycle pathways.

**No Action Alternative** [24 CFR 58.40(e)]:

The no action alternative would mean the property would remain in a vacant condition. Left in its current condition, the site would remain underutilized and dilapidated and would result in blight. Thus, the no action alternative would have an adverse impact on the environment. However, the no action alternative would not result in construction activities and would avoid the potential significant impacts of the project. Under this alternative, the City of Santa Rosa would lose the opportunity to provide permanent supportive housing for formerly homeless tenants in the City.

Given the current property values in the City, it is likely that another proposal to develop the site would be put forth. Any subsequent development would have to undergo separate environmental review, but the temporary construction impacts would be similar to the proposed project. Subsequent development may also result in market rate residential units, thereby eliminating the opportunity for supportive housing at this site.

**Summary of Findings and Conclusions:**

For several environmental issues, the project would result in minor adverse but mitigable impacts. No impacts are potentially significant to the extent that an Environmental Impact Statement would be required.
Mitigation Measures and Conditions [40 CFR 1505.2(c)]
Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Air Quality mitigation measures:

1) To reduce fugitive dust generation during construction and minimize impacts to nearby sensitive receptors, the following dust control measures shall be implemented during all phases of construction:

   - Cover all trucks hauling construction and demolition debris from the site.
   - Water on a continuous as-needed basis all earth surfaces during clearing, grading, earthmoving, and other site preparation activities.
   - Use watering to control dust generation during demolition of structures or break-up of pavement.
   - Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved parking areas and staging areas.
   - Sweep daily (with water sweepers) all paved areas and staging areas.
   - Provide daily clean-up of mud and dirt carried onto paved streets from the site.
   - Install wheel washers for all exiting trucks, or wash off the tires or tracks of trucks and equipment leaving the site.
   - Suspend dust-producing activities during periods when instantaneous gusts exceed 25 mph when dust control measures are unable to avoid visible plumes.
   - Limit the area subject to excavation, grading and other construction or demolition activity at any one time.

2) To ensure the indoor air environment of the proposed studio units complies with the BAAQMD cumulative threshold for PM$_{2.5}$ concentrations, filters with a minimum efficiency reporting value of 13 (MERV-13) shall be used in the indoor air heating, ventilation, and air conditioning (HVAC) systems for the proposed apartment building.

Biological Resources mitigation measures:

1) To prevent adverse impacts to nesting migratory and other protected bird species, the project applicant shall implement the following mitigation measures:

   - A survey of subject trees for nesting raptors shall be conducted no more than 72 hours prior to tree removal activities. The survey must be conducted by a certified
ornithologist, licensed biologist, or licensed arborist. If the survey detects the presence of nesting raptors, tree removal activities must be placed on hold until a time determined by the licensed professional.

- A qualified wildlife biologist shall conduct pre-construction surveys. If an active bird nest is found, the bird shall be identified to species and the approximate distance from the closest work site to the next estimated. No additional measures will be implemented if active nests are more than the following distances from the nearest work site: (a) 300 feet for raptors; or (b) 75 feet for other non-special-status bird species. Disturbance of active nests shall be avoided to the extent possible until it is determined that nesting is complete, and the young have fledged.

**Explosive and Flammable Hazards mitigation measures:**

1) To ensure the project complies with the ASD from the Suburban Propane and BoDean Asphalt Plant facilities, the applicant proposes to construct a blast mitigation barrier (i.e., wall) along the western and southwestern property lines of the project site, which faces these facilities. Based on information from the applicant’s engineer (California Engineering Company), the blast mitigation barrier is proposed to meet the following specifications:

- **Material** = concrete masonry unit (CMU) blocks
- **Height** = 6 feet
- **Footings** = 36 inches in depth
- **Length** = entire length of western property line bordering the SMART rail line and multi-use pathway and a portion of the southwestern property line bordering 1005 Cleveland Avenue (APN 010-121-026)
- **Width** = 6 inches
- **Grouting** = 16 inches on-center

The blast mitigation barrier design plans shall be prepared and stamped/sealed by a licensed engineer. The blast mitigation barrier shall be designed to withstand the peak positive incident pressure (blast overpressure) from the above ground storage tanks at the Suburban Propane and BoDean Asphalt Plant facilities. The blast mitigation barrier shall be designed and constructed pursuant to all relevant codes and regulations (e.g., HUD Barrier Design Guidance, American Society of Civil Engineers, California Building Code, etc.).

