SANTA ROSA GENERAL PLAN 2035
Final Environmental Impact Report

Prepared for
City of Santa Rosa

June 2009
# TABLE OF CONTENTS

Santa Rosa General Plan 2035  
Final Environmental Impact Report

<table>
<thead>
<tr>
<th></th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Introduction</td>
<td>1-1</td>
</tr>
<tr>
<td>A. CEQA Process</td>
<td>1-1</td>
</tr>
<tr>
<td>B. Method of Organization</td>
<td>1-1</td>
</tr>
<tr>
<td>2. Revisions to the Draft EIR</td>
<td>2-1</td>
</tr>
<tr>
<td>A. Staff-Initiated Changes to the Draft EIR</td>
<td>2-1</td>
</tr>
<tr>
<td>B. Changes to the Draft EIR in Response to Comments</td>
<td>2-9</td>
</tr>
<tr>
<td>3. Agencies and Persons Commenting on the Draft EIR</td>
<td>3-1</td>
</tr>
<tr>
<td>A. Agencies and Persons Commenting in Writing</td>
<td>3-1</td>
</tr>
<tr>
<td>B. Commenters at the Public Hearings</td>
<td>3-2</td>
</tr>
<tr>
<td>4. Written Comments on the Draft EIR and Responses to Comments</td>
<td>4-1</td>
</tr>
<tr>
<td>Letter 1. Department of Fish and Game (Charles Armor, Regional Manager)</td>
<td>4-2</td>
</tr>
<tr>
<td>Letter 2. Department of Transportation (Lisa Carboni, District Branch Chief)</td>
<td>4-6</td>
</tr>
<tr>
<td>Letter 3. Sonoma County (Yolanda G. Solano, Comprehensive Planning)</td>
<td>4-10</td>
</tr>
<tr>
<td>Letter 4. Santa Rosa’s Historic Railroad Square (Lynda T. Angell, President)</td>
<td>4-16</td>
</tr>
<tr>
<td>Letter 5. Tomaras and Ogas, LLP (Brenda L. Tomaras)</td>
<td>4-21</td>
</tr>
<tr>
<td>Letter 6. West End Neighborhood Association (Lea M. Barron-Thomas, President)</td>
<td>4-25</td>
</tr>
<tr>
<td>Letter 7. Donna Strom</td>
<td>4-39</td>
</tr>
<tr>
<td>Letter 8. Sonoma County Water Agency (Renee T. Webber, Division Manager, Environmental Resources and Public Affairs)</td>
<td>4-41</td>
</tr>
<tr>
<td>5. Responses to Comments at the Planning Commission Public Hearings on the Draft EIR</td>
<td>5-1</td>
</tr>
<tr>
<td>A. Environmental Topics Raised and Responses to Comments from April 2, 2009 Hearing</td>
<td>5-1</td>
</tr>
<tr>
<td>B. Environmental Topics Raised and Responses to Comments from April 23, 2009 Hearing</td>
<td>5-3</td>
</tr>
<tr>
<td>6. Mitigation Monitoring and Reporting Program</td>
<td>6-1</td>
</tr>
</tbody>
</table>
CHAPTER 1
Introduction

A. CEQA Process

On March 9, 2009 the City of Santa Rosa (Lead Agency) released for public review a Draft Environmental Impact Report (Draft EIR or DEIR) for the Santa Rosa General Plan 2035 (SCH# 2008092114). The 45-day public review and comment period on the Draft EIR began on March 9, 2009 and closed at 5:00 p.m. on April 23, 2009.

The Draft EIR for the proposed Santa Rosa General Plan 2035 (General Plan 2035), together with this Response to Comments Document, constitute the Final EIR for the proposed project. The Final EIR is an informational document prepared by the Lead Agency that must be considered by decision-makers before approving the proposed project (CEQA Guidelines, Section 15090). California Environmental Quality Act (CEQA) Guidelines (Section 15132) specify the following:

“The Final EIR shall consist of:

(a) The Draft EIR or a revision of that draft.

(b) Comments and recommendations received on the Draft EIR either verbatim or in a summary.

(c) A list of persons, organizations, and public agencies commenting on the Draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in review and consultation process.

(e) Any other information added by the Lead Agency.”

This document has been prepared pursuant to CEQA and in conformance with the CEQA Guidelines. This Response to Comments Document incorporates comments from public agencies and the general public, and contains appropriate responses by the Lead Agency to those comments.

B. Method of Organization

This EIR Response to Comments document for the proposed General Plan 2035 contains information in response to comments raised during the public comment period.
This chapter, Introduction, describes the CEQA process and the organization of this Response to Comments Document.

Chapter 2, Revisions to the Draft EIR, contains an errata identifying text changes to the Draft EIR. Some changes were made by the City; others were made in response to comments received on the Draft EIR.

Chapter 3, Agencies, Organizations and Individuals Commenting on the Draft EIR, lists all agencies, organizations, and persons that submitted written comments on the Draft EIR during the public review and comment period, and/or that commented verbally at the Planning Commission public hearings on the Draft EIR on April 2 and April 23, 2009. The list also indicates the receipt date of each written correspondence.

Chapter 4, Responses to Written Comments on the Draft EIR, contains comment letters received during the review and comment period (and within a reasonable timeframe after). The responses to the comments are provided following each letter.

Chapter 5, Responses to Comments Received at the Planning Commission Public Hearings on the Draft EIR, contains a summary of all environmental topics raised regarding the Draft EIR at Planning Commission public hearings on April 2 and April 23, 2009 and responses to those comments.

Chapter 6, Mitigation Monitoring and Reporting Program, describes the identified mitigation measures and the responsible parties, tasks, and schedule for monitoring mitigation compliance.
CHAPTER 2
Revisions to the Draft EIR

The following revisions are made to the Draft EIR and incorporated as part of the Final EIR. Revised or new language is underlined. Deleted language is indicated by strikethrough text.

The revisions in this chapter do not identify any new significant impacts not identified in the Draft EIR, nor do they reveal a substantial increase in the severity of an environmental impact. The revisions further do not describe an alternative or mitigation measure considerably different from those identified in the Draft EIR. Accordingly, the revisions in this chapter are not considered “significant new information,” and the EIR need not be recirculated for public comment prior to certification (CEQA Guidelines Section 15088.5).

Section A identifies staff-initiated changes made to the Draft EIR. Section B identifies changes made to the EIR in response to comments received.

A. Staff-Initiated Changes to the Draft EIR

The text changes presented in this section are initiated by Lead Agency staff. Changes include text corrections to the Draft EIR to clarify or amplify the information presented in the Draft EIR, as well as corrections to certain wording in the Draft EIR. None of the revisions results in fundamental alterations of the conclusions of the Draft EIR.

The draft revision to the Bicycle and Pedestrian Master Plan (BPMP) is not covered in this EIR. Subsequent to the publication of the Draft EIR, the BPMP process revealed the need for further public workshops and modifications. The BPMP will undergo separate environmental review in accordance with the CEQA guidelines once it is published. The following text related to the BPMP has been deleted from or edited as follows in the Draft EIR:

The following text has been edited on page 3-15 (last bullet in list):

• Bicycle and Pedestrian Master Plan
The following text has been deleted on page 3-17 (first paragraph and title):

**Bicycle and Pedestrian Master Plan**

In 1994, the City Council approved the city’s Bicycle Master Plan, which included a planned 154-mile bicycle network. The plan was updated in 2001 and focused on two prime areas: identification and implementation of a comprehensive bicycle and pedestrian network to provide alternative transportation, and continuation of the city’s eligibility for obtaining bikeway grant funds. An update of the 2001 Bicycle and Pedestrian Master Plan is ongoing and is covered by this environmental document. Key topics and issues addressed in the draft plan include: analysis of existing bikeways, recommendations for new bikeways, bicycle and pedestrian accident analysis, bicycle education and safety programs, and bicycle parking. The proposed bikeway network consists of bike paths, lanes, boulevards, and routes.

The following text has been edited on page 4.C-15 (last paragraph):

An updated Bicycle and Pedestrian Master Plan is scheduled to be published in 2009 in draft form. Key topics and issues that will be addressed in the draft plan include: analysis of existing bikeways, recommendations for new bikeways, bicycle and pedestrian accident analysis, bicycle education and safety programs, and bicycle parking. The proposed bikeway network includes bike paths, lanes, boulevards, and routes. In addition, the plan identifies areas where pedestrian improvements, such as sidewalk connection segments, could be constructed.

The following text has been edited on page 4.C-25 (fifth paragraph):

Implementation of the Bicycle and Pedestrian Master Plan and the policy provisions of the proposed General Plan 2035 would provide for continued and improved pedestrian and bicycle opportunities and would reduce potential impacts to bicycle and pedestrian facilities to a less than significant level.

The following text has been edited on page 4.C-10 (second paragraph, second sentence):

The city currently has approximately 70 miles of bicycle facilities, including 12 miles of Class I off-street bicycle paths (paved routes not on a street or roadway and expressly reserved for non-motorized vehicles, bikes). Some City of Santa Rosa bike paths also serve pedestrians, skateboarders, etc.

---
The following text has been added on page 4.C-12 (second bullet point):

- **Intercity Bus Line.** Greyhound Lines provides intercity bus service to Santa Rosa, with a once-daily trip in each direction between San Francisco and Arcata along US 101. All Greyhound lines serve the terminal located at 3345 Santa Rosa Avenue near East Robles Avenue, at the Days Inn. Connections can be made in San Francisco for points east and south. Additionally, Amtrak California provides five pick up and drop off times from the Courtyard by Marriott (175 Railroad Street) for connections to intercity rail service at Martinez for points east, south, and west.

The graphic on page 4.C-13 has been edited:

**Figure 4.C-3 Transit Services,** Santa Rosa CityBus. The CityBus transit map now includes Route 19 which provides service from the Downtown Transit Mall south along Santa Rosa Avenue and west on Hearn to the Southside Transfer Center and back.

The following text has been added to Policy T-A-5 on page 4.C-17:

*T-A-5: Support tourist rail excursions on the Northwestern Pacific Railroad as well as rail service for commuting and other travel purposes.*

The following text has been edited on page 4.C-23 (first paragraph, last sentence):

It also includes proposed new bikeways and trails that would connect with existing bikeways and trails and provide new facilities to accommodate this increased demand.

The following text has been edited on page 4.C-25 (first paragraph, third sentence):

The proposed bikeway network includes bike paths, lanes, boulevards, and routes.

The following text has been edited on page 4.C-25 (third paragraph):

Under project-specific environmental review, specific projects would be investigated for overall feasibility (i.e., right-of-way constraints) and mitigation would be implemented as necessary, or that the bicycle or pedestrian project as proposed not feasible and it will be removed from the project list from any future consideration.
The following General Plan 2035 policies have been added to the list on page 4.D-27:

**LUL-E-6:** Allow residential or mixed use development in the Retail and Business Services or Office designations.

**LUL-F-1:** Do not allow development at less than the minimum density prescribed by each residential land use classification.

**LUL-F-2:** Require development at the mid-point or higher of the density range in the Medium and Medium High Density Residential categories. Allow exceptions where topography, parcel configuration, heritage trees, historic preservation or utility constraints make the mid-point impossible to achieve.

**LUL-F-4:** Allow development on sites with a Medium Density Residential designation to have a maximum density of 24 units per gross acre (and up to 30 units per acre provided at least 20 percent of the housing units are affordable, as defined in the Housing Element), provided all of the following conditions are met:

- At least half of the site is within one-quarter mile of a potential rail transit station, transit mall or transfer station, or Community Shopping Center;
- Direct pedestrian access, to the extent feasible, from the development to the transit facility or Community Shopping Center is provided;
- Development is not fenced or walled-off from the surroundings; and
- High level of pedestrian and bicycle orientation, evidenced through design review, is provided.

**LUL-G-1:** Develop the following areas as mixed use centers (see General Plan Land Use Diagram):

- **Community Shopping Centers:**
  - South of Hearn Avenue, at Dutton Meadow Avenue
  - West of Corporate Center Parkway, at Northpoint Parkway
  - Petaluma Hill Road, at Yolanda Avenue

**LUL-G-3:** Prepare and implement mixed-use zoning district(s) that provide development standards for mixed use sites and centers. District regulations should address:

- Minimum density and intensity requirements;
- Allowable uses;
- Building heights;
- Shared parking standards; and
- Prohibition of new auto-oriented and drive-through establishments.

**LUL-L-1:** Establish appropriate land use designations and development standards which will result in a substantial number of new housing units within walking distance of the downtown SMART station site.
**LUL-L-2:** Improve pedestrian, bicycle and bus transit connections from surrounding areas to the downtown SMART station site as well as between neighborhoods surrounding the SMART station site.

**LUL-L-3:** Create pedestrian friendly environments and provide convenient connections to the transit facility for all modes of transportation.

**LUL-M-1:** Coordinate with SMART to implement the regional pedestrian/bicycle trail along the rail right-of-way.

**LUL-M-2:** Require dedication of right-of-way for improvement and/or expansion of pedestrian and bicycle facilities where insufficient right-of-way currently exists.

**LUL-M-3:** Within the specific plan area, give priority to pedestrian and bicycle improvements in the Railroad Square and Railroad Corridor Sub-Areas to promote use of these travel modes by those living or working in closest proximity to the station site.

**H-C-9:** Provide opportunities for higher density and affordable housing development on regional/arterial streets and near the rail transit corridor for convenient access to bus and rail transit.

---

The following General Plan 2035 policies have been added to the list on page 4.D-38:

**H-G-1:** Maximize energy efficiency in residential areas. Utilize the following techniques: implement the Santa Rosa – Build It Green (SR-BIG) program; fund energy conservation through the Housing Authority’s rehabilitation loans; promote home improvement strategies for energy efficiency; and consider a program which would require energy efficiency improvements when a residential structure undergoes transfer of title or major renovation.

**H-G-2:** Promote energy efficiency through site planning and building design by assisting residential developers in identifying energy conservation and efficiency measures appropriate to the Santa Rosa area.

**H-G-3:** Promote energy efficiency in the provision and use of water in all residential developments.

**H-G-4:** Reduce the amount of water used and encourage the use of recycled water for landscaping.

**H-G-5:** Promote the use of fuel efficient heating and cooling equipment and other appliances.

**H-G-6:** Continue to fund energy conservation through the Housing Authority’s rehabilitation loans and develop programs to assist low income households and rental properties in meeting weatherization and energy conservation needs.
**H-G-7:** Work with organizations such as Solar Sonoma County to develop public-private partnerships supporting energy efficiency retrofit programs for existing residential structures.

**H-G-8:** Increase local energy awareness.

---

*The following text has been added on page 4.D-39:*

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

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

**Implementation Program for Mitigation Measure 4.D-5:** The City shall ensure regular review of progress toward the emission reduction targets established by the GHG Emission Reduction Action Plan and expand the program to reach the private citizens and businesses within the community. At present, the GHG Emission Reduction Action Plan is focused on municipal operations and needs to be expanded to the community at large. Report progress to the public and responsible officials, and revise the plan as appropriate. The City shall support implementation the GHG reductions through goals, incentives and public policy and designate staff to oversee the implementation of the reduction action plan. In addition, the following actions shall be required where feasible and are divided into ongoing actions and potential new actions:

**Ongoing Activities:**

- Development included in the General Plan 2035 will follow the adopted requirements and strategies of the City of Santa Rosa Build It Green (SR-BIG) and LEED Program.
• Within the green building programs, require orientation of buildings to maximize passive solar heating during cool seasons, avoid solar heat gain during hot periods, enhance natural ventilation, and promote effective use of daylight. Orientation should optimize opportunities for onsite solar generation.

• With consultation and direction from the city’s Green Building Advisory Council, consider providing permitting-related and other incentives for energy efficient building projects, such as giving the highest rated green projects priority in plan review, processing and field inspection services.

• Continue to conduct energy efficiency audits of existing municipal buildings (and develop a program for private structures) by checking, repairing, and readjusting heating, ventilation, air conditioning, lighting, water heating equipment, insulation and weatherization.

• Partner with community services agencies to fund energy efficiency projects, including heating, ventilation, air conditioning, lighting, water heating equipment, insulation and weatherization, for low income residents.

• Target local funds, including redevelopment and Community Development Block Grant resources, to assist affordable housing developers in incorporating energy efficient designs and features.

• Continue environmentally responsible government purchasing. Require or give preference to products that reduce or eliminate indirect greenhouse gas emissions, such as giving preference to recycled products over those made from virgin materials.

• Continue to improve and enhance the city’s water conservation program. The program may include, but not be limited to, providing financial incentives for implementing new technologies and high efficiency equipment, imposing restrictions on the time of watering, and requiring water efficient fixtures and irrigation equipment.

• Implement the city’s water-efficient landscape policy.

• Continue to provide individualized water audits to identify conservation opportunities. Continue to provide financial incentives for adopting identified efficiency measures.

• Continue to provide water audits for large landscape accounts. Continue to provide financial incentives for efficient irrigation controls and other efficiency measures.

• Continue to offer water efficiency training and certification for irrigation designers and installers, and property managers through the Qualified Water Efficient Landscaper certification training and other trainings as developed

• Implement or expand city or county-wide recycling and composting programs for residents and businesses.

• Continue methane recovery programs at wastewater treatment plants to generate electricity.
• Investigate Community Choice Aggregation (CCA) for renewable electricity generation.

• Provide public education and information about options for reducing greenhouse gas emissions through responsible purchasing, conservation, travel options, home efficiency upgrades and recycling.

• Continue to support a program to provide innovative, low-interest financing for energy efficiency and alternative energy projects. For example, allow property owners to pay for energy efficiency improvements and solar system installation through long-term assessments on individual property tax bills.

New Activities:

• Support incentives to encourage the use of energy efficient equipment and lighting.

• Consider adoption of a “heat island” mitigation plan that requires cool roofs, cool pavements, and strategically placed shade trees. Consider adoption of a program of building permit enforcement for re-roofing to ensure compliance with existing state building requirements for cool roofs on non-residential buildings.

• Consider strengthening and implementing local building codes for new construction and implement a program to renovate existing buildings to require a higher level of energy usage and water efficiency.

• Consider adoption of an energy and water efficiency retrofit ordinance that requires upgrades as a condition of issuing permits for renovations or additions, and on the sale of residences and buildings.

• Extend the types of recycling services offered (including food and green waste recycling).

• Preserve existing conservation areas (such as wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) that provide carbon sequestration benefits.

The following text has been edited on page 6-5 (last paragraph):

As noted below, in D. Significant and Unavoidable Environmental Impacts, implementation of the proposed General Plan 2035 in combination with potential development in the surrounding area would result in significant and unavoidable impacts related to transportation, air quality, water supply, and energy under cumulative conditions. These environmental topics areas are not easily quantifiable into the future because of new technology and progressive policy regulations. Santa Rosa, as outlined in the proposed General Plan 2035, would continue to provide policy framework to lessen cumulative impacts by encouraging smart growth within the Urban Growth Boundary.
B. Changes to the Draft EIR in Response to Comments

The text changes presented in this section were initiated by comments on the Draft EIR that were made at the two public hearings on the DEIR held on April 2 and April 23, 2009 and by written comments that were made during the 45-day public review period that began on March 9, 2009 and closed on April 23, 2009. None of the revisions results in fundamental alterations of the conclusions of the Draft EIR. The following text changes are revised as follows:

The following text has been edited on page 4.B-8 (last paragraph, second sentence):

As presented in the table, the city expects up to 30,420 additional jobs could be created by the buildout year, with a total of 128,400 new jobs in 2035.

[Planning Commission Chair Duggan]

The following text has been edited on page 4.C-6 (third paragraph, third sentence):

Walking and cycling each account for about a one to two percent share of commute trips.

[Planning Commission Chair Duggan]

The following text has been edited on page 4.C-22 (last paragraph, first sentence):

The 2007 U.S. Census American Community Survey estimates approximately one to two percent of Santa Rosa residents used a bicycle to commute to work and nearly three percent walk.

[Planning Commission Chair Duggan]

The following text has been edited on page 4.C-25 (third paragraph):

In addition, implementation of proposed Policy OSC-I-4 Mitigation Measure 4.D-4 would ensure appropriate land use compatibility and diesel particulate matter reduction and would reduce this impact to less than significant.

[Planning Commission Chair Duggan]
The following text has been added on page 4.C-28 (second paragraph, first sentence):

Implementation of the proposed Population growth consistent with General Plan 2035 projections would increase the amount of traffic on US 101 and other roadways, in the northbound and southbound directions. However, SR 12 would continue to operate within acceptable limits, except on the freeway-to-freeway connector ramps with US 101.

[Comment 3-1]

The following text has been revised on page 4.F-7 (second full paragraph, fifth line):

…California roach Clear Lake-Russian River roach (Hesperoleucus symmetricus),…

[Comment 8-15]

The following text has been revised on page 4.F-7 (second full paragraph, seventh line):

…fathead fathead minnow (Pimephales promelas),…

[Comment 8-16]

The following footnote has been added on page 4.F-7 (second full paragraph, second to last sentence):

Chinook salmon were recently observed in Santa Rosa Creek (City of Santa Rosa, 2007b). ¹

¹ Chinook salmon spawn in Santa Rosa Creek ephemerally. Spawning adults have been observed in years with early fall rain (e.g., 2002 and 2007). However, in years with later rainfall Chinook are unable to access spawning habitat.

[Comment 8-17]
The following text has been edited on page 4.F-15 (Table 4.F-1):

<table>
<thead>
<tr>
<th>California tiger salamander</th>
<th>FT/CSC, CCE</th>
<th>Wintering sites occur in grasslands occupied by burrowing mammals; breed in ponds and vernal pools.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ambystoma californiense</td>
<td></td>
<td></td>
</tr>
<tr>
<td>FE = Listed as endangered by the Federal Government</td>
<td>List 1A = Plants presumed extinct in California</td>
<td></td>
</tr>
<tr>
<td>FT = Listed as threatened by the Federal Government</td>
<td>List 1B = Plants rare, threatened, or endangered plants in California and elsewhere</td>
<td></td>
</tr>
<tr>
<td>FPE = Proposed for Listing as endangered</td>
<td>List 2 = Plants rare, threatened, or endangered in California but common elsewhere.</td>
<td></td>
</tr>
<tr>
<td>FPT = Proposed for Listing as threatened</td>
<td>List 3 = Plants about which more information is needed – a review list</td>
<td></td>
</tr>
<tr>
<td>FC = Candidate for Federal Listing</td>
<td>List 4 = Plants of limited distribution – a watch list</td>
<td></td>
</tr>
<tr>
<td>FSC = former Federal Species of Concern. Species designated as such in this EIR were listed by the Sacramento FWS office until 2006, when they stopped maintaining their list. These species are still considered to be at-risk species by other federal and state agencies, as well as various organizations with recognized expertise such as the Audubon Society.</td>
<td>0.1 = Seriously endangered in California</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.2 = Fairly endangered in California</td>
<td></td>
</tr>
<tr>
<td></td>
<td>0.3 = Not very endangered in California</td>
<td></td>
</tr>
</tbody>
</table>

State Categories (California Department of Fish and Game)

| CE = Listed as endangered by the State of California | CCE = Candidate for listing as endangered by the State of California |
| CT = Listed as threatened by the State of California | * = Special Animals as defined by CDFG |
| CR = Listed as Rare by the State of California | CSC = California Species of Special Concern |
| CFP = California fully protected species | WL = Watch List |

[Comment 1-1]

The following text has been edited on page 4.F-18 (fourth paragraph):

**California tiger salamander.** The California tiger salamander (CTS) is listed as federally threatened, and a California Species of Special Concern and a California candidate endangered species. Most of the occurrences of this species in Sonoma County are from the complex of vernal pools and drainages of the Santa Rosa Plain along the Laguna de Santa Rosa watershed, generally between Sebastopol, Santa Rosa, and Cotati. Extensive habitat conversion and fragmentation of breeding habitat has eliminated this species from much of its former range. There are recent records of this species in the southwest corner of Santa Rosa (CDFG, 2008), and protection measures for this species is described in the Santa Rosa Plain Conservation Strategy (see Regulatory Framework, below).

[Comment 1-1]

The following text has been added on page 4.F-21-22 (under heading Special-status fish):

**Special-status fish.** The California coast steelhead evolutionarily significant unit (ESU) and the California coastal Chinook salmon ESU are both federally threatened species. Steelhead are currently present in Santa Rosa Creek, Rincon Creek, and the south fork of Santa Rosa Creek, and Chinook salmon have recently been observed in Santa Rosa Creek (City of Santa Rosa, 2007b). Several streams in the Planning Area could support salmonids if fish passage impediments are removed, including Matanzas, Austin, Rincon, Brush,
Ducker, Piner, Paulin, and the upper reaches of Santa Rosa Creek. Other special-status fish may be present in the Planning Area as well, such as the Russian River tule perch, a California Species of Special Concern.

[Comment 8-18]

The following text has been edited on page 4.F-25 (third paragraph):

The federal Migratory Bird Treaty Act (16 USC, Sec. 703, Supp. I, 1989) prohibits killing, possessing, or trading in migratory birds, except in accordance with regulations prescribed by the Secretary of the Interior. This act encompasses whole birds, parts of birds, and bird nests and eggs. Birds of prey are protected in California under the State Fish and Game Code, Section 3503.5 (1992). Section 3503.5 states that it is “unlawful to take, possess, or destroy any birds in the order Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.” Construction disturbance during the breeding season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “taking” by the CDFG. Any loss of fertile eggs, nesting raptors, or any activities resulting in nest abandonment would constitute a significant impact. Project impacts to these species would not be considered significant unless they are known in or have a high potential to nest in the project area or to rely on it for primary foraging. Non-raptor native birds receive similar protection under California Fish and Game Code Section 3503. Specific project impacts to nesting, native birds within the Planning Area would not be considered significant unless they are known in or have a high potential to nest in the project area, or to rely on it for primary foraging, and the project would adversely affect these native, nesting birds. These impacts will be addressed at a project-by-project basis.

[Comment 1-2]

The following text has been edited on page 4.F-36:

Expansion of urban land uses under the proposed General Plan 2035 would not fundamentally conflict with any adopted habitat conservation plans. The 2005 Santa Rosa Plain Conservation Strategy covers the Santa Rosa Plain in western Santa Rosa and has not yet been implemented, but may be implemented prior to 2035. This Conservation Strategy includes mitigation measures that are designed to lessen impacts to California tiger salamander, Burke’s goldfields, Sonoma sunshine, Sebastopol meadowfoam, and many-flowered navarretia, to a less than significant level. Although the Santa Rosa Plain Conservation Strategy has not yet been adopted, the USFWS Programmatic Biological
Opinion (2007) for all of the species covered under this Conservation Strategy (except for many-flowered navarretia), can still be invoked for projects that have suitable habitat for these species, California tiger salamander, Burke’s goldfields, Sonoma sunshine, and Sebastopol meadowfoam, and many-flowered navarretia, and that impact wetlands in the Santa Rosa Plain.

[Comment 1-4]

The following text has been edited on page 4.G-1 (third paragraph, last sentence):

Although there are no legal constraints to the SCWA’s ability to use groundwater supplies, the amount of groundwater expected to be pumped by the agency is projected to remain stable between 2010 and 2030, at $3,820 \pm 3,870$ acre-feet/year.

[Comment 8-1]

The following text has been edited on page 4.G-1 (fourth paragraph, second sentence):

Two wells were converted from emergency to active status in July 2005 and can provide up to 2,300 acre feet per year (ac-ft/year) of supply.

[Comment 8-2]

The following text has been edited on page 4.G-2 (last paragraph, second sentence):

In combination, the limit on annual diversions is currently a maximum of 92 mgd or 75,000 acre feet annually (October 1st to September 30th) with a maximum diversion rate of 180 cubic feet per second.

[Comment 8-3]

The following text has been revised on page 4.G-3 (first paragraph, fourth sentence):

In May 2003, the Court of Appeals reversed the trial court’s initial decision, concluding that the EIR was inadequate because it did not contain certain cumulative impacts and alternatives analyses, and its environmental setting description was deficient.

[Comment 8-5]
The following text has been added on page 4.G-3 (first paragraph under “Temporary Impairment Condition and Restructures Agreement for Water Supply,” second to last sentence):

Collector No. 6 has since been constructed and is operational.

[Comment 8-6]

The following text has been edited on page 4.G-5 (end of first paragraph):

The increased reduced flows required by these measures would still provide enough water for the SCWA’s diversion to meet existing water demands. To the extent that the reduced flows in Dry Creek may affect the SCWA’s ability to meet peak summer demands, available supply during these periods will be allocated per Section 3.5 of the Restructured Agreement as further defined in the SCWA’s adopted Water Shortage Allocation Methodology and in accordance with a summer allocation methodology proposed by SCWA staff in early 2009. Additionally, Santa Rosa’s local supplies of groundwater and recycled water can be used to supplement SCWA supply during peak use months.

[Comment 8-7]

The following text has been edited on page 4.G-5 (text under “Inflatable Dams in the Russian River”):

The SCWA’s ability to extract water from the Russian River depends on the amount of water that is recharged to the aquifer. In order to augment the natural recharge capability, SCWA operates an the inflatable dams to supply infiltration ponds and increase backwater to ultimately increase groundwater levels. The SCWA determined that hydrologic conditions are stressed in fall and early winter, not stressed in winter, and again stressed in spring, prior to using the inflatable dams in the low flow periods of summer. Although the SCWA operates the dams under permit, the NMFS has discouraged the practice of raising and lowering the dams. The ability to raise and lower the dams, however, provides the SCWA the ability to provide adequate and reliable water supply to meet demands that are sometimes variable. The dams also assist the SCWA in conducting river maintenance activities. As water demand increases, the SCWA will continue to rely on the use of the an inflatable dams but will likely require its their use during longer periods of the year. If the SCWA is not able to use the inflatable dams due to regulatory, environmental or mechanical constraints, its their production capacity could be temporarily impaired.

[Comment 8-8]
The following text has been revised on page 4.G-8 (third paragraph):

California Water Code § 10610 requires the Agency to prepare a regional Urban Water Management Plan for the Agency and its eight primary water contractors, describing the availability of water, water use, reclamation, and water conservation activities. This plan, the 2005 SCWA Urban Water Management Plan concludes that, with the given assumptions of the water supplies available to the Agency’s water transmission system, water supplies are adequate over its 20-year planning period, or until 2025. The approval of the SCWA 2005 Urban Water Management Plan was vacated by the Sonoma County Superior Court in October 2008 on findings that certain elements did not meet statutory requirements. These elements do not affect the validity of the dry year analysis that was referenced by the Water Supply Assessment for Santa Rosa General Plan 2035.

[Comment 8-10]

The following text has been revised on page 4.H-3 (last paragraph, first sentence):

Surface water quality in most of Sonoma County is monitored by the North Coast Regional Water Quality Control Board (RWQCB), although the Petaluma River Basin and Sonoma Creek, which are within Sonoma County but flow into San Pablo Bay, are under the authority of the San Francisco Bay Regional Water Quality Control Board.

[Comment 8-19]

The following text has been revised on page 4.H-6 (second full paragraph, second sentence):

In compliance with the SCWA FCDC, all culverts and drainage systems must be designed to accommodate the runoff from a 25-year recurrence interval storm event and safely pass the 100-year recurrence interval storm. Underground storm drains must be designed to carry flows expected from a 10-year storm. The design of bridges, culverts, and open waterways should be based on watershed size (although this does not guarantee that flooding will not occur, nor necessarily mitigate all flooding-related risks).

[Comment 8-20]
The following text has been revised on page 4.H-6 (second full paragraph, last sentence):

In addition, SCWA is in the process of revising and updating the FCDC to reflect a lower impact approach include a low impact development (LID) approach.

[Comment 8-21]

The following text has been edited on page 4.J-2 (third paragraph, fourth sentence):

The Lytton Band of Pomo Indians was first established in 1926 when Bert Steele, who was part Achomawi and part Nomlaki, and his Bodega Pomo wife, petitioned the government for a 50-acre parcel north of Healdsburg. In 1958 the U.S. government enacted the Rancheria Act of 1958, transferring tribal property into private ownership.

[Comment 5-4]

The following text has been edited on page 4.O-95 (second bullet):

- Attainment of AM-32 AB-32 goals to reduce California’s greenhouse gas emissions to 1990 levels by 2020; and

[Planning Commission Chair Duggan]

The following text has been edited on page 4.O-15 (last paragraph):

Adding 67,670 new residents and 33,800 new jobs will require additional energy for personal and work-related vehicle trips. Based on data provided by Dowling Associates, there will be 259,900 daily home-to work vehicle trips, 415,200 non-work home-based vehicle trips, 31,500 home-to-school vehicle trips, and 418,600 non-home based vehicle trips, within the urban growth boundary and additional transportation energy requirements for trips by Santa Rosa residents outside the city limits.

[Planning Commission Chair Duggan]
The following text has been edited on page 4.O-18 (last paragraph of Impact O-3):

Although transportation energy usage would continue to increase overall as population increases, policies outlined in the proposed General Plan 2035 would reduce transportation energy consumption the per capita transportation energy use.

[Planning Commission Chair Duggan]
CHAPTER 3
Agencies and Persons Commenting on the Draft EIR

A. Agencies and Persons Commenting in Writing

The following agencies, organizations and individuals submitted written comments on the Draft EIR during the public review period that began on March 9, 2009 and closed at 5:00 p.m. on April 23, 2009.

<table>
<thead>
<tr>
<th>Letter</th>
<th>Person/Agency and Signatory</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Department of Fish and Game (Charles Armor, Regional Manager)</td>
<td>April 20, 2009</td>
</tr>
<tr>
<td>2</td>
<td>Department of Transportation (Lisa Carboni, District Branch Chief)</td>
<td>April 23, 2009</td>
</tr>
<tr>
<td>3</td>
<td>Sonoma County (Yolanda G. Solano, Comprehensive Planning)</td>
<td>April 23, 2009</td>
</tr>
<tr>
<td>4</td>
<td>Santa Rosa’s Historic Railroad Square (Lynda T. Angell, President)</td>
<td>April 22, 2009</td>
</tr>
<tr>
<td>5</td>
<td>Tomaras and Ogas, LLP (Brenda L. Tomaras)</td>
<td>March 18, 2009</td>
</tr>
<tr>
<td>6</td>
<td>West End Neighborhood Association (Lea M. Barron-Thomas, President)</td>
<td>April 22, 2009</td>
</tr>
<tr>
<td>7</td>
<td>Donna Strom</td>
<td>April 21, 2009</td>
</tr>
<tr>
<td>8</td>
<td>Sonoma County Water Agency (Renee T. Webber, Division Manager, Environmental Resources and Public Affairs)</td>
<td>May 7, 2009</td>
</tr>
</tbody>
</table>
B. Commenters at the Public Hearings

Planning Commission

The following persons offered public comment during the City of Santa Rosa Planning Commission Public Hearings on the Draft EIR held at the Santa Rosa City Hall on April 2 and April 23, 2009:

- Planning Commission Chair Duggan
- Planning Commission Vice Chair Caston
- Commissioner Allen
- Commissioner Bartley
- Commissioner Cisco
- Commissioner Banuelos
- Commissioner Poulson
- Duane DeWitt
- Daisy Pistey-Lyhne (Greenbelt Alliance)
CHAPTER 4
Written Comments on the Draft EIR and Responses to Comments

This chapter contains copies of the comment letters during the public review period on the Draft EIR, and the individual responses to those comments. Each written comment letter is designated with a number (1 through 6) in the upper right-hand corner of the letter.

Within each written comment letter, individual comments are labeled with a number in the margin. Immediately following each comment letter is an individual response to each numbered comment. Where responses have resulted in changes to the Draft EIR, these changes also appear in Chapter 2 of this Response to Comments Document.
April 20, 2009

Mr. Troy Eggleston  
City of Santa Rosa  
100 Santa Rosa Avenue, Room 3  
Santa Rosa, CA 95402  

Dear Mr. Eggleston:

Subject: City of Santa Rosa General Plan Revision, SCH #2008092114, City of Santa Rosa, Sonoma County

The Department of Fish and Game (DFG) has reviewed the Draft Environmental Impact Report (EIR) for the City of Santa Rosa General Plan Revision. This draft EIR discusses the impacts associated with the physical development, growth management, transportation services, public facilities, community design, energy efficiency, greenhouse gas reduction strategies, and conservation of resources in the Planning Area.