**Historic and Cultural Resources mitigation measures:**

1) Due to the potential to discover unknown cultural and historic archaeological resources during site preparation and construction, the following mitigation will be implemented to minimize potential impacts to cultural and historic resources:

- **Unanticipated Discovery of Cultural Resources.** If previously unidentified cultural resources are encountered during project implementation, avoid altering the materials and their stratigraphic context. A qualified professional archaeologist should be contacted to evaluate the situation. Project personnel should not collect cultural resources. Prehistoric resources include, but are not limited to, chert or obsidian...
flakes, projectile points, mortars, pestles, and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources include stone or abode foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies.

In the event of an inadvertent discovery of possible archaeological material will be consistent with 36 CFR 800.13. Should a cultural resource discovery occur during subsurface exploration or during construction, all work immediately within a 50-foot vicinity of the find shall cease. The area will be secured and protected. Construction personnel will immediately notify the qualified professional archaeologist assigned to the job and the Lead Inspector. Moreover, Native American consultation will occur if prehistoric-era Native American cultural resources are discovered.

The qualified professional archaeologist will make an evaluation of NRHP/CRHR eligibility in the field in accordance with generally accepted research themes and methods. No ground disturbing activities may resume until the qualified professional archaeologist is on site, is able to assess the situation, and has provided professional recommendations.

Identified resources will be evaluated for listing on the NRHP per the four criteria established in 36 CFR 60.4: Criteria for evaluation and for listing on the CRHR per Sections 15064.5 (b), 21083.2, and 21084.1 of the Public Resource Code (PRC) and the CEQA Guidelines (California Code of Regulations Title 14, Section 15064.5). If the resource is determined potentially eligible for inclusion on the NRHR and/or the CRHR, the qualified professional archaeologist will notify the City of Santa Rosa.

- **Encountering Native American Remains.** Although unlikely, if human remains are encountered, all work must stop in the immediate vicinity, including a stop work radius of 100 feet around the discovered remains. The Sonoma County Coroner and a qualified professional archaeologist must be notified immediately so that an evaluation can be performed. If the remains are deemed to be Native American and prehistoric, the Native American Heritage Commission must be contacted by the Coroner so that a “Most Likely Descendant” can be designated and further recommendations regarding treatment of the remains is provided.

  Procedures to follow in the event that human remains are encountered the discovery. The Lead Agency is responsible for ensuring proper treatment of the remains that comply with Public Resources Code Sections 5097.98 and 5097.99; Section 7050.5 of the California Health and Safety Code, as amended by Assembly Bill 2641. The area around the discovery will be secured and the remains will be left where they were found and not be disturbed in any way. Project personnel will treat the remains with respect. Construction can proceed only after the proper archaeological inspections have occurred and environmental clearances are obtained. This will require close coordination with the Native American Heritage Commission, City of Santa Rosa, Construction personnel, qualified professional archaeologist and local Native American tribes.
Noise mitigation measures:

1) To minimize noise generated during construction activity, the following limitations on construction activity shall be required for the proposed project:

- Construction hours shall be limited to 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. Saturdays.
- No construction is permitted on Sundays and holidays.

2) To reduce noise from construction equipment, when applicable, the following measures will be required during construction activity:

- Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment.
- Utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- Locate stationary noise-generating equipment as far as feasible from sensitive receptors when sensitive receptors adjoin or are near a construction project area.
- Prohibit unnecessary idling of internal combustion engines.
- Pre-drill foundation pile holes to minimize the number of impacts required to seat the pile.
- Construct solid plywood fences around construction sites adjacent to operational business, residences or noise-sensitive land uses.
- A temporary noise control blanket barrier shall be erected, if necessary, along building facades facing construction sites.
- This mitigation would only be necessary if conflicts occurred which were irresolvable by proper scheduling. Noise control blanket barriers can be rented and quickly erected.
- Route construction-related traffic along major roadways and as far as feasible from sensitive receptors.
- Ensure that construction activities (including the loading and unloading of materials and truck movements) are limited to the hours of 7:00 a.m. to 7:00 p.m.
- Businesses, residences or noise-sensitive land uses adjacent to construction sites shall be notified of the construction schedule in writing. Designate a "construction liaison" that will be responsible for responding to any local complaints about construction noise. The liaison would determine the cause of the noise complaints and institute reasonable measures to correct the problem. Conspicuously post a telephone number for the liaison at the construction site.