The draft EIR states that the California tiger salamander (CTS) is designated as a California species of special concern. On February 5, 2009, the Fish and Game Commission accepted for consideration the petition submitted to list CTS as endangered. CTS is now a candidate species as defined by Section 2068 of the Fish and Game Code. The California Endangered Species Act (CESA) prohibits unauthorized take of a candidate species, just as it prohibits such take of threatened and endangered species. All activities, whether new or on-going, that will cause incidental take of the candidate species is in violation of CESA, unless the take is authorized in regulations adopted by the Commission pursuant to Fish and Game Code Section 2084, or DFG authorizes the take through the issuance of an Incidental Take Permit (ITP) under Fish and Game Code Section 2081, or by other means authorized by CESA.

Page 4.5F-25 discusses other statues, codes, and policies affording limited species protection for birds. This section discusses protection of birds under the Migratory Bird Treaty Act and Fish and Game Code § 3503.5; however, this section does not address Fish and Game Code § 3503, which states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Disturbances that cause nest abandonment (killing or abandonment of eggs or young) is considered "take." This section also states that project impacts to these species would not be considered significant, unless they are known to or have a high potential to nest in the project area or to rely on it for primary foraging. This statement has identified a project impact but was not included in the summary of impacts and mitigation measures. Mitigation measures should include pre-construction surveys. Pre-construction surveys should be conducted prior to any tree removal or ground-disturbing activities between February 1 and August 31. Surveys should be conducted no earlier than 14 days before activities. If nesting raptors are found, project applicants should consult and obtain approval for buffers with DFG prior to tree removal and/or ground-breaking activities.

Conserving California's Wildlife Since 1870

4-2
Page 4.F-36 states that the Santa Rosa Plain Conservation Strategy has not been adopted, but the Programmatic Biological Opinion can still be invoked for projects that have suitable habitat for CTS, Burke’s goldfield, Sonoma sunshine, Sebastopol meadowfoam, and the many-flowered navarretia. The Programmatic Biological Opinion covers only CTS, Burke’s goldfield, Sonoma sunshine, and Sebastopol meadowfoam. Impacts to the many-flowered navarretia would require an ITP under Fish and Game Code Section 2081, or by other means authorized by CESA.

The Santa Rosa General Plan 2035 has identified six biological resource impacts with five of these impacts being initially identified as less-than-significant. The discussions of each of these impacts has clearly stated that development under the proposed General Plan 2035 would have an impact to special-status species, habitat quality to streambeds and riparian areas, habitat areas and wildlife movement corridors, and wetlands, marshes and/or vernal pools and mitigation would not be required for these impacts. Each impact has identified proposed General Plan 2035 policies that would avoid, minimize, and/or provide compensatory mitigation. Impacts to special-status species, vernal pools, wetlands, and riparian areas should generally be considered significant. The measures identified in the General Plan are insufficient to support the finding that impacts would be less-than-significant. Many of the identified policies are vague. Additional, more specific, measures to avoid, minimize, or mitigate significant impacts to biological resources should be included.

If you have any questions, please contact Ms. Stephanie Buss, Environmental Scientist, at (707) 944-5502; or Mr. Richard Fitzgerald, Coastal Habitat Conservation Supervisor, at (707) 944-5568.

Sincerely,

Charles Armor
Regional Manager
Bay Delta Region

cc: State Clearinghouse
Letter 1. Department of Fish and Game
(Charles Armor, Regional Manager)

1-1 This comment refers to the February 22, 2009 designation of California tiger salamander as a candidate endangered species. This is new information since the writing of the Draft EIR, and will be incorporated into the document (see Chapter 2, Revisions to the Draft EIR). This recent federal action does not change the conclusions of the analysis.

1-2 Fish and Game Code Section 3503 of the California Fish and Game Code is referenced in footnote 4 on page 4.F-21 of the Draft EIR, but for clarity, text has been added to the Regulatory Framework section on page 4.F-25 (see Chapter 2, Revisions to the Draft EIR).

1-3 The Draft EIR evaluates a General Plan with no specific projects. Moreover, as described in Draft EIR Chapter 3, Project Description, the emphasis in General Plan 2035 is on encouraging infill development, increased density where appropriate, and improving transit, pedestrian, and bicycle access. Accordingly, the likelihood that future development under General Plan 2035 would adversely affect wildlife, including nesting raptors birds, is less than would otherwise be the case for a plan that anticipates large-scale conversion of open spaces to developed land and the Draft EIR concludes that effects on special-status species, in general, would be less than significant. That being the case, the General Plan policies and mitigation measures (see discussion below concerning Mitigation Measure 4.F-5) included in the Draft EIR are commitments that Santa Rosa will make to mitigate broad planning objectives, and not specific, individual projects.

Any subsequently proposed individual project will undergo further environmental analysis; where such projects are proposed in areas where development could adversely affect nesting raptors, such as in less-developed portions of Santa Rosa, specific mitigation measures (e.g., avoid impacts to nesting raptors and other special-status birds through seasonal restrictions, or preconstruction bird surveys and buffers of nests) will be identified and implemented for that specific project.

However, the Draft EIR identifies specific mitigation measures for areas of known biological value within the Planning Area, to ensure the protection of these rich biological resources as part of its general planning effort. In the case of the unique and biologically rich vernal pools in the Santa Rosa Plain, specific and carefully planned mitigation measures that are included in the Santa Rosa Plain Conservation Strategy are adopted by reference (Mitigation Measure 4.F-5). Mitigation measures described in this Conservation Strategy were designed to reduce impacts to the California tiger salamander, Burke’s goldfields, Sonoma sunshine, Sebastopol meadowfoam, and many-flowered navarretia to a less than significant level.

1-4 Although the Santa Rosa Plain Conservation Strategy has not been adopted, it is noted that the Programmatic Biological Opinion can still be invoked for all projects that have
suitable habitat for specific protected species. This is now clarified in the text on page 4.F-36 (see Chapter 2, Revisions to the Draft EIR).

1-5 Impacts to special-status species, vernal pools, wetlands, and riparian areas would likely be considered potentially significant for specific development projects, when analyzed individually (i.e., when actual impacts are expected to occur), but not under the General Plan 2035. See response to comment 1-3 above.
April 23, 2009

Mr. Troy Eggleston  
City of Santa Rosa  
100 Santa Rosa Avenue, Room 3  
Santa Rosa, CA 95402

Dear Mr. Eggleston:

City of Santa Rosa General Plan 2035 - Draft Environmental Impact Report (DEIR)

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review for the above-referenced project. The Department is primarily concerned with impacts to the State Highway System. Therefore, we provide the following comments:

The document only shows arterial level services in Table 4.C-1 and Table 4.C-5. Those results do not adequately address impacts to the state highway facilities. A Level of Service (LOS) analysis for all intersections in the state highway interchanges impacted by the proposed general plan should be included.

Table 4.C-3 uses volume over capacity (V/C) ratios to determine LOS for freeway mainline segments. The results do not reflect existing freeway operational conditions. Our data shows that congestion (LOS F) occurs upstream of State Route 12 in the northbound direction during AM and PM peaks. Theoretically, volumes, density and speeds are interrelated. A freeway roadway segment with an identical V/C ratio may have a higher vehicle travel speed with a lower density, or have a lower speed with a higher density.

Page 4.C-10 paragraph notes, "There is a relatively weak relationship between freeway level of service and travel speeds." We do not agree with this statement. In general, a lower speed represents a worse LOS. A bottleneck may have a speed ranging from 35 miles per hour (mph) to 55 mph at LOS E. Upstream bottleneck congestion would occur with a lower speed (under 35 mph) and worse LOS (i.e. LOS F).
Comment Letter 2

Mr. Troy Eggleston
April 23, 2009
Page 2

Page 4.C-18 Table 4.C-5 (continued)
- It would be more accurate to make this a new table with the title “BUILDOUT (2035) FREeway Level of Service.”
- Please include the LOS for State Route 12 in the PM peak.
- The table shows LOS F for mixed flow traffic. Please provide data showing how project trips from the proposed general plan will impact the state highway.

If you have any questions or need further information, call Alice Jackson at (510) 286-5988.

Sincerely,

Lisa Carboni
District Branch Chief
Local Development – Intergovernmental Review

c: State Clearinghouse

"Caltrans improves mobility across California"
Letter 2. Department of Transportation  
(Lisa Carboni, District Branch Chief)

2-1 The level of detail requested in the comment is appropriate for a project-level EIR or project study report, not a programmatic EIR. At the level of detail for which growth forecasts under the General Plan are available, it is not possible to undertake an accurate analysis of intersection level of service, and any such detailed analysis would be speculative.

The purpose of this kind of programmatic EIR analysis is to alert decision makers and the public when there is a strong probability that a transportation facility is unlikely to meet the demands placed upon it in the future with the proposed land uses. This differs from a project that is designed and ready for construction. In these cases, more detailed information is required with a higher degree of certainty. Thus, the requested level of detail by Caltrans is not inappropriate for this EIR, but should be considered at the specific plan, project, or traffic impact study level of analysis. For example, a significant new housing development near a freeway ramp or state highway is already required to analyze the impacts on the state facility.

2-2 It’s unclear from the comment whether the observations cited are pre- or post-widening of Highway 101 through central Santa Rosa (State Route 12 to Steele Lane). The High Occupancy Vehicle (HOV) lanes in both directions were added to this segment of Highway 101 in November 2008 after a period of construction which generally reduced traffic flow. It is believed that since this time, both the new lanes and the removal of the construction restrictions (e.g., narrowed lanes, lane shifts, etc.) have effectively eliminated the bottlenecks noted in the comment.

2-3 The comment correctly indicates that lower speeds are associated with lower levels of service. However, speed is just one factor playing a role in level of service. Recent research by UC Berkeley Institute of Transportation Studies researchers has shown that high speeds (85 percent of the posted speed limit) can be achieved at relatively high volume-to-capacity (v/c) ratios. See Pravin Varaiya, “What We’ve Learned about Highway Congestion,” in Access, Fall 2005, Number 25, University of California Transportation Center, Berkeley, pages 2-9.

2-4 The comment requested that Table 4.C-5 on page 4.C-18 of the Draft EIR be labeled as “build out” level of service. However, the forecast land uses used in the travel model are based on ABAG Projections 2007, which do not necessarily equate with complete build out of all parcels in the City of Santa Rosa. These represent anticipated conditions in the year 2035 based on ABAG’s projections of regional growth and desired land use allocation among Bay Area counties and cities.

The table below presents an estimate of the number of added trips to the state highways as a result of the proposed project housing. It is based on the Institute of Transportation...
Engineer’s (ITE) vehicle trip generation rates for land uses in the appropriate density range for the individual land uses. In total these projects would generate approximately 2,950 weekday vehicle trips at occupancy, of which roughly 1,050 would make use of a state highway for a portion of their trip. The estimates of state highway usage have been based on professional judgment and previous traffic impact studies done for the City of Santa Rosa.

### WEEKDAY VEHICLE TRIP GENERATION OF PROPOSED LAND USE CHANGES

<table>
<thead>
<tr>
<th>Name</th>
<th>Size (ac.)</th>
<th>Units</th>
<th>Gross Density (du/ac.)</th>
<th>Weekday Trip Rate</th>
<th>Vehicle Trips (trip-ends)</th>
<th>Nearest State Hwy</th>
<th>% Assigned to State Hwy</th>
<th>Total Trips added to State Hwy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Imwalle</td>
<td>2.87</td>
<td>71</td>
<td>24.7</td>
<td>6.65</td>
<td>472</td>
<td>12</td>
<td>35%</td>
<td>165</td>
</tr>
<tr>
<td>Air Center</td>
<td>4.36</td>
<td>109</td>
<td>25.0</td>
<td>6.65</td>
<td>725</td>
<td>12</td>
<td>40%</td>
<td>290</td>
</tr>
<tr>
<td>Mendo/Admin</td>
<td>3.2</td>
<td>80</td>
<td>25.0</td>
<td>6.65</td>
<td>532</td>
<td>101</td>
<td>40%</td>
<td>213</td>
</tr>
<tr>
<td>Kawana Springs</td>
<td>1.02</td>
<td>25</td>
<td>24.5</td>
<td>6.65</td>
<td>166</td>
<td>101</td>
<td>40%</td>
<td>67</td>
</tr>
<tr>
<td>SCWA</td>
<td>6.35</td>
<td>159</td>
<td>25.0</td>
<td>6.65</td>
<td>1057</td>
<td>101</td>
<td>30%</td>
<td>317</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td>17.8</td>
<td>444</td>
<td>-</td>
<td>6.65</td>
<td><strong>2,953</strong></td>
<td>101</td>
<td>-</td>
<td><strong>1,052</strong></td>
</tr>
</tbody>
</table>

Trip generation rates based on ITE land use code 220, apartment.
April 23, 2009

City of Santa Rosa
Planning Commission
P.O. Box 1678
Santa Rosa, California 95402

Att: Troy Eggleston
Department of Community Development

Re: Santa Rosa General Plan 2035 DEIR

The Sonoma County Permit and Resource Management Department staff has reviewed the Santa Rosa General Plan 2035 Draft Environmental Impact Report (DEIR) and offers the following comments for your consideration.

Transportation

The DEIR indicates that, in the year 2020, approximately 34 percent of Santa Rosa residents are expected to travel outside of the Santa Rosa urban boundary for work, 25 percent are anticipated to work in other parts of Sonoma County, and 9 percent would be employed in other counties. Consequently, the EIR needs to clearly state that the traffic impacts resulting from implementation of GP2035 would not be confined to those road segments within the City’s borders and would affect County roads and State highways throughout the area.

The DEIR states that implementation of the proposed General Plan 2035 would increase the amount of vehicle traffic and thus the number of potential safety conflicts but concludes that the City’s roadway design standards and policy provisions to maintain roads and improve traffic flow “would ensure that construction of roadway facilities associated with the proposed General Plan 2035 would not result in unacceptable safety conflicts.” However, the increased traffic impacts and mitigation needs that accompany community growth do not stop at City boundaries. The interconnectivity of traffic between the City and the adjoining County areas requires interagency coordination and cooperation in order to adequately address the effects of growth on both the local and regional circulation system. Cumulative traffic impacts will not be mitigated without meaningful consideration of the roadways beyond the City limits.

Increased demands placed on the County circulation system as a consequence of the implementation of GP2035 would necessarily result in the need for additional maintenance and improvements in order to address roadway safety and maintain an adequate level of service. The costs of maintenance and improvements to the countywide circulation network should be equitably distributed among those who cumulatively contribute to the need for such improvements. Accordingly, the cities of Petaluma and Rohnert Park have adopted policies to ensure that local development pays its fair share toward mitigation of regional traffic impacts. To this end, Santa Rosa General Plan 2035 should likewise include goals, objectives and policies which would require evaluation of impacts to the regional system and mitigation of cumulative traffic impacts by providing for the equitable distribution of costs through payment of Countywide traffic mitigation fees and/or fair share contributions to needed improvements.
Proposed Land Use Changes

The Draft General Plan 2035 proposes to redesignate a portion of County owned lands located at the corner of Mendocino Avenue and Administration Drive (APN 180-130-008) to Medium High Density Residential from the current Public/Institutional designation. In February, the County sent the attached letter requesting that the City reconsider this change. Although the County supports the effort to provide appropriate sites for affordable housing, the County is currently in the process of developing a Comprehensive County Facilities Plan for all major County owned properties and may consolidate County functions at the County Administration Center in order to increase efficiency and better serve community residents. Consequently, it is premature to designate any portion of the County Administrative Center site for housing at this time.

Similarly, the City should reconsider the proposed rezoning to Multifamily Residential of portions of the County fairgrounds site (the eastern portions of APN 009-410-001 & 009-420-001) that appear equally unsuitable for housing. The County Fairgrounds facility has contributed to the quality of life of County residents for over 70 years by serving as a venue for a wide variety of community events and entertainment. It would be self-defeating to designate sites for housing in anticipation of future growth, while by the very same legislative act, reduce the land area for the facilities necessary to adequately serve these same residents and provide the kinds of educational and recreational opportunities that enrich the experience of living in Sonoma County.

In addition, locating housing in the midst of a fairgrounds facility invites conflict. The very nature of this facility and its uses involves noise, dust, odors, and lighting at levels which are often incompatible with sensitive land uses such as residential units. Policy NS-B-1 of the Santa Rosa General Plan clearly prohibits the location of noise-sensitive uses in proximity to major noise sources. As a consequence, this incompatibility of adjoining land uses may inhibit the facility’s ability to serve the community function for which it was intended.

The challenging task of planning for the growth of a dynamic community requires that the County retain the ability to use its land resources so that the interests of all residents are best served. Consequently, we request that the City retain the Public/Institutional land use designation for these sites. It should be noted that these sites are currently used by the County and would not be available during the five-year Housing Element planning period. The County fully intends to keep the City apprised of future planning for the County Administration Center, Fairgrounds and other County-owned property and to involve the City in the planning process. To that end, we would not be opposed to a Housing Element program to work with the County to evaluate surplus County property for housing and to redesignate and rezone sites that are determined to be appropriate for housing development.

Conflicting Land Use Plans

The Land Use Consistency and Compatibility section of the DEIR identifies no inconsistencies between the proposed General Plan 2035 and the Sonoma County General Plan. The DEIR states that, “The proposed General Plan 2035 also assumes that future growth within unincorporated areas will proceed according to the Sonoma County General Plan.” However,
conflicts currently exist between City and County land use designations in some unincorporated areas which do not appear to be remedied by the proposed General Plan 2035.

With last year’s adoption of the Sonoma County General Plan 2020, the County redesignated nearly 40 parcels in the area around Santa Rosa Avenue south of Bellevue Avenue to bring them into conformance with the Santa Rosa General Plan. No adjustments, however, were made in designations where such a change in land use designation would have resulted in an existing use becoming nonconforming and created conflicts for existing businesses and uses that wanted to change or expand. Since the higher densities proposed by the City for many of these sites may encourage annexation into the City, the County has no objection to the proposed designations for long-term development but would recommend addition of policies to allow the continued use and expansion of existing uses under County jurisdiction before annexation takes place.

Annexation

As mentioned in previous County comments regarding the City’s Draft General Plan 2035, the existence of unincorporated pockets of land in the midst of a city is inherently inefficient for all parties involved, including the City, the County and the property owner. Annexation would relieve future developers of the cumbersome review process which currently requires approval of both jurisdictions. The City’s interest in ensuring that development occurs in a manner consistent with the City’s plans and standards would also be furthered by annexation. In addition, incorporating the large Roseland island would eliminate the confusion among residents regarding which emergency service provider serves their neighborhood and would allow the residents of Roseland to participate in the political process of the City that surrounds them. Therefore, the County strongly recommends that the Santa Rosa General Plan 2035 include a policy providing for the expedient annexation of the Roseland area into the City of Santa Rosa.

Annexation of the Roseland area would remove governmental constraints to the development of housing and would provide Santa Rosa with increased opportunities for higher densities. We recognize the need for zoning adequate sites to meet the regional housing needs allocation and suggest that the Roseland area provides both an existing supply of affordable housing that should be conserved and rehabilitated as well as opportunities for new housing and increased densities to meet projected demand.

Thank you for your thoughtful consideration of the concerns expressed above.

If you have any questions regarding these comments, please contact Yolanda Solano at (707) 565-7387 or by email at ysolano@sonoma-county.org.

Respectfully,
Comment Letter 3

Santa Rosa General Plan 2035 DEIR
April 20, 2009
Page 4 of 4

Yolanda G. Solano
Comprehensive Planning

c: Board of Supervisors
   Bob Deis, CAO
   Suzanne Smith, SCTA
   Mike Wagner & José Obregón, General Services
   Tawny Tesconi, Fairgrounds
   Pete Parkinson & Jennifer Barrett, PRMD

Attachment

S:\COMP\General Plan Consistency Review\2009 DETERMINATIONS\City of Santa Rosa GP2035 DEIR#3.doc
Letter 3. Sonoma County  
(Yolanda G. Solano, Comprehensive Planning)

3-1 The comment is in regard to the General Plan’s effects on County roads and State highways throughout the area. Cumulative traffic impacts of the proposed General Plan 2035 on US Highway 101 and State Route 12 are discussed on page 4.C-28 of the DEIR (Cumulative Traffic Impacts on Freeway Operations). The Draft EIR identifies this impact as Significant and Unavoidable. Text has been added on page 4.C-28 to reflect the fact that traffic generated as a result of the proposed project would contribute to traffic congestion along other County road and State highway segments throughout the area. (see Chapter 2, Changes to the Draft EIR in Response to Comments)).

3-2 The Draft EIR addresses roadway safety and emergency access on page 4.C-25. To ensure that traffic safety is maintained in the adjoining County areas despite potential increases in traffic volumes, General Plan 2035 includes Policy T-D-5, which states the following: “Coordinate transportation plans with those of Sonoma County, the Metropolitan Transportation Commission, and the State of California.” The implementation of this Policy would mitigate any cumulative traffic safety-related impacts that may occur beyond the City’s limits.

3-3 The comment requests that City of Santa Rosa contribute its proportionate share to the fund used to maintain the countywide circulation network and requests that General Plan 2035 include goals, objectives and policies that would require evaluation of impacts to the regional transportation system and mitigation of cumulative traffic impacts by paying traffic mitigation fees and/or fair share contributions to needed improvements. The Draft EIR analyzed traffic impacts, including cumulative traffic impacts, in Section 4.C. The Draft EIR presented various mitigation measures (under the discussion of Impact 4.C-6) that could be implemented to reduce cumulative traffic impacts in areas beyond City limits, but concluded that cumulative traffic impacts would remain cumulatively considerable and unavoidable since the extent of benefit would vary on a case-by-case basis and cannot be determined at this time. Policy T-D-5, which states the following: “Coordinate transportation plans with those of Sonoma County, the Metropolitan Transportation Commission, and the State of California” would assist in coordination between the City and County in addressing cumulative traffic impacts.

3-4 The comment requests that the City not redesignate County owned lands located at the corner of Mendocino Avenue and Administration Drive (APN 180-130-008) from the current Public/Institutional to Medium High Density Residential designation. This comment pertains to the contents of the General Plan 2035 and does not appear to address environmental issues analyzed in the Draft EIR. The comment is noted.

3-5 The comment requests that the City reconsider the proposed rezoning to Multifamily Residential of portions of the County fairgrounds site (the eastern portions of APN 009-410-001 & 009-420-001) and that they would be unsuitable for housing. This comment is
noted. Regarding any potential adverse impacts related to land use compatibility issues that may occur in the event the fairgrounds site is developed, these would be analyzed in more detail as part of the project-specific analysis and would be mitigated to the extent feasible at that time.

3-6 The comment requests that land use designation conflicts that currently exist between City and County in some unincorporated areas be resolved in the General Plan. This comment concerns the contents of the General Plan 2035 and is noted. It is also noted that utility provisions ensure consistency of these unincorporated areas with the City’s General Plan. The comment also states that the City should include General Plan policies concerning “the continued use and expansion of existing uses under County jurisdiction before annexation takes place.”

3-7 The comment recommends that the Santa Rosa General Plan 2035 include a policy providing for the expedient annexation of the Roseland area into the City of Santa Rosa. The comment is noted.
April 22, 2009

Dear Mr. Goldberg and Mr. Eggleston,

The Historic Railroad Square Association has been following the General Plan update. We continue to have concerns about the possibility of losing street parking on Wilson Street, which we addressed from a policy standpoint in our letter of April 2, 2009. We now address that issue from the standpoint of the adequacy of the EIR.

It seems very clear to us that if the City is going to consider any bike lane proposal which reduces or eliminates parking along Wilson Street from 3rd Street to 9th Street, the present EIR is inadequate for the following reason:

• The EIR does not address the impact of lost street parking on the economic vitality of the area. The nature of retail in the Railroad Square area is highly dependent on parking and particularly, parking close to the proximity of individual stores.

• The EIR does not address reduced revenue to the City of Santa Rosa, a natural by product of reduced economic vitality. We believe parking is so critical that is it more than reasonable to assume a reduction of parking of 70+ spaces along Wilson Street would spell significant sales reduction and possible closure of some retail establishments and impact future retail development. The impact on revenue to the City is not addressed.

• Street parking has a well recognized traffic calming impact. Railroad Square has a fairly significant pedestrian population. Retail establishments rely on a feeling of safety for patrons, who often window shop leading to retail sales. With parking removed on Wilson Street, the traffic impact on the perception of safety of the sidewalks will be significantly impacted. The EIR does not address this issue.

• If Wilson Street were to lose upwards of more than 70 spaces for parking, parking pressure on the West End Neighborhood would increase. This residential inconvenience has not been addressed in the EIR, nor has the fact that such impact would pit retail against a thriving and revitalized residential neighborhood.
In the Draft Bike & Pedestrian Master Plan there appears a bus stop at 4th and Wilson. The EIR does not address its impacts on traffic, pedestrian and bicycle safety.

The nature of Wilson Street, a narrow road running through a historic district is not addressed in relation to the historic buildings and frequent lack of set back of those buildings. Street parking has provided some buffer for the historic buildings. The EIR does not address this issue.

Obviously, if the final policy decision leaves the street parking intact on Wilson Street, these significant EIR deficiencies are of no consequence. But a policy decision that removes any parking along Wilson Street without consideration of these issues in the EIR would, in our opinion, be in violation of CEQA.

Thank you for your consideration of our concerns. In the end, our Association exists to support the economic viability of Historic Railroad Square. Railroad Square has enjoyed a resurgence over the last several years and with SMART and new retail outlets going in, even in this economy, the charm and vitality is growing. We hope that the delicate balance of customer needs in this unique area is carefully examined before any substantial changes are instituted which could reverse the current trend.

Very truly yours,

Lynda T. Angell, President

Cc: Susan Gorin, Mayor, City of Santa Rosa & Members of the City Council
    Jeff Kolin, City Manager
    Vicki Duggan, Chair, Planning Commission; Nick Caston, Vice-Chair; Michael Allen; Caroline Banuelos;
    Scott Bartley; Patti Cisco; and David Poulsen
    Bryan Much, Chair, Cultural Heritage Board
    Paul Klassen, Chair, Bicycle & Pedestrian Advisory Board
    Peter Stanley, Bicycle & Pedestrian Advisory Board
    Bob Dunlavey, Director, Transit & Parking
    Cheryl Woodward, Deputy Director, Transit & Parking
    Rick Mosher, Director of Public Works
    David Gouin, Director, Economic Development
    Shirley Stevens, Redevelopment Administrative Secretary
    Fabian Favila, Transit & Parking, BPMP Staff
    Jason Nutt, Deputy Director of Public Works, BPMP Staff
    Lisa Grant, Recreation & Parks, BPMP Staff
    Fred Browne, Community Development, BPMP Staff
    Heather Hines, City Planner, BPMP Staff
    Bill Rose, City Planner, BPMP Staff
    Clare Hartman, City Planner, BPMP Staff
    John Stewart, The John Stewart Company
    Michael Dieden, Principal, Creative Housing Associates
    Lea Barron-Thomas, President, WestEnd Neighborhood
Letter 4. Santa Rosa’s Historic Railroad Square
(Lynda T. Angell, President)

4-1 The removal of on-street parking is not considered an environmental impact. A Court of Appeal decision (regarding a challenge to San Francisco’s treatment of parking as a social, not physical, effect) held that parking is not part of the permanent physical environment, and that parking conditions change over time as people change their travel patterns. Unmet parking demand created through implementation of the General Plan 2035 on Wilson Street would not be considered a significant environmental effect under CEQA unless it would cause a significant secondary effects.1

Parking deficits may be associated with secondary physical environmental impacts, such as air quality and noise effects, caused by congestion resulting from drivers circling as they look for a parking space. However, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, shuttles, taxis, bicycles, or travel by foot), may induce drivers to shift to other modes of travel, or change their overall travel habits. The proposed transportation facilities would further encourage alternative transportation and increase the potential that trips currently made by car would instead be made by bicycle, resulting in a reduction in parking demand.

Additionally, regarding potential secondary effects, cars circling and looking for a parking space in areas of limited parking supply is typically a temporary condition, often offset by a reduction in motor vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts that might result from a shortfall in parking in the vicinity of the proposed projects in the General Plan 2035, are considered less than significant.

4-2 Economic impacts are not CEQA issues per se (see CEQA Guidelines Section 15131). CEQA specifically concerns impacts that would result in a physical change in the environment. The impacts of removing on-street parking to provide for bicycle or transit facilities on Wilson Street is not considered a CEQA impact (see response to comment 4-1). Furthermore, the removal of on-street parking would not be relevant to CEQA economic analysis unless there was likelihood that the project would result in significant physical deterioration of properties or structures and, thereby, leading to urban decay. Because there is additional parking proximate to Railroad Square, and because of the inherent attraction of the area to visitors and residents, the City does not consider that the loss of parking spaces on Wilson Street would likely result in economic impacts such that buildings in the area would be anticipated to be abandoned or otherwise deteriorate.

1 San Franciscans Upholding the Downtown Plan v. the City and County of San Francisco (2002) 102 Cal.App.4th 656.
Street parking, as well as bicycle facilities and bus service, are all well recognized traffic calming techniques (see response to comment 4-5 below). The proposed project would remove parking to add a proposed bus stop. A limited number of parking spaces would be removed to accommodate transit service. Furthermore, as stated in response to comment 4-1, the removal of parking is not, in itself, a CEQA issue.

See response to comment 4-1 regarding the removal of on-street parking.

The “Wilson Street Corridor Review,” which was part of a stakeholders meeting in February 2009, identified a bus top at the intersection of Fourth and Wilson Streets. The Wilson Street Corridor Review will be incorporated into the text of the Bicycle and Pedestrian Master Plan (BPMP) update when it is published later in 2009.

Bus service on Wilson Street serves as a “traffic calming” effect for the proposed Class III bicycle facility (signed bicycle route, but not a dedicated lane for bicycles), which is why transit facilities are referenced in a pedestrian and bicycle planning document. Class III is typically a low speed, low (traffic) volume facility. It is documented that the average driver would not attempt to overtake the bus; if they do, they do so slowly. Examples where this currently exists and works are Polk, Union, Fillmore, and Chestnut Streets in San Francisco, with Polk Street being the most applicable to Wilson Street, here, as the BPMP proposes the same street treatments and traffic controls.

A secondary benefit of having bi-directional transit service on Wilson Street is that it would serve the future SMART site. In addition, it complements the existing east-west service on Third Street. Having a north-south route would increase the ability to service the SMART site without substantially increasing transit operating costs.

The two bus stop locations of concern are at Wilson and 4th Streets: the northwest corner (near side stop) and the northeast corner (far side stop). The proposed bus stop on the northeast would require removing of parking south of the La Rose Hotel for curb access which is required for ADA compliance. Parking is already prohibited on the west side of the street so no on-street parking would be removed on the northwest corner. Buses would simply stop in the lane (as they do now throughout most parts of the City) adding further to the traffic calming effects.

The proposed bus stops would not impede, but would act as traffic calming on Wilson Street, thus making it more pedestrian, bicycle and transit friendly. This is consistent with the Northern Downtown Pedestrian Linkage Study and the Downtown Station Area Specific Plan, and GP T-D-1 which exempts Wilson Street from the LOS D or better policy. Further, the “Wilson Street Corridor Review” proposal would provide direct bus access to the heart of Railroad Square, which would increase alternative transportation modes to the shopping district.
4-6 Street parking is not considered buffer for historic buildings as it is a non-static use of space, and the removal of parking to provide on-street bicycle or transit facilities would not cause a significant impact to the historic district.

4-7 As discussed in response to comment 4-1, the removal of parking is not a CEQA impact, but rather a social impact. Thus, the implementation of the proposed BPMP would not be considered a significant impact related to removal of on-street parking on Wilson Street to provide for a bicycle or transit facilities.
March 18, 2009

Mr. Troy Eggleston  
Department of Community Development  
City of Santa Rosa  
100 Santa Rosa Avenue  
P.O. Box 1678  
Santa Rosa, CA 95402  

Re: Santa Rosa General Plan 2035 and DEIR  

Dear Mr. Eggleston:

This comment letter is submitted on behalf of the Lytton Rancheria of California (hereinafter, "Lytton Rancheria" or "Tribe"), a federally recognized Indian tribe and sovereign government. The Lytton Tribe submits the following comments on the City of Santa Rosa’s General Plan 2035 and associated DEIR. We request that these comments, as well as any subsequent comments submitted by the Lytton Tribe, be included in the record for approval of the Projects.

REQUESTED NOTICE AND INVOLVEMENT

The Lytton Tribe formally requests, pursuant to Public Resources Code §21092.2, to be notified and involved in the entire environmental review process under CEQA during these anticipated Projects. This includes adding the Tribe to your distribution list(s) for public notices and public circulation of all documents pertaining to the Projects. The Tribe further requests to be directly notified of all public hearings and scheduled approvals concerning the General Plan Update.

THE LEAD AGENCY MUST INCLUDE INVOLVEMENT OF AND CONSULTATION WITH THE TRIBE IN ITS REVIEW PROCESS

It has been the intent of the Federal Government\(^1\) and the State of California\(^2\) that Indian

\(^1\) See Executive Memorandum of April 29, 1994 on Government-to-Government Relations with Native American Tribal Governments and Executive Order of November 6, 2000 on Consultation and Coordination with Indian Tribal Governments.
tribes be consulted with regard to issues which impact cultural and spiritual resources, as well as other governmental concerns. The responsibility to consult with Indian tribes stems from the unique government-to-government relationship between the United States and Indian tribes. This arises when tribal interests are affected by the actions of governmental agencies and departments such as approval of Specific Plans and EIRs. In this case, it is undisputed that the project lies within Lytton Tribe’s traditional territory and the Tribe appreciates the City of Santa Rosa’s willingness to consult with the Tribe on the General Plan Update, as well as to keep the Tribe informed of the progress of the General Plan Update.

**LYTTON TRIBAL CULTURAL AFFILIATION TO THE PROJECT AREAS AND PROJECT IMPACTS TO CULTURAL RESOURCES**

The Lytton Tribe is not opposed to the General Plan Update in the City of Santa Rosa. The Tribe’s primary concerns stem from the likely impacts on Native American cultural resources which would result from projects developed under the General Plan Update. The Lytton Tribe has a legal and cultural interest in the proper protection of sacred places and all Pomo cultural resources. The Tribe is concerned about both the protection of unique and irreplaceable cultural resources, such as Pomo village sites and archaeological items which would be displaced by development, and with the proper and lawful treatment of cultural items, Native American human remains and sacred items likely to be discovered in the course of development and improvements within the City of Santa Rosa and its sphere of influence.

The Pomo people traditionally occupied the geographical area known today as the County of Sonoma for thousands of years, including the area within the City of Santa Rosa. This is verified through stories and songs of the Pomo people that are cultural evidence of the Tribe’s cultural affiliation with these lands. Occupation is also evidenced through the location of the Tribe’s prior reservation, anthropological studies, archaeological studies, and histories of the area. In addition, Tribal ties to these territories have been maintained to the present day through cultural and governmental actions.

As a preliminary matter, the Tribe has noted some inaccuracies in the ethnographic discussion section of the DEIR. The Lytton Rancheria was established by the Federal government in 1926, rather than in 1937 as noted. After the illegal termination in the 1960s, the Lytton Rancheria, along with three other tribes, was restored through litigation in 1991.

Pursuant to the DEIR, there are approximately one hundred sixty-one known prehistoric archaeological resources within the City of Santa Rosa and its sphere of influence. Therefore, the Tribe requests that adequate archaeological investigation be performed for all projects within the City and in the case of discovery of new or additional sites, that the City of Santa Rosa re-evaluate the projects’ impacts to cultural resources and adopt appropriate mitigation measures to address such impacts. Further, in the case of projects which entail large amounts of ground disturbance, the Tribe would request that the City of Santa Rosa consider requiring archaeological monitoring during those phases of such projects. Given that Native American

---

cultural resources may be affected by projects within the City of Santa Rosa, the Tribe should be allowed to be involved and participate with the City of Santa Rosa in developing all monitoring and mitigation plans for the duration of the projects.

Finally, the Tribe believes that if human remains are discovered, State law would apply and the mitigation measures for the Project must account for this. According to the California Public Resources Code, § 5097.98, if Native American human remains are discovered, the Native American Heritage commission must name a “most likely descendant,” who shall be consulted as to the appropriate disposition of the remains.

**PROPOSED GENERAL PLAN POLICIES**

The Tribe has reviewed the draft EIR and the General Plan 2035 and is generally in agreement with the policies revisions proposed in the DEIR. However, the Tribe has noted that the revisions proposed by the DEIR have not yet been made to the General Plan 2035 document. The Tribe would request that the changes be made to reflect the City’s intended policies and guidelines.