Transportation mitigation measures:

1) To minimize potential traffic safety impacts from limited sight distance at the proposed project driveway off of Cleveland Avenue, the following traffic restrictions and improvements shall be implemented:
- Project site driveway shall be striped for right-ingress and right-egress only.
- Applicant shall install a six-inch wide traffic median along the frontage on Cleveland Avenue to the satisfaction of the City Traffic Engineer.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Downtown Station Area Specific Plan EIR Mitigation Measure AQ-1</td>
<td>The Downtown Station Area Specific Plan (DSASP) EIR includes Mitigation Measure AQ-1, which requires the implementation of various dust control measures during construction activity to minimize impacts to sensitive receptors. Consistent with the DSASP EIR, the dust control measures in Mitigation Measure AQ-1 have been included as mitigation for the project to reduce the generation of fugitive dust emissions during construction activity.</td>
</tr>
<tr>
<td>40 CFR Part 93, Executive Order 12898, Downtown Station Area Specific Plan EIR Mitigation Measure AQ-3, and BAAQMD Receptor Thresholds</td>
<td>The Downtown Station Area Specific Plan (DSASP) EIR includes Mitigation Measure AQ-3, which requires detailed evaluation to identify site specific health risks associated with particulate matter emitted from transportation and stationary sources. A Health Risk Assessment was prepared for the proposed project that concluded the BAAQMD cumulative threshold for PM$<em>{2.5}$ concentrations would be exceeded at the project site. To ensure that the indoor air environment of the studio units meets the BAAQMD cumulative threshold for PM$</em>{2.5}$ concentrations, filters with a minimum efficiency reporting value of 13 (MERV-13) shall be used in the indoor air heating, ventilation, and air conditioning (HVAC) systems for the proposed apartment building.</td>
</tr>
<tr>
<td>Migratory Bird Treaty Act, California Fish and Game Code Section 3503, 3503.5, and 2800, and Conditions of Approval for Design Review Approval (Application No. DR19-038)</td>
<td>The trees on the project site could provide nesting habitat for birds, including migratory birds and raptors. To prevent adverse impacts to nesting migratory and other protected bird species, the City conditioned the Design Review approval for the proposed project (Application No. DR19-038) to require pre-construction surveys for migratory and other protected bird species by a qualified professional. These measures have been included as mitigation for the proposed project.</td>
</tr>
<tr>
<td>HUD regulations at 24 CFR Part 51 Subpart C</td>
<td>To ensure the project complies with the ASD from the Suburban Propane and BoDean Asphalt Plant facilities, the applicant proposes to construct a blast mitigation barrier (i.e., wall) along the western and southwestern property lines of the project site, which faces these...</td>
</tr>
</tbody>
</table>
facilities. The requirement to construct the blast mitigation barrier according to the criteria provided by HUD, has been included as mitigation for the proposed project.

<table>
<thead>
<tr>
<th>Section 106 of the National Historic Preservation Act (36 CFR 800) and the California Environmental Quality Act (Section 15064.5)</th>
<th>Due to the potential for discovering cultural archaeological and historic resources during site preparation and construction activities, the project applicant and contractor shall comply with the inadvertent discovery protocol required as mitigation for the project to prevent potential impacts to cultural archaeological and historic resources.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conditions of Approval for Design Review Application No. DR-19-038</td>
<td>To minimize noise generated during construction activity, the City conditioned the Design Review approval for the proposed project (Application No. DR19-038) to require limitations on the day and hours of construction activity and the implementation of several measures to reduce noise from construction equipment. These measures have been included as mitigation for the proposed project.</td>
</tr>
<tr>
<td>Conditions of Approval for Design Review Approval (Application No. DR19-038)</td>
<td>To minimize potential traffic safety impacts from limited sight distance at the proposed project driveway off of Cleveland Avenue, the City conditioned the Design Review approval for the proposed project (Application No. DR19-038) to restrict left turns into and out of the site and require the installation of a traffic median along the project frontage on Cleveland Avenue. These measures have been included as mitigation for the proposed project.</td>
</tr>
</tbody>
</table>
Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature: Garry Rees Date: 7/15/20
Name/Title/Organization: Garry Rees, Senior Planner, SHN
Certifying Officer Signature: Clare Hartman Date: 7/20/20
Name/Title: Clare Hartman, Deputy Director of Planning and Economic Development

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).