The Lytton Tribe looks forward to working together with the City of Santa Rosa and other interested agencies in protecting any invaluable Pomo cultural resources found in the City of Santa Rosa and its sphere of influence. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

TOMARAS & OGAS, LLP

Brenda L. Tomaras
Attorneys for the Lytton Rancheria of California
Letter 5. Tomaras and Ogas  
(Brenda L. Tomaras)

5-1 Comments requesting that the Lytton Tribe be formally notified during public notices and public circulation of documents pertaining to the Santa Rosa General Plan 2035 and associated Draft EIR are noted.

5-2 Comments stating that the Lytton Tribe appreciates the City of Santa Rosa’s efforts to consult during the General Plan 2035 process are noted.

5-3 Comments stating that the Lytton Tribe is concerned about the protection of Pomo cultural resources are noted. The Santa Rosa General Plan 2035 and associated Draft EIR identify a number of goals and policies intended to protect cultural resources. Please see page 4.J-2 of the Draft EIR and page 11-1 of the Santa Rosa General Plan 2035. Comments that the Pomo people traditionally occupied the area within the City of Santa Rosa are noted.

5-4 The Draft EIR has been modified to clarify that the Lytton Rancheria was established in 1926, rather than in 1937 (see Chapter 2, Changes to the Draft EIR in Response to Comments).

5-5 With regard to comments about additional archaeological investigation during ground-disturbing projects within the City of Santa Rosa, please see policies HP-A-1 and HP-A-2 on page 4.J-11 of the Draft EIR and page 11-3 of the Santa Rosa General Plan 2035. With regard to comments about Native American involvement during the development review process, please see policy HP-A-4 on page 4.J-11 of the Draft EIR and page 11-3 of the Santa Rosa General Plan 2035.

5-6 The appropriate treatment of human remains has been included as new policy HP-A-5. Please see page 4.J-11 of the Draft EIR which requires that the policy be added to the Historic Preservation polices of the Santa Rosa General Plan 2035.

5-7 Comments requesting that policy revisions in the Draft EIR be made in the General Plan 2035 are noted.
April 22, 2009

Advance Planning & Public Policy
100 Santa Rosa Avenue
Room 10
Santa Rosa, CA 95404

Re: Santa Rosa General Plan Update - 2009

Dear Lisa Kranz,

Please address these questions with in EIR review of the General Plan Update 2035

Chapter 5 Transportation
1. Does the current designation of proposed Class Two bike route with in the Station Area Specific Plan on Wilson create a conflict with the Draft General Plan update 2035 which shows a proposed Class Three on Wilson? (See figure 5-2 Draft G.P 2035)

2. Do the comments from Design Community & Environment regarding the Downtown Station Area Specific Plan Final EIR adequately address the potential impacts of the elimination of on-street-bike-lanes with in the areas of the Station Area Specific Plan? (See pages 152, 153 and 154 of S.A.S.P Final EIR- Clearing House number 2006072104- regarding Letter 14: dated March 29, 2007.)

3. Would the acquisition of additional right of way and possible demolition of historic structures or removal of parking on Wilson Street to accommodate on-street-bike-lanes pose a potential negative impact to the Railroad Square Historic District and West End Neighborhood? (See pages 152, 153 and 154 of S.A.S.P Final EIR- Clearing House number 2006072104- regarding Letter 14: dated March 29, 2007.)

4. How can the Draft General Plan incorporate policies from the Bicycle and Pedestrian Master Plan if the Bicycle and Pedestrian Master Plan draft has not been made public? (See introduction 1-10 G.P. Draft 2035)

5. Will the Bicycle and Pedestrian Master Plan need to have a separate environmental review if it is not reviewed under the General Plan 2035 Update EIR? (See page 2-2 of Draft EIR)
Chapter 6 Public Service and Facilities

1. Why has the De Turk Round Barn Park been added to the Table of Community/Recreation Facilities 2008 and will this designation have any impact on its listing on the National Register of Historic Places or the neighbors that live with in close proximity regarding noise and traffic impacts? What was the source and reason for the new designation of the De Turk Round Barn to a Community/Recreation Facility? (See Table 6-4 Draft G.P. 2035)

2. Will De Turk Round Barn Park remain a neighborhood Park? (See Table 1-6 Draft G.P. 2035)

3. Has the DeTurk Round Barn been separated from the DeTurk Round barn Park to be used as a community Center? If so, what prompted this change and how will this change the way the Round Barn and Park are currently used- as a neighborhood park?

4. How will the existing parks under two acres, now known as neighborhood parks, be recognized in the general plan? Will their uses be changed?

5. Table 6-4 Draft G. P. 2035 is different than the same table in the current General Plan 2020. There is no indication that these have changed in the draft or the reason for the changes. Specifically, list all proposed changes in the General Plan 2035, Chapter 6 from the General Plan 2020, Chapter 6.

Thank you for your attention to these matters.

Sincerely,

[Signature]

Lea M. Barron-Thomas
President, West End Neighborhood Assoc.
Comment Letter 6

PO Box 3088
Santa Rosa CA
95402-3088
707-543-0153
707-533-0476 ext.
www.BikeSonoma.org

BOARD OF DIRECTORS
Viola Duggan, (President)
Mike Eunice, (Secretary)
Tim Gonzales
Ed Kirsch
Tom Maumber
Deanna McKenzie
Marty Mesel, (Treasurer)
Lou Salz
Katherine Storin
Ken Wells, (Vice President)
Gary Wysocky

EXECUTIVE DIRECTOR
Christine Culver

ADVISORY BOARD
Janice Eunice
Debora Fudge
Vincent Hoagland
Jim Keene
Levi Leipheimer
Jake Mackenzie
William
Montgomery
Ross Shafer
Steven Schmitz
Pamela Torlatt
Joel Woodhull
Lynn Woznicki

● Policy T-K-2: Allow the sharing or parallel development of pedestrian walkways with bicycle paths, where this can be safely done, in order to maximize the use of public rights-of-way.

Goal T-L: Develop a citywide system of designated bikeways that serves both experienced and casual bicyclists and which maximizes bicycle use for commuting, recreation and local transportation.

● Policy T-L-4: Identify specific east-west and north-south bicycle routes through the downtown area as part of the downtown planning process.

● Policy T-L-9: Require new development to dedicate land and/or construct/install bicycle facilities for project users, where a rough proportionality to demand from the project is established.

● Policy T-L-10: Maintain and update, as appropriate, the pedestrian and bicycle network facilities map for Santa Rosa and the surrounding area.

All of this is very encouraging. However what we have found after further study is this:

- The SAP eliminates planned Class 2 bicycle lanes in several areas.
- Fails to address the safety issues of bicycles and cars sharing the lane.
- Doesn't implement policies of slower speeds and significant engineering on downtown streets.
- Increased vehicular traffic will significantly impact bicycle and pedestrian circulation in the downtown.
- The plan overemphasizes vehicle circulation at the expense of bicycles and pedestrians.
- Many mistakes regarding current existing bicycle facilities.
- Bicycle parking is ignored completely.
- Incomplete language regarding the description of the 6th 7th streets linkage project.
- The addition of Roberts Avenue is in the same location as the Joe Rodota Class 1 path. The streetscape will be limited by width and shows no bike lanes. This would be viewed as adding a barrier for bikes and peds. The addition of Roberts Avenue does not meet the goals of improving bicycle and pedestrian circulation.

The Draft Environmental Impact Report states that the impacts of the SAP on bicycles and pedestrians is “less than significant” (DEIR 4.12-63), yet the analysis was for impacts on vehicular trips only. The DEIR did not analyze the impact of adding 3,250 new housing units and attendant vehicle trips on the safety, access and convenience of bicyclists and pedestrians traveling in and around the downtown. Without a proper analysis of impacts on bicycles and pedestrians, the claims of the SAP that impacts are “less than significant” are not supported.

Please address the future impacts of not accommodating bicycles with the planned class II bicycle lanes.

While discussing the separate needs of pedestrians and bicycles, the two are lumped together for assessing current traffic volume (Fig 4.12-5). This defeats any effort to assess the separate impacts upon those constituencies. If the baseline assumption improperly lumps them together, then any conclusions may not be supported.
Comment Letter 6


14-1: This comment does not question the adequacy of the Draft EIR, but rather provides a general opinion on the Specific Plan and the Draft EIR in regards to planned improvements for pedestrian and bicycle circulation. Comment is noted and no further action is required with regard to the Draft EIR.

14-2: This comment does not question the adequacy of the Draft EIR, but rather reiterates the Specific Plan's and Draft EIR's goal in creating a multi-modal environment for all Santa Rosa citizens to enjoy. No further action is required with regard to the Draft EIR.

14-3: This comment does not question the adequacy of the Draft EIR, but rather reiterates the goals and policies from the City's General Plan sited within the Draft EIR. The comment goes further by providing general opinions on the effects of the Specific Plan on pedestrian and bicycle circulation, as well as the lack of bicycle parking, within the Plan Area. Comment is noted and no further action is required with regard to the Draft EIR.

14-4: This comment disagrees with the Draft EIR's conclusions regarding the impacts from the Specific Plan on bicycle and pedestrians traveling in and around the downtown, questioning the "less than significant" statement in regards to these modes of transportation.

The Specific Plan proposes to redesignate a number of planned Class II bicycle lane facilities identified in the City's Bicycle and Pedestrian Master Plan to Class III bicycle routes. The impacts of these changes have been fully considered and are the result of a more thorough analysis than was possible in the original Bicycle and Pedestrian Master Plan. The proposed changes to planned Class II (on street) lanes are based on a number of factors. First, it was concluded that right-
of-way constraints requiring acquisition of additional right-of-way and possible demolition of existing historic structures made installation of even minimally-acceptable bike lanes problematic. Second, it was concluded that the alternative of removing existing on-street parking (in place of right-of-way acquisition) to accommodate installation of Class II bicycle lanes would create/exacerbate spill-over parking conditions in adjacent neighborhoods that could negatively impact neighborhood livability. Other impacts associated with the removal of existing on-street parking include: encouragement of higher vehicle speeds, diminished pedestrian comfort level attributable to removal of a physical buffer (parked vehicles) between the sidewalk and moving vehicles, design challenges to providing shorter crossing distances at intersections through the use of bulb-outs and potential impacts to the viability of existing and future businesses along the Wilson Street corridor. The removal of parking would also have potentially-adverse impacts of adjacent residential uses, particularly in historic neighborhoods where homes have no garages and on-street parking is the only option. Last, proposed changes to planned Class II routes within the Specific Plan Area are only proposed in areas where reasonable alternatives for accommodating bicycle travel have been identified. In no case does the Specific Plan proposes to redesignate planned Class II bicycle lanes for the purpose of providing additional vehicle travel capacity.

In summary, the potential impacts associated with elimination of the potential on-street-lanes are considered to be less-than-significant given the urban nature and low-speed street environment that will be created by the Specific Plan, in addition to the presence of off-street facilities such as the SMART path and Prince Memorial Greenway path that are (and will continue to be) superior to those found in the downtowns of most cities.

Further, all streets within the Specific Plan Area are envisioned to have vehicle speeds of 25 miles per hour or less, either through de-
sign or, for corridors such as Third Street and Santa Rosa Avenue, through traffic congestion that is typical of urban environments. Most bicyclists feel comfortable riding on streets where traffic is slow-moving, in many cases being able to ride at similar speeds to the motorized vehicles who are sharing the same space.

The Specific Plan will, by design, add a large number of pedestrians and bicyclists to downtown Santa Rosa. Given the existing and planned facilities that would exist at buildout, in addition to consideration of the low-vehicle speed street environment, no adverse or significant impacts to these users have been identified. No further action is required with regard to the Draft EIR.

14-5: This comment requests that the Draft EIR assess separate impacts of bicycles and pedestrians in regards to traffic volume, versus combining them, as shown on Figure 4.12-5. The figure referenced in the comment does separate bicycle and pedestrian volumes. The “turning movement” volumes represent bicyclists making left, through, or right turn movements for each approach. The arrows shown in crosswalk locations represent the number of crossing pedestrians on each approach. No further action is required with regard to the Draft EIR.

14-6: This comment indicates that citizens are uncomfortable riding on City streets because of high vehicle speeds and that the Specific Plan exacerbates this condition by not providing all of the potential on-street bike lanes shown in the Bicycle and Pedestrian Master Plan. As indicated in the response to Comment 14-4, vehicle speeds within the Plan Area are envisioned to be relatively low on all streets, certainly lower than currently exist on arterial corridors or even many collector streets outside of the Plan Area. Given the expected low speed differentials between vehicles and bicyclists, no adverse impacts to either motorized vehicle or bicycle circulation would be expected. No further action is required with regard to the Draft EIR.
The proposed General Plan 2035 is a focused update of the existing General Plan 2020, which was last updated in 2002. The update focuses on the *Housing Element*, incorporates policies of recent planning documents, and includes policies regarding climate protection in a document with a horizon year of 2035. Other element policies were updated to a lesser extent to reflect changes that have occurred in the city since the adoption of the General Plan 2020.

The proposed General Plan 2035 would be implemented through the city’s zoning code standards and design review to promote controlled housing growth to meet regional housing needs. If all the vacant land within the Urban Growth Boundary were developed, a 2035 population of approximately 233,520 residents within the Urban Growth Boundary would result.

### B. Relationship to Previous Environmental Documents

The General Plan 2035 incorporates significant policy direction from other plans to provide users important information in one document. Policy references from the following plans are included in the General Plan 2035 and in this document:

- Bicycle and Pedestrian Master Plan (included in this EIR)
- Citywide Creek Master Plan
- Downtown Station Area Specific Plan
- Economic Sustainability Strategy
- Greenhouse Gas Emission Reduction Action Plan
- Northern Downtown Pedestrian Linkages Study
- Recreation and Parks General Plan Amendment
- Sebastopol Road Urban Vision and Corridor Plan
- Southeast Area Plan
- Southwest Area Plan

The Southeast and Southwest Area Plans will be superseded with the adoption of the General Plan 2035.

### C. Environmental Impacts and Mitigation Measures

Potentially significant environmental impacts of the proposed project are summarized in Table 2-1. This table lists impacts and mitigation measures in three major categories: significant impacts that would remain significant even with mitigation (significant and unavoidable); significant impacts that could be mitigated to a less than significant level (significant but mitigable); and impacts that would not be significant (less than significant). For each significant impact, the table includes a summary of mitigation measure(s) and an indication of level of significance after implementation of mitigation measures. A complete discussion of each impact and associated mitigation measure is provided in Chapter 4, *Environmental Setting, Impacts, and Mitigation Measures*. 
GOALS AND POLICIES

Each element of the General Plan is organized to provide a short statement of existing conditions and vision, followed by goals and policies. In some instances, commentary is also included.

- Goals present broad policy direction; a larger end-state the city is hoping to achieve.

- Policies provide more specific direction on how to achieve goals. Policies outline actions, procedures, programs, or techniques to attain the goals. Some policies include quantitative statements that can be implemented by city staff.

- Commentary below some policies simply provides further discussion of and potential implementation for the policy statement.

1-6 RELATIONSHIP TO OTHER DOCUMENTS

Santa Rosa 2035 incorporates significant policy direction from other plans to provide users important information in one document. Policy references from the following plans are included in this document:

- Bicycle and Pedestrian Master Plan
- Citywide Creek Master Plan
- Downtown Station Area Specific Plan
- Economic Sustainability Strategy
- Greenhouse Gas Emission Reduction Action Plan
- Northern Downtown Pedestrian Linkages Study
- Recreation and Parks Business and Strategic Plan
- Sebastopol Road Urban Vision and Corridor Plan
- Southeast Area Plan
- Southwest Area Plan

The Southeast and Southwest Area Plans are superceded with the adoption of this plan. The remainder of above-noted plans should be consulted for more detailed information than provided in Santa Rosa 2035.

As part of General Plan preparation, several technical studies were conducted to document environmental conditions, analyze prospective land use alternatives and identify mitigation measures for potential environmental impacts. Although studies prepared for the General Plan update have guided Plan preparation, they do not represent adopted City policy.
serving open space. Public plazas and gathering spaces are generally developed at the same time that land uses are developed at an urban scale. They are generally privately owned, but are publicly accessible.

Larger open space areas in the city are generally developed in association with agencies such as the Sonoma County Agricultural Preservation and Open Space District and the Sonoma County Water Agency under joint acquisition and maintenance agreements. Open space lands are set aside for a variety of purposes such as watershed and resource protection. These areas have few improvements but generally allow some public access, primarily for passive recreation such as hiking and wildlife viewing. These areas are counted as part of the standard of 1.1 acres of public-serving open space per 1,000 residents indicated above.

Twenty-seven Over—30 neighborhood and community park sites are proposed to serve the city’s growing population, as illustrated in Figure 6-1, and listed in Table 2-4 in the Land Use and Livability Element; however, these projected locations are not site specific, they merely indicate a park is needed in the vicinity. Assuming development of all undeveloped and proposed park facilities within the 20 25-year General Plan timeframe five community parks and 30 neighborhood parks the city’s parks and recreation facilities will total 864 acres (see Table 6-3). Based on a 2020 2035 population of 195,300 233,520 the city parks portion of the standard will be 8 3.7 acres of parks per 1,000 residents. The parks ratio exceeds the city standard due to two proposed large recreational amenities that are being expanded: Youth Community Park and the addition of A Place to Play.

In addition to neighborhood and community parks, Santa Rosa has two community centers, two aquatic facilities, Bennett Valley Golf Course, and the Senior Center on Bennett Valley Road, all of which offer a wide variety of sports and recreation programs. Table 6-4 illustrates the city’s community and recreational facilities.

Specific recreational needs include more youth athletic fields, an additional aquatic facility, a skate park on the
### Table 6-1: Existing Neighborhood and Community Parks, 2008

<table>
<thead>
<tr>
<th>Park</th>
<th>Acreage</th>
<th>Park</th>
<th>Acreage</th>
<th>Park</th>
<th>Acreage</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Place to Play</td>
<td>30.0</td>
<td>Haydn Park</td>
<td>0.3</td>
<td>Peterson Lane Park</td>
<td>5.0</td>
</tr>
<tr>
<td>Bayer Park</td>
<td>6.0</td>
<td>Hidden Valley Park</td>
<td>8.0</td>
<td>Pioneer Park</td>
<td>5.0</td>
</tr>
<tr>
<td>Bellevue Park</td>
<td>3.4</td>
<td>Howarth Community Park</td>
<td>152.0</td>
<td>Prince Memorial Greenway Phase I &amp; II</td>
<td>3.8</td>
</tr>
<tr>
<td>Bicentennial Park</td>
<td>6.0</td>
<td>Humboldt Park</td>
<td>0.5</td>
<td>Railroad Park</td>
<td>0.5</td>
</tr>
<tr>
<td>Bredon Park</td>
<td>2.0</td>
<td>J.X. Wilson Park</td>
<td>5.0</td>
<td>Rae Street Park</td>
<td>0.5</td>
</tr>
<tr>
<td>Brush Creek Park</td>
<td>3.0</td>
<td>Jacobs Memorial Park</td>
<td>8.0</td>
<td>Redhawk Park</td>
<td>0.3</td>
</tr>
<tr>
<td>Luther Burbank Gardens</td>
<td>1.5</td>
<td>Jennings Park</td>
<td>6.0</td>
<td>Rincon Valley Community Park</td>
<td>25.0</td>
</tr>
<tr>
<td>Coffey Park</td>
<td>5.0</td>
<td>Julliard Park</td>
<td>9.0</td>
<td>Rinconada Park</td>
<td>3.0</td>
</tr>
<tr>
<td>Colgan Creek Park</td>
<td>3.0</td>
<td>Live Oak Park</td>
<td>5.0</td>
<td>Rincon Ridge</td>
<td>11.0</td>
</tr>
<tr>
<td>Cook Park</td>
<td>1.0</td>
<td>Martin Luther King Jr Park</td>
<td>8.0</td>
<td>Skyhawk Park</td>
<td>18.0</td>
</tr>
<tr>
<td>DeMec Park</td>
<td>1.0</td>
<td>Matanzas Park</td>
<td>1.0</td>
<td>Skyhawk Village</td>
<td>0.5</td>
</tr>
<tr>
<td>DeTurk Park</td>
<td>1.0</td>
<td>Mesquite Park</td>
<td>5.0</td>
<td>Sonoma Avenue Park</td>
<td>2.0</td>
</tr>
<tr>
<td>Doyle Community Park</td>
<td>22.0</td>
<td>Nagasawa Community Park at Fountaingrove</td>
<td>10.0</td>
<td>South Davis Park</td>
<td>1.0</td>
</tr>
<tr>
<td>Dutch Flohr Park</td>
<td>2.0</td>
<td>Nielsen Park</td>
<td>5.0</td>
<td>Southwest Community Park</td>
<td>19.0</td>
</tr>
<tr>
<td>Eastside Park</td>
<td>0.5</td>
<td>North Park</td>
<td>1.0</td>
<td>Steele Lane Park</td>
<td>3.0</td>
</tr>
<tr>
<td>Finley Community Park</td>
<td>22.0</td>
<td>Northwest Community Park</td>
<td>25.0</td>
<td>Strawberry Park</td>
<td>4.0</td>
</tr>
<tr>
<td>Fir Ridge Park</td>
<td>1.0</td>
<td>Oak Lake Green Park</td>
<td>7.0</td>
<td>Tanglewood Park</td>
<td>8.0</td>
</tr>
<tr>
<td>Franklin Community Park</td>
<td>13.0</td>
<td>Old Courthouse Square</td>
<td>2.0</td>
<td>Trailhead Park</td>
<td>1.0</td>
</tr>
<tr>
<td>Fremont Park</td>
<td>2.0</td>
<td>Olive Park</td>
<td>1.0</td>
<td>Village Green Park</td>
<td>1.5</td>
</tr>
<tr>
<td>Galvin Community Park</td>
<td>22.0</td>
<td>Pearblossom Park</td>
<td>2.9</td>
<td>Westgate Park</td>
<td>3.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Peter Springs Park</td>
<td>1.0</td>
<td>Youth Community Park</td>
<td>6.0</td>
</tr>
<tr>
<td><strong>Total Existing Parks</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>531.15</strong></td>
</tr>
</tbody>
</table>

*Source: City of Santa Rosa Recreation and Parks Department*

### Table 6-2: Undeveloped Parkland, 2008

<table>
<thead>
<tr>
<th>Undeveloped Parkland</th>
<th>Acreage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Center East</td>
<td>3.7</td>
</tr>
<tr>
<td>Dauenhauer Park</td>
<td>2.3</td>
</tr>
<tr>
<td>Harvest</td>
<td>3.5</td>
</tr>
<tr>
<td>Nagasawa Community Park at Fountaingrove</td>
<td>23</td>
</tr>
<tr>
<td>A Place To Play</td>
<td>53</td>
</tr>
<tr>
<td>Prince Gateway Park</td>
<td>0.5</td>
</tr>
<tr>
<td>Thomas Lake Harris Drive</td>
<td>8</td>
</tr>
<tr>
<td>Upper Brush Creek</td>
<td>10</td>
</tr>
<tr>
<td>Youth Community Park expansion</td>
<td>66</td>
</tr>
<tr>
<td><strong>Total Undeveloped Park Acreage</strong></td>
<td><strong>170</strong></td>
</tr>
</tbody>
</table>

*Source: City of Santa Rosa Recreation and Parks Department*
Letter 6. West End Neighborhood Association
(Lea M. Barron-Thomas, President)

6-1 As stated in Chapter 2 under Staff Initiated Changes to the Draft EIR, the Bicycle and Pedestrian Master Plan (BPMP) has been removed from inclusion in this EIR. Bicycle facilities on Wilson Street will be further defined in the Bicycle and Pedestrian Plan which should be available for public review in 2009.

6-2 The Final EIR for the Downtown Station Area Specific Plan was certified (State Clearinghouse number 2006072104) by the City of Santa Rosa City Council on October 9, 2007 (Resolution No. 26949). The Downtown Station Area Specific Plan and its corresponding Final EIR are not part of this EIR analysis. The Specific Plan EIR necessarily and appropriately analyzes impacts related to implementation of that plan in more detail than is possible in this General Plan EIR, which analyzes citywide impacts.

6-3 It is unlikely that there is a need for the acquisition of additional right-of-way and possible demolition of historic structures or removal of parking on Wilson Street to accommodate bicycle facilities as a Class III bicycle route is proposed for the street. However, as noted in response to comment 4-5, transit stops would require the removal of parking spaces near the La Rose Hotel in order to be ADA compliant. Further, as stated in response to comment 6-1, the BPMP has been removed from inclusion in this EIR which will further define future bicycle facilities on Wilson Street.

6-4 The Bicycle and Pedestrian Master Plan has not been published for public review at the time of publication of this Final EIR. See Chapter 2 under Staff Initiated Changes to the Draft EIR related to the removal of the BPMP from this EIR.

6-5 As the proposed Bicycle and Pedestrian Master Plan is not included in this EIR it will require separate environmental review.

6-6 Table 4.P-1 of the Draft EIR identifies the one-acre DeTurk Park as an existing park in the City of Santa Rosa. Draft EIR Section P, Parks and Recreation, states that implementation of the General Plan 2035 would ensure that sufficient parks, school playground, and open space areas are provided to meet city standards, thereby reducing the potential impact on parks and recreation facilities to a less than significant level. Therefore, no significant impacts related to parks or recreation, or to the DeTurk Round Barn in particular, are anticipated. As no physical changes to the DeTurk Round Barn, in particular, are planned under the General Plan 2035, no significant impacts to historic resources (including its listing in the National Register of Historic Places), traffic, or noise are anticipated.

6-7 The status of DeTurk Round Barn Park remaining a neighborhood park is not a CEQA issue and does not directly address the adequacy or accuracy of the Draft EIR.
6-8 The status of DeTurk Round Barn Park remaining a neighborhood park and the use as a community center is not a CEQA issue and does not directly address the adequacy or accuracy of the Draft EIR.

6-9 Parks, including neighborhood parks, are discussed in section 4.P, Parks and Recreation of the Draft EIR. Parks and Recreation are discussed in Chapter 6 of the proposed General Plan 2035. As stated on page 6-2 of the General Plan 2035, parks less than two acres are supported by the City, as they provide access to the wider network of parklands. The formal name of these small parks is not a CEQA issue and does not directly address the adequacy or accuracy of the Draft EIR.

6-10 A general plan amendment was approved by the City Council on November 18, 2008, making various changes to ensure consistency with the Recreation and Parks Business and Strategic Action Plan. Changes in the Public Services and Facilities Element, related to parks, including Table 6-4, were generally part of this amendment package, and are part of the existing General Plan.
RE: General Plan Update.

Dear Ms. Kranz,

Thank you for this opportunity to comment on the DEIR for the city's current general plan update. Because I am in contact with the California Department of Fish and Game, as well as other regulatory agencies, I am informed of the presence of at least two protected endangered species in the vicinity of the old Naval Air Center, specifically there are occurrences of the California Tiger Salamander and the Limnanthis flower on an area of land known as Ryan's Place, currently proposed for development. I see that these occurrences have not been noted by the city's EIR consultant; neither has the city produced a significant strategy for these species and therefore must provide mitigation for their occurrences.

I hope this information will prove useful to you.

Yours,

Donna Strom

2730 Ash Drive

Santa Rosa, Ca. 95407-7325

cc Liam Davis Department of Fish and Game
Letter 7. Donna Strom

7-1 The Draft EIR considered the presence of several California tiger salamander occurrences in South West Santa Rosa, most (but not all) of which are south of Highway 12 and west of Stony Point Road, as shown in Figure 4.F-1. This area is part of the Santa Rosa Plain, and Mitigation Measure 4.F-5 is designed to reduce impacts to this species and four endangered plant species, including the Sebastopol meadowfoam (*Limnanthes vinculans*), by incorporating mitigation measures in the Santa Rosa Plain Conservation Strategy and USFWS Biological Opinion for the Conservation Strategy by reference. In addition, if a specific development project occurs in this area, these specific projects will undergo environmental review, and additional analysis and mitigation on potential impacts to the California tiger salamander will occur at that time.
May 7, 2009

Mr. Troy Eggleston
Department of Community Development
City of Santa Rosa
P.O. Box 1678
Santa Rosa CA 95402

Re: City of Santa Rosa General Plan Draft EIR

Dear Mr. Eggleston:

Thank you for the opportunity to review the City of Santa Rosa’s General Plan Draft EIR 2035. Although the public review period for this document has expired, the Sonoma County Water Agency (Agency) would still like the opportunity to submit the following comments for your consideration. Our suggested revisions are indicated by strikeout text for deletions and underline text for additions. We also provide general comments that may help the City describe some of the complex water supply, flood control, and environmental characteristics of its planning area.

G. Utilities and Service Systems

1. On page 4.G-1, the last sentence of the third paragraph should read, “Although there are no legal constraints to the SCWA’s ability to use groundwater supplies, the amount of groundwater expected to be pumped by the agency is projected to remain stable between 2010 and 2030, at 3,820 [3,870] acre-feet/year.”

2. On page 4.G-1, the second sentence of the fourth paragraph should read, “Two wells were converted from emergency to active status in July 2005 and can provide up to 2,300 [2,300] acre feet per year (ac-ft/year) of supply.”

3. On page 4.G-2, under “Wholesale Water Rights and Supply,” the second sentence should read, “In combination, the limit on annual diversion is currently a maximum of 92 [75] mgd or 75,000 [180] acre feet annually (October 1st to September 30th) with a maximum diversion rate of 180 cubic feet per second.” Please note that the 92 mgd figure relates to capacity of the Agency’s transmission system, but is not a water right permit limitation.

4. On page 4.G-3, please delete the third sentence in the first paragraph. The statement is misleading because the initial ruling by the Sonoma County Superior Court was appealed.
In addition, there are many other factors that affect the Agency’s ability to meet the delivery limits specified in its water supply agreements. Please also note that the Restructured Water Supply Agreement has replaced the Tenth and Eleventh Amended Agreements for Water Supply.

5. On page 4.G-3, the fourth sentence of the first paragraph should read, “In May 2003, the Court of Appeals reversed the trial court’s initial decision, concluding that the EIR was inadequate because it did not contain certain cumulative impacts and alternatives analyses....”


7. On pages 4.G-4 through 5, under “NMFS Section 7 Determination, trout” should be changed to The last sentence of this discussion should be changed to read, “It is expected that the increased decreased flows required by these measures would still provide enough water for the SCWA’s diversion to meet existing water demand.” This sentence may be correct in terms of annual deliveries, but the text of this paragraph should be revised to reflect that the Biological Opinion imposes limitations on summertime flows in Dry Creek. These limitations may affect the Agency’s ability to meet peak summer demands in most years.

8. On page 4.G-5, the text under “Inflatable Dams in the Russian River,” should be revised to reflect that there is only one inflatable dam operated by the Agency.

9. On pages 4.G-5 through 6, the text under “Future Operations of the Potter Valley Project,” mentions that PVP diversions from the Eel River into the Russian River have been reduced by approximately 33%. Please also describe the effects of these reductions.

10. On page 4.G-8, under “Sonoma County Water Agency,” the first sentence of the second paragraph is incorrect. The Water Code does not require the Agency to develop an UWMP for its contractors nor describe their local supplies, water use, conservation, or reclamation. The text in this section should also be revised to reflect that in October 2008, the Sonoma County Superior Court issued a decision finding that certain elements of the Agency’s UWMP 2005 did not comply with statutory requirements. The Agency filed an appeal to this decision in January 2009.

11. On page 4.G-9, under “Impact 4.G-1,” the second to last sentence should be modified to state that in January of 2007, the City of Santa Rosa (City) reviewed the Agency’s UWMP 2005 demand projections, which was used as a basis for the City’s 2005 UWMP. The City found that the UWMP demand projections for the Agency and City to be consistent with one another.

13. Under the discussion for Impact 4.G-1, it is unclear how a conclusion of “less than significant” can result from your analysis in light of the numerous uncertainties facing the Agency’s water supply that are described in the preceding pages of the Draft EIR. The Agency is currently unable to meet the City’s current annual delivery limit of 29,100 acre-feet per year specified in the existing Restructured Agreement for Water Supply. Proposed future supply quantities are uncertain until the environmental review process for the Water Project EIR is complete. Although the Draft EIR was released for public review in December 2008 and the review period has closed, the Agency has not budgeted funding for Fiscal Year 2009-2010 to prepare a Final EIR. There is not a schedule for completing this work. Therefore, for the foreseeable future, the Agency’s diversions from the Russian River will be limited to those allowed by its existing water right permits from the SWRCB; 75,000 acre-feet per year. The Agency will be working with the water contractors over the next several months to fairly allocate this existing supply. As you are aware, it will be critical for all water contractors to maximize water conservation savings and balance Russian River supplies with local surface, groundwater, and recycled water supplies. These constraints, together with the transmission system impairment, the changes in operations of the Potter Valley Project, and the limitations imposed by the terms and conditions of NMFS’s Biological Opinion, should be clearly stated in the discussion of this impact. Given these clearly identified constraints on the Agency’s water supply, the analysis and determination of significance of Impact 4.G-1 in the City’s Final EIR should be revised as appropriate based on updated demand estimates and available supplies.

F. Biological Resources

14. The described setting for riverine habitat is accurate but could be improved by educating readers about the ecological differences among streams in Santa Rosa’s planning area. The second paragraph on Page 4.F-7 suggests that warm water fish species are indicative of degraded stream conditions. Despite the effects of habitat degradation, the community of aquatic organisms in streams of the Santa Rosa plain changes naturally from low to high gradient reaches. While steelhead habitat exists in many streams, upper stream reaches closer to the foothills are more likely to provide steelhead rearing habitat than downstream channelized reaches on the valley floor. Due largely to natural watershed characteristics, improvements to habitat in downstream channelized reaches are unlikely to create conditions that support steelhead rearing. However, there is ecological value in providing habitat for native warm water species, such as California roach and Sacramento sucker, in the lower stream reaches. The Agency has been collecting fish population and habitat data in Santa Rosa area streams for several years and can provide reports for reference upon request.

15. On page 4.F-7, third paragraph, please note that roach in the Russian River basin should be referred to as “Clear Lake-Russian River roach.”


17. On page 4.F-7, the fifth sentence of the third paragraph reads, “Chinook salmon were recently observed in Santa Rosa Creek (City of Santa Rosa, 2007b).” Please note that Chinook salmon spawn in Santa Rosa Creek ephemerally. Spawning adults have been observed in years with
early fall rain (e.g., 2002 and 2007). However, in years with later rainfall Chinook are unable to access spawning habitat.

18. Please note that on page 4.F-12, Table 4.F-1 lists Russian River Tule perch, Navarro roach, and River lamprey, as federal species of concern but they are not discussed in the text.

H. Hydrology and Water Quality

19. On page 4.H-3, last paragraph under the Setting section “Surface Water Quality” states that Sonoma County’s surface water quality is monitored by the North Coast Regional Water Quality Control Board. Please note that the Petaluma River Basin and Sonoma Creek which are part of Sonoma County, are under the authority of the San Francisco Bay Regional Water Quality Control Board.

20. On page 4.H-6, under section titled “Sonoma County Water Agency Flood Control Design Criteria”: The following statements should be modified as follows, “In compliance with SCWA FCDC, all culverts and drainage systems must be designed to accommodate the runoff from a 25-year recurrence interval storm event and safely pass the 100-year recurrence interval storm event underground storm drains must be designed to carry flows expected from a 10-year storm. The design of bridges, culverts, and open waterways should be based on watershed size.” However, compliance with this Design Criteria does not provide assurance that flooding will not occur and will not, by itself, mitigate all flooding risks.

21. On page 4.H-6, third paragraph, last sentence please replace, “In addition, SCWA is in the process of revising and updating the FCDC to reflect a lower impact approach include a low impact development (LID) approach.”

Thank you for the opportunity to comment. For additional questions or comments, please contact Environmental Specialist Connie Barton at 547-1905 or email at Connie.Barton@scwa.ca.gov.

Sincerely,

Renee T. Webber
Division Manager,
Environmental Resources and Public Affairs

c Jennifer Burke, City of Santa Rosa
Water Agency Board of Directors
Grant Davis, Gill Golis, Jay Jasperse, Pam Jeane, Jon Nichaus, David Manning, Erica Phelps, Randy Poole, Steve Shupe, Cordel Stillman, Mike Tovani, Renee T. Webber

RW\files\server\data\clpinks\week050409\or deir gp 2035 water supply comments.doc

4-44
Letter 8. Sonoma County Water Agency

8-1 The Draft EIR has been modified to reflect that 3,870 acre-feet per year of groundwater is projected to be pumped by the Sonoma County Water Agency between 2010 and 2030 (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-2 The Draft EIR has been modified to reflect that 2,300 acre feet per year can be provided by the two wells that were converted from emergency to active status in July 2005 (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-3 The Draft EIR has been modified to clarify the maximum limit on annual diversion (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-4 The paragraph states facts and describes the history of the Water Supply and Transmission System Project. Water Supply Agreements are cited appropriately and reference to the Restructures Agreement as the current water supply agreement is provided on page 4.G-2, paragraph 2 and 4.G-4, paragraph 3.

8-5 The Draft EIR has been modified to state that in May 2003, the Court of Appeals reversed the trial court’s initial decision, concluding that the EIR was inadequate because it did not contain certain cumulative impacts and alternatives analyses, and its environmental setting description was deficient (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-6 The Draft EIR has been updated to reflect the fact that Collector 6 has been constructed and is operational (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-7 The Draft EIR has been modified to address SCWA’s ability to meet peak summer demands despite reduced flows in Dry Creek as imposed by “NMFS Section 7 Determination, trout” (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-8 The Draft EIR has been modified to reflect the fact that the SCWA has one rubber dam (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-9 The comment requests that additional information be provided on the Potter Valley Project. The description in the Water Supply Assessment for Santa Rosa General Plan 2035 and in the DEIR is based on the latest information available on the Potter Valley Project.

8-10 The DEIR has been modified to reflect that the Water Code does not require the Agency to develop and UWMP for its contractors. The DEIR was also modified to reflect that in October 2008, the approval of the SCWA 2005 UWMP was vacated by the Sonoma County Superior Court on findings that certain elements did not meet statutory requirements, but that these elements do not affect the validity of the dry year analysis.
4. Written Comments on the Draft EIR and Responses to Comments

that was referenced by the Water Supply Assessment for Santa Rosa General Plan 2035 (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-11 The City used the demand projections for the City of Santa Rosa prepared by the SCWA’s consultant as a basis for the City’s 2005 Urban Water Management Plan (UWMP). The City did not use the SCWA’s 2005 UWMP demands as a basis for the City’s 2005 UWMP. In January 2007, the City reviewed the Agency’s 2005 UWMP and found it to be consistent with the City’s 2005 UWMP. However, the suggested language requested by the Agency is not correct; therefore, no text changes are made to the DEIR in response to this comment.

8-12 The comment requests that the word “entitlement” be replaced with the term “annual delivery limit” in the discussion on page 4.G-10, under “Additional Wholesale Water Supply.” Per Section 3.1 of the Restructured Agreement for Water Supply, contractor water supply is defined as entitlements. Change would be inconsistent with the language in the Restructured Agreement.

8-13 The comment questions the City’s conclusion of “Less than Significant” under “Impact 4.G-1: New development under the proposed General Plan 2035 would generate higher water demands than available through existing Sonoma County Water Agency and City of Santa Rosa entitlements. (Less than Significant).” The City’s conclusion remains valid for, among others, the following reasons:

- Santa Rosa’s water supply portfolio is made up of multiple sources of supply: SCWA entitlement, Santa Rosa’s groundwater, Santa Rosa’s recycled water, and water conservation that offsets current demands. This comment addresses only the SCWA entitlement supply.

- In the Water Supply Assessment for Santa Rosa General Plan 2035 (WSA) Santa Rosa limits its existing supply from SCWA to the current entitlement of 29,100 acre-feet per year (AFY). The expectation of delivery of this supply is based on the contractual provisions of the Restructured Agreement for Water Supply, including the stipulation of Section 3.5 of the Restructured Agreement that SCWA will at all times have a water shortage allocation methodology adopted sufficient to inform each customer of the water available to it in the event of a shortage. As stated on page 11 of the WSA, the Chair of the SCWA Board of Directors wrote to the City on April 18, 2006, addressing the Section 3.5 allocation methodology adopted by the SCWA as follows: “Under this allocation methodology, if the Agency’s surface water rights and supply remain limited to 75,000 afy for some time, and the water contractors demands reach their maximum entitlements from the Agency, the City’s allocation would be 29,100 afy.”

- This comment states there are numerous uncertainties regarding SCWA’s ability to meet Santa Rosa’s current entitlement of 29,100 AFY because SCWA’s current water right permits limit Russian River diversion to 75,000 AFY. These uncertainties are discussed in detail in the WSA Section 2.4.5-Conditions Which Could Affect SCWA Existing and Planned Supply (WSA pages 10-14). Based upon the applicable allocation methodology, the current 75,000 AFY diversion limitation still provides the full entitlement of 29,100 AFY to Santa Rosa.
4. Written Comments on the Draft EIR and Responses to Comments

8-14 The comment elaborates on the description of the riverine habitat and is noted.

8-15 The Draft EIR has been modified to reflect the correct name of the Clear Lake-Russian River roach (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-16 The Draft EIR has been modified to reflect the correct name of the fathead minnow (*Pimephales promelas*), (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-17 The Draft EIR has been modified to clarify that, while spawning adults have been observed in the Santa Rosa creek in years with early fall rain, in years with later rainfall Chinook are unable to access spawning habitat (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-18 The Draft EIR has been modified to reflect that other special-status fish, such as the Russian River tule perch (a California Species of Special Concern), may be present in the Planning Area (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-19 The Draft EIR has been modified to clarify that the Petaluma River Basin and Sonoma Creek are under the authority of the San Francisco Bay Regional Water Quality Control Board (see Chapter 2, Changes to the Draft EIR in Response to Comments).

8-20 In compliance with the SCWA FCDC, all culverts and drainage systems must be designed to accommodate the runoff from a 25-year recurrence interval storm event and safely pass the 100-year recurrence interval storm. Underground storm drains must be designed to carry flows expected from a 10-year storm. The design of bridges, culverts, and open waterways should be based on watershed size (although this does not guarantee that flooding will not occur, nor necessarily mitigate all flooding-related risks).

8-21 The Draft EIR has been modified to state that the SCWA is in the process of revising and updating the FCDC to include a low impact development (LID) approach (see Chapter 2, Changes to the Draft EIR in Response to Comments).
CHAPTER 5
Responses to Comments at the Planning Commission Public Hearings on the Draft EIR

The Planning Commission held two public hearings on the Draft EIR (DEIR) on April 2 and April 23, 2009. The following is a summary of comments received at the public hearings, followed by responses that address those topics. Most of the topics raised have been previously responded to in Chapter 4 (Written Comments on the Draft EIR and Responses to Comment).

A. Environmental Topics Raised and Responses to Comments from April 2, 2009 Hearing

The following comments were made at the Planning Commission public hearing on the Draft EIR on April 2, 2009:

Planning Commission Chair Vicki Duggan

Comment: Didn’t see anything in regards to the installation of the Courthouse Square in Downtown and the realignment of Mendocino/Santa Rosa Ave.

Response: The current and Draft General Plan 2035 show Courthouse Square unified, with Santa Rosa Avenue and Mendocino Avenue beginning at 3rd and 4th Streets. The City held a design competition and has retained a designer who has completed design and development plans for this project, which are now under review by the City.

Comment: pg. 4.C-6 “Mode Share” – What is it based on?

Response: The mode share data outlined on page 4.C-6 of the Draft EIR is based on the Census 2000 journey-to-work data.

Comment: pg. 4.C-6 estimates about two percent of ridership through bikes, but on pg. 4.C-22 it says bikes make up one percent of ridership. Shouldn’t these be the same?

Response: The first reference is from the American Community Survey (ACS) in 2007, and the other is from the Census 2000. Both are products of the Census Bureau. In addition to being conducted in different years, the ACS and the decennial Census have differences in sampling size and methodology, which make it unclear if the change is a trend, or is
statistically insignificant. The text has been updated to show a range of 1 to 2 percent for cycling commuting purposes (see Chapter 2, Revisions to the Draft EIR).

Comment: In the 1998 Commuter Info: Is telecommuting taken into consideration?

Response: The 1998 Commuter Information model does not predict telecommuting. The Census does have information on those who say they worked at home most of the time.

Comment: In some cases data is from 2002 or later [shouldn’t this be earlier?]. Is this information out of date?

Response: Later data may be available in some cases, but was not thought to be significantly different than the information presented.

Comment: Table 4.C-1: Why is Santa Rosa Avenue and Burt Street labeled as a “Class IV”’? I highly doubt that there is that much pedestrian traffic.

Response: Santa Rosa Avenue and Burt Street were labeled as Class IV, primarily to be consistent with other studies (e.g., traffic studies, EIRs) completed for the City. The classification is typically reviewed with the City’s Traffic Engineering Division, and has to do with the high frequency of driveways, traffic signals, and other “friction” along this portion of Santa Rosa Avenue.

Comment: Table 4.C-3: Does this highway traffic model include the widening of Highway 101?

Response: The data were obtained from work sheets provided by Parsons Transportation Group on the Highway 101 Widening projects, and were taken immediately after the opening of the High Occupancy Vehicle (HOV) lanes.

Comment: pg. 4.C-3: Strike the word “Some” from the footnote. She doesn’t believe that bike paths are specifically for bikes only.

Response: The edit was made under staff initiated changes to the Draft EIR (see Chapter 2).

Comment: pg. 4.C-10: Is there more updated information that can be used rather than reference the 1990 MTC survey?

Response: MTC’s Regional Travel Characteristics Report from 2000 provides newer data, but is not precisely comparable with the 1990 survey. The 2000 survey found that the median walking trip on weekdays took just under 15 minutes, while two-thirds of bicycle trips were 30 minutes or less; weekend bicycle trips (presumably largely for recreation) were somewhat longer.
Comment: pg. 4.C-12: There seems to be no discussion for the change of bus routes to the implementation of SMART.

Response: Although informal discussions have taken place, no formal plan is yet available for changes of bus routes after SMART commences service. Further, there is no official plan for service coordination between the two transit operators yet, as SMART will not begin service until 2014 or 2015. Transit providers are generally reluctant to include bus routes in a general plan because there are changed more frequently than the General Plan is updated.


Response: This edit was made under staff initiated changes to the DEIR (see Chapter 2). The policy was amended by adding “…as well as rail service for commuting and other travel purposes.”

B. Environmental Topics Raised and Responses to Comments from April 23, 2009 Hearing

The following comments were made at the Planning Commission public hearing on the Draft EIR on April 23, 2009:

Duane DeWitt

Comment: The issues of the Roseland/Southwest Area of Santa Rosa are not adequately dealt with in this document.

Response: The Southeast and Southwest Area Plans were adopted by the City Council in June 1994. The Southeast Area Plan states, “The Plan is long-range, with build-out expected to occur over the next 10 to 15 years.” The Southwest Area Plan is less specific, stating “the time frame of the Area Plan is the same as those for the General Plan.” The general plan referenced is Santa Rosa 2010, adopted in 1991, and with a planning period to 2010. Staff has generally viewed these documents as plans with a 15 year planning period.

The area plans are long range documents which were adopted 15 years ago. Two updates to the general plan have occurred since their adoption. For this reason, it was determined that these plans should sunset through this focused update process, with important policy direction included in the general plan.
Staff reviewed each area plan to determine what policy direction should be brought forward to the draft general plan. Review focused on direction which was important to continue or which was not already reflected in the general plan. For the Southeast Area Plan, goals regarding the residential land use pattern and creating neighborhood focal points in the new shopping areas are included. Southwest Area Plan goals include land use patterns supportive of pedestrians, bicyclists, and rail travel as well as preservation of natural resources.

Comment: You should only approve the Housing Element; the rest of the plan is inadequate and it needs to wait. Impact 4-A-2: the SRGP2035 would result in conflicts with existing plans and policies adopted to avoid or mitigate environmental impacts. “This means the DEIR is inadequate?”

Response: As stated on page 4.A-9 of the Draft EIR, Impact 4.A-2, related to conflicts with existing plans and policies, was determined to have a less than significant impact on the environment. Implementation of the General Plan 2035 would implement policies and regulations that would ensure that conflicts with the existing plans and polices avoid or mitigate environmental impacts to a less than significant level.

Comment: pg 4.F-2: Oak Woodland; they do not mention the *Quercus lobata*, Valley Heritage Oak which is a big thing in Southwest Santa Rosa.

Response: Heritage trees, protected trees, and street trees are protected by the Santa Rosa City Code, Chapter 17-24, as described on pp. 4.F-30 - 4.F-31. In general, projects avoid significant heritage trees. Projects that cannot avoid these trees must apply for a permit, and follow specific tree relocation/removal requirements described in the City Code. Potential impacts that specific projects might have on the valley oak heritage tree in southwest Santa Rosa will be considered during the environmental review of the specific project, but not under this General Plan.

Comment: Tiger Salamander is a federally listed species, but where is it in the map that shows them on where they have been identified in the past along Burbank Ave? Is like they are all gone. No one’s done the assessments to know (whether they are there). They’re just acting like they are gone, or we’ll kill them and then they’ll be gone.

Response: Figure 4.F-1 only shows records of California tiger salamanders that are in California Department of Fish and Game’s California Natural Diversity Database (CNDDB), so it is possible, and indeed likely, that not all tiger salamander populations are represented on this map. The area along Burbank Ave is identified in the Santa Rosa Plain Conservation Strategy as “potential California tiger salamander range,” and within 1.3 miles of known or extirpated breeding pools.

This General Plan EIR is not intended to analyze impacts that specific projects could have on specific special-status species populations; if a specific project could potentially impact
California tiger salamander habitat, the project will incorporate applicable avoidance and mitigation measures described in the Santa Rosa Plain Conservation Strategy and the USFWS Programmatic Biological Opinion, as required under Mitigation Measure 4.F-5. However, as noted in this mitigation measure, these projects will also be evaluated individually, and not necessarily adhere to the exact ratios described in the Conservation Strategy.

**Comment:** There are other issues about traffic. No way to know if there will be enough water. And it all comes down to adequacy, and I believe this is inadequate based on what’s really going on in our community.

**Response:** The comment regarding the inadequate analysis of traffic and water is noted, however, the comment does not specifically request additional information or analysis.

**Comment:** Two minutes to assess 25 years is not sufficient; there needs to be a series of meetings – as was suggested by the Redevelopment Agency. Go with the Housing Authority.

**Response:** In July 2007, the City Council considered alternative program designs for the revision program and selected the least cost program identified as “Housing Element Focus” in order to limit expenditures. That program design did not include a citizen advisory committee or extensive outreach. The update was not intended to be comprehensive, but rather focus on three factors: 1) updating the housing element to comply with state law; 2) inclusion of policy from recently adopted plans that bore relationship to the general plan; and 3) addition of some policies relating to greenhouse gas reduction without development of a full general plan element. It was felt that less significant public involvement would be acceptable given the focused nature of the update and the extensive citizen involvement in the last general plan update in 2002.

Two stakeholder meetings were held prior to plan preparation, with the focus on the housing element. The first meeting was held to solicit comments on topics for inclusion in the housing element. Prior to the second meeting, background data prepared for the housing element was sent out, with comments requested at that meeting. A third meeting was held following release of the draft general plan to present it to the public and to invite comments. In addition, information developed during the program was posted on the website.

**Comment:** Inclusionary housing. One per every five units – it works in San Francisco, check with their inclusionary housing director.

**Response:** The comment regarding San Francisco’s inclusionary housing policy is noted.
Daisy Pistey-Lyhne (Greenbelt Alliance)

Comment: Wanted to reiterate many points that were in the Accountable Development Coalition’s letter. Wants to ensure that City adopts a density bonus that will bring Housing Element into compliance with state law. This is important; if it doesn’t happen, all funding from the state for affordable housing will cease. HCD will not approve the Housing Element without a density bonus. Include policies that will flexibly allow for affordable housing to be located throughout the city through public-private partnerships and there are some examples of policies in the Accountable Development Coalition’s letter that can do that, such as land dedication, air-rights dedication. Make sure that funding sources for affordable housing are diversified by increasing the percentage of redevelopment funds that go to affordable housing and also by putting into place a timeline and triggers that will lead to adoption of a jobs-housing linkage fee.

Response: As described on page 4.B-6 under Impact 4.B-1 of the Draft EIR, the proposed General Plan 2035 would not result in substantial population, housing, or employment growth in excess of local share of regional projections. Since the City can accommodate its “fair share allocation” of its more recent state-mandated Regional Housing Needs Allocation, in terms of housing, this impact is considered less than significant. Furthermore, the proposed General Plan 2035 includes goals and policies intended to minimize the effects of future housing needs including policies H-A and H-C in the proposed General Plan 2035, meet the housing needs of all Santa Rosa residents and expand the supply of housing available to lower income households.

General Plan 2035 policy H-C-7 would allow low density sites of three acres or less to develop at density up to 15 units per acres, if they met certain conditions, and would encourage the development of townhouses in the range of 8 to 13 units per acre. This density bonus policy would require at least one very low or two low income rental units to be maintained at affordable rate for 10 years for every 10 at market rate rentals.

Comment: Extremely concerned that there are Significant and Unavoidable Impacts in the “GHG Arena.” No one has talked about this. The AG has been coming to cities and pushing very hard on GHGs, and the General Plan needs to be brought into compliance with what the AG has been doing. Policies in the General Plan that are listed as mitigation for GHG are not mandatory or feasible. They need to be mandatory and enforceable (or they don’t count as mitigations). The mitigation measures need to be clear – many of them are vague. Need to include policies saying that you will adopt a Climate Action Plan and put many of the policies from the Community Climate Action Plan and the Green Building Report into the General Plan in order to bring it into compliance. The General Plan must have policies that state the development of a Climate Action Plan and Green Building Program. You must list mitigations that are feasible and enforceable.

Response: As discussed on page 4.D-25 under Impact 4.D-1, of the Draft EIR, the projected General Plan 2035 population and growth rate would exceed the population and growth rate included in the 2003 ABAG Projections, which were extended out to 2035 for the comparison. In addition, although development of residential units near transit
corridors, denser neighborhoods, and other traffic reduction strategies would reduce VMT, the overall City-wide rate of increase in VMT per year would exceed both the population growth rates included in the 2003 ABAG Projections and those proposed in the General Plan 2035.

In addition, see Chapter 2, Staff Initiated Changes to the Draft EIR for additional GHG mitigation measures and General Plan 2035 policy language.

As noted on page 1-10 of the General Plan 2035, the general plan is organized into goals and policies. The policies provide more specific direction on how to achieve the goals outlined in the General Plan. Policies outline actions, procedures, programs, or techniques to attain the General Plan goals. Many of the policies include quantitative statements that can be implemented by city staff, such as requiring corridors to operate at level of service D. As outlined in Table 2-1 of the Draft EIR, by adopting the proposed General Plan 2035, the City would adopt all the goals and policies, as well as the mitigation measures required by this EIR.

As stated on page 6-6 of the Draft EIR, in accordance with CEQA Section 21083, an EIR must also identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures. Impacts related to Air Quality and Transportation, although mitigation measures by have been identified, would have a significant and unavoidable effect because the impact couldn’t be reduced to a less than significant level.

In addition, see Chapter 2, Staff Initiated Changes to the Draft EIR for additional GHG mitigation measures and General Plan 2035 policy language.

Comment: If mitigations are listed as infeasible, the FEIR must list why they are infeasible and the EIR does not do so in its current form. There are many other documents that we submitting as part of our EIR comment letter that should be (responded to).

Response: As noted in Chapter 6 of the Draft EIR, five impacts were found to be significant and unavoidable, two related to transportation (4.C) and three related to air quality (4.D). In accordance with CEQA Section 21083, and with CEQA Guidelines Sections 15064 and 15065, an EIR must also identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the implementation of the proposed project, or by other mitigation measures that could be implemented, as described in Chapter 4 of the Draft EIR. All other impacts listed in Table 2-1, starting on page 2-4 for the Draft EIR, would be reduced to less than significant levels with implementation of the proposed policies outlined in the Santa Rosa General Plan 2035 or the additional mitigation measures identified in the Draft EIR.

Furthermore, as noted on page 4.C-20 and 4.C-28 of the Draft EIR, there are transportation mitigation measures available to reduce impacts to less than significant levels, however, there is no funding identified for facility improvements and therefore the impacts are significant and unavoidable.
Comment: Right now there is funding coming to the City from the Energy Efficiency and Conservation block grant program at the federal level from the Department of Energy which can be used for planning to reduce GHG emissions. We recognize that the previous Council gave us a short General Plan process because of the funding situation with the City, but some of that $1.5 million coming to the City can be used for staff time to improve the General Plan to reduce GHG emissions through many of the policies that we'll be listing and we hope that you will give direction to the City to do so.

Response: This Final EIR presents additional GHG mitigation measures in Chapter 2, under Staff Initiated Changes to the Draft EIR.

Planning Commission Vice Chair Caston

Comment: DEIR woefully lacks analysis and mitigations of GHG in Air Quality section. None of our existing programs are mentioned as mitigations that are currently ongoing, not even our current mandatory Green Building program, which puts us 15 percent above Title 24 has a very clearly calculable reduction in GHG. So that needs to be included in there, as well as all our other efforts. There is no reference of Green Building or other efforts to meet the GHG goals of the city. There was a staff presentation from Community Development to the Council a few months ago that outlined many of those efforts and everything that was identified in that report, where mandatory and appropriate, should be included as a mitigation.

Response: The discussion and analysis of greenhouse gas emissions has been expanded to include programs currently being implemented by the city. In addition, mitigation measures have been added to reflect continued implementation and monitoring of these programs. As indicated on page 2-5, policy H-G-1 has been added to reflect the Build It Green program. Other energy efficiency policies have been added, including the City’s participation in the Climate Protection Campaign and development of a Climate Action Plan (see page 2-6). These additions supplement the discussion outlined in Section 4.D, page 4.D-9 of the Draft EIR under Regulatory Setting for Greenhouse Gases, where State and City regulations relating to meeting greenhouse gas reduction goals are presented. In addition, Santa Rosa City Council Resolution 26573, Built It Green, and Resolution 27001 relating to green building technology are presented in Section 4.O, Energy (see page 4.O-11 of the Draft EIR).

Comment: I’m concerned with the conclusion that because of the fact we have more space/more people than ABAG’s projections for us for 2030 that we have a Significant and Unavoidable impact in GHG emissions. Firstly, I don’t see how we can get that analysis when we have 2035 plan for population projections and we’re using a 2030 date in order to establish a Significant and Unavoidable impact. Saying the reason they are building more units is that they are being built near transit corridors and being built in denser neighborhoods, that is in itself a VMT mitigation –
that the State is recognizing. So I see the analysis that talks about that a bit, but I don’t understand how we get to a Significant and Unavoidable impact when that goes against what the EPA is saying, what CalEPA is saying, what ABAG is saying, what everyone is saying. And I know that ABAG does have some guidelines, but our own analysis can overcome those guidelines, and I want to see discussion of why we can or cannot overcome those guidelines included in the EIR.

Response: The conclusion regarding a significant unavoidable impact with regard to greenhouse gas emissions was not based on the proposed General Plan’s conflict with ABAG’s projections, as suggested by the comment. Conflict with ABAG’s projections was cited under Draft EIR Impacts 4.D-1 and 4.D-6 in order to justify the findings of significant and unavoidable project-specific and cumulative impacts resulting from a conflict with regional air quality planning efforts (i.e., growth in excess of ABAG forecasts necessarily results in such a conflict, and therefore a significant impact, based on BAAQMD’s CEQA Guidelines [BAAQMD, 1999; p. 22]). Rather, the significant unavoidable impact with regard to greenhouse gas emissions (Impact 4.D-5) was based on a calculation of anticipated CO2-equivalent (CO2e) emissions that would result from projected growth increases in vehicle traffic and from stationary source emissions pursuant to growth anticipated under the proposed General Plan 2035. These calculations are discussed on DEIR pp. 4.D-36 through 4.D-39 and are based on standard models including the California Air Resources Board’s EMFAC2007 model and the URBEMIS2007 emissions model, as indicated in Table 4.D-7. These models use current and widely accepted standard emissions rates for both vehicular traffic and stationary source emissions such as combustion of natural gas for heating, etc. and their use is consistent with current CEQA practice, which provides a reasonably conservative estimate of greenhouse gas emissions. Therefore, the finding of a significant and unavoidable impact is based on an actual increase in projected emissions rather than on an inconsistency with ABAG’s population projections or an inconsistency with any regional air quality plans.

As noted by commenter, the city has taken many steps to reduce greenhouse gas emissions through land use planning, including increased residential densities and activity intensities to develop a compact land use pattern. Specifically, residential densities in the vicinity of the downtown SMART station have been increased. The increased population capacity of the draft General Plan 2035 has been accommodated within the existing Urban Growth Boundary. The comment is correct that these steps present a more efficient land use pattern which will reduce greenhouse gas emissions by reducing automobile travel in favor of more public transit use and pedestrian and bicycle mode selection, compared to growth that would occur in the absence of such efforts. However, it would be difficult to accurately quantify the reductions in pollutant emissions, including those of greenhouse gases, which would result from these planning strategies in Santa Rosa, because changes in local growth patterns could both result in and result from future changes in growth and development in the Bay Area and beyond. Regardless, it can be fairly stated that it cannot be quantified at this time. However, it is assumed that without the implementation of the City’s adopted strategies, and those proposed in the General Plan, to increase density, provide opportunities for jobs near residences, and otherwise reduce dependency on automobile
travel, the increases in pollutant emissions, including greenhouse gases, would be greater than what would occur if such strategies are fully pursued.

In presenting a calculation of forecast emissions, whether for an individual project or, as in this case, for a plan, an EIR typically assumes that all the future development attributable to the plan or project would be new, because this assumption ensures that impacts are not understated. The EIR, however, does not attempt to quantify potential outcomes of the proposed General Plan, because to do so would be highly speculative. Thus, by treating growth pursuant to the General Plan as new growth within the region, the EIR presents an appropriately conservative scenario and does not risk understating potential impacts of the Plan on greenhouse gas emissions.

BAAQMD CEQA Guidelines, Revised December 1999.

Comment: Another mitigation that needs to be incorporated if this project goes forward is that we’re discussing how we’re analyzing each project as it comes in. We have existing technology and existing programs on how we analyze – (including) the URBEMIS Program that we can utilize to look at trip generation, to look at walkability to look at how we can reduce the GHGs. We already have it, it’s something we can and do use on many projects so that needs to be included as a mitigation measure, and especially if we’re maintain that SU impact, we need a clear threshold in that mitigation measure for when we’re using URBEMIS, in order to analyze it – I cannot see us sitting up here and making a Statement of Overriding Considerations that a 3-lot subdivision is going to be the cause of the extinction of the polar bear, which is essentially what this EIR would have us saying. So I trust that the AG’s office and Greenbelt Alliance will be providing a more technical explanation of that particular comment but it’s a serious concern and there does need to be a lot of additional focus on it.

Response: The city of Santa Rosa uses the URBEMIS model to analyze air quality impacts of new development relating from motor vehicle emissions. This analysis is performed, and will continue to be performed, on development proposals when specific detail is available to run the model. The Draft EIR was not designed to be a master EIR to cover all subsequent projects, but rather is a program EIR produced to inform decision makers of the broad impacts associated with this planning document. Statements of Overriding Consideration need not be made on subsequent individual projects if the environmental analysis conducted on those projects finds their impacts on air quality and greenhouse gas emissions to be less than significant after mitigation. While the Draft EIR provides comprehensive analysis, the environmental data and conclusions can be supplemented by initial studies and information produced during the review of each development proposal. The result could be identification of mitigation measures leading to findings of less than significant impact from a specific project.

The degree of public involvement in the focused general plan update was directed by the City Council when the update workplan was approved. It considered the relatively recent extensive public involvement in the last general plan update (2002) as well as the
considerable public involvement in the Downtown Station Area Specific Plan. Due to the focused nature of this update and budgetary and state mandated time limitations for adoption of the Housing Element, the City Council concluded that a more limited public involvement program would be sufficient.

**Comment:** On process for the EIR, this has been a woefully inadequate EIR process. It may meet the bare minimums that EIRs require in law but I have serious concerns around the entire process. I am not pleased at the lack of public involvement and I think it is potentially going to be a problem going forward. It is incredibly unfortunate that for the first time in our history, we chose not to hold community meetings for a process like this and I’m going to have a lot of heartache and difficulty in the next few weeks figuring out what my decisions are going to be. I heard the public comment today from literally everyone. I think we have a public united on one point in this General Plan, and that’s that they want to be involved.

**Response:** As outlined under B. Environmental Review, on page 1-3 of the Draft EIR, this review process taken by this EIR, thus far, has been consistent with the California Environmental Quality Act (CEQA). A Notice of Preparation was sent on September 22, 2008 with the mandatory 30-day public comment period. A public scoping meeting was held on during this period, which was noticed in the local newspaper and on the City’s website, pursuant to Public Resource Code Section 21080.4 and CEQA Guidelines Section 15082.

Pursuant to Public Resource Code Section 21092 and CEQA Guidelines Section 15087, a Notice of Availability was posted in public places, including City Hall, the County Clerk’s Office, and in the local newspaper noting the 45-day public review period on the Draft EIR.

**Planning Commission Chair Duggan**

**Comment:** Echoes comments made by fellow commissioners (comments about GHGs, etc).

**Response:** The comment is noted. The responses to comments made by the other commissioners are addressed in this section of the Final EIR.

**Comment:** On page 3-15, at the top of the page, it references a GHG Emission Reduction Action Plan, and then it doesn’t describe what the plan is. On the following page, it goes through and lists all the plans that are referenced and describes a little bit about them, and it’s not listed on page 3-16, where it would come after Economic Sustainability Strategy and Recreation and Parks General Plan Amendment. I’d like to see that added to find out what that actually is and where it comes from.

**Response:** As described on page 4.D-17 of the Draft EIR, the *City of Santa Rosa Greenhouse Gas Emissions Reduction Action Plan Analysis* (Climate Protection Campaign, 2008), the
City of Santa Rosa is implementing the Local Governments for Sustainability (ICLEI) program to reduce GHG emissions from City controlled sources. The five-milestones of this program include (1) creating the GHG inventory; (2) setting a GHG reduction target; (3) creation of a GHG reduction plan to meet this target; (4) implementation steps; and (5) monitoring and adjustment. Milestones 1 and 2 have been completed, which includes a reduction target of 20 percent below 2000 levels by 2010 for internal operations. The City of Santa Rosa Greenhouse Gas Emissions Reduction Action Plan Analysis discusses five GHG emissions reduction plans (and the financial impact of each) to meet this reduction target.

Comment: On page 4.B-8 there’s another non sequitur, in the final paragraph it says “the total of 128,400 new jobs, I believe that’s total jobs not new, so the word “new” should be deleted.

Response: The text has been updated to reflect the deletion of the word “new”. The revised text is presented in Chapter 2, Changes to the Draft EIR in Response to Comments.

Comment: On 4.C-7, Existing Traffic LOS and Deficiencies, it doesn’t specify that it’s autos only, and it should make that very clear. It talks about LOS and delay at individual intersections and it doesn’t have any similar discussion of delays for bikes and pedestrians and impacts on them. Just all modes getting around town.

Response: As stated on page 4.C-7 of the Draft EIR, it’s the City’s policy to calculate level of service (LOS) based on the average arterial travel speed for motor vehicles for corridor analysis and based on delay for individual intersections. The LOS analysis, per General Plan Policy T-D-1, applies specifically to vehicles. The City has not adopted methodology or thresholds for monitoring LOS for bicycles or pedestrians.

Comment: On 4.C-17, the Table 4.C-5, under LOS some of the LOS will have two letters (D/F, C/D), and I couldn’t find any footnote explaining the meaning of those combined ratings were for those designations. What would D level of service versus F mean?

Response: The reason more than one letter level of service (e.g., D/F) is shown because some of the routes are fairly long and the level of service varies depending on which segment of the highway is being analyzed. For example, D/F indicates that some sections are D, E, or F level of service (LOS). This was done to compress many miles of highways into a single, comprehensible table. For the LOS on a specific segment of each route, the reader can refer to the technical appendix of the Draft EIR, which shows the calculated LOS for each modeled segment within the City for both the a.m. and p.m. peak hour.

Comment: On 4.C-28, under Cumulative Traffic Impacts on Freeway Operations, it talks about implementation of measures shown below, this is the third paragraph, would mitigate impacts and then it lists several different measures and at the very end where it says mitigations, it says none are available and that there’s a SU impact, so I don’t understand – I think that section should be
rewritten if it’s the case that no mitigations are available because it presents it as if they are available and then says they are not available.

**Response:** As described on page 4.C-28 of the Draft EIR, mitigations measures are infeasible related to transportation facility improvements because there are no funding sources identified to implement improvement projects, thus the impact can not be mitigated. An unfunded mitigation measure leaves the impact as significant and unavoidable.

**Comment:** On 4.D-34, last paragraph, it talks about implementation of Policy OSC-J-4 and I couldn’t find that policy anywhere. I think it might be OSC-J-2 or another one, but I think that is incorrect, that reference.

**Response:** OSC-J-4 should be referenced as Mitigation Measure 4.D-4 (page 4.D-36 of the Draft EIR). The Draft EIR has been amended to reflect this change (see Chapter 2, Changes to the Draft EIR in Response to Comments).

**Comment:** Page 4.O-9 & 4.O-10, on the second bullet point at the top of 4.O-9, it says attainment of AM-32, I don’t know if that’s AB-32 which is referenced on page 4.O-10, or if that’s something different –if it’s something different it doesn’t describe what it is.

**Response:** The text of the Draft EIR has been revised to correct the typo to AB-32 (see Chapter 2, Changes to the Draft EIR in Response to Comments).

**Comment:** Page 4.O-15, Impact 4.O-3, makes an inconsistent statement. In the first paragraph, it says “the land use patterns proposed in the GP2035 would not be substantially different,” and then in the last sentence it says “the Proposed GP 2035 reinforces the urban growth boundary and encourages higher intensity land uses”. The next paragraph gives a bunch of numbers of trips I assume to be auto trips, but it doesn’t designate whether they are trips per day, trips per year, or trips per whatever measure.

**Response:** Impact 4.O-3, on page 4.O-15 of the Draft EIR describes the impacts of the proposed General Plan 2035’s impact on energy use for transportation. The land use pattern under the proposed General Plan 2035 would not be substantially different than the existing General Plan (see in Chapter 3 of the Draft EIR), in that few parcels are proposed for redesignation; however, the proposed General Plan 2035 would encourage increased density of land uses.

The vehicle trips referenced in Impact 4.O-3 refer to vehicle trips per year. The text of the Draft EIR has been updated to reflect this clarification (see Chapter 2, Changes to the Draft EIR in Response to Comments).

**Comment:** On 4.O-18 I think there is a word that is extra in the last paragraph at the top of the page: the paragraph that summarizes not the cumulative impact but the impact above that,
“GP2035 would reduce transportation energy consumption be the per capita energy use” Maybe the “the” should be removed and the sentence should be rewritten to clarify what that means.

**Response:** The word “the” has been deleted from this sentence. The text of the Draft EIR has been updated to reflect this clarification (see Chapter 2, Changes to the Draft EIR in Response to Comments).

**Comment:** On 6-6, under D, Significant and Unavoidable impacts, it lists a bunch of impacts, and then the previous page 6-5 kind of indicates that there are some things that could be mitigated so this didn’t make total sense to me. It says the environmental topics are not easily quantifiable into the future but then we know that they’re unmitigatable, which seems inconsistent.

**Response:** As stated on page 6-5 of the Draft EIR, the City of Santa Rosa through the proposed General Plan 2035, would continue to develop policy framework to lessen cumulative impacts. Impacts listed on page 6-6 of the Draft EIR are significant and unavoidable because General Plan 2035 policies and other mitigation measures outlined in the Draft EIR would not reduce the Plan’s impact to a less than significant level as required by CEQA.

**Commissioner Allen**

**Comment:** With this EIR, it’s as if we’re not paying attention to where the State of California is going and where federal policy is going to be taking us within the next couple of years if not the next decade. We’re a post-industrial society; we’re going toward renewable energy. We essentially have an EIR that ends up as an impediment to sustainable development long-term, we’re not doing favors to the community, the business community, the developers. I certainly have a lot of concerns about certifying this EIR. There’s been a lot of discussion of unintended consequences. I find it a supreme irony that we may end up certifying an EIR that may well end up embroiling us in a lot of litigation because it’s really not incorporating where we’re going as a society within California and the nation.

**Response:** The Draft EIR addresses issues of sustainability and renewable energy within Sections 4.D, Air Quality and Climate Change and 4.O Energy. In addition to the numerous policies that have been incorporated into the General Plan 2035 with the specific purpose of mitigating climate change and promoting sustainability in the long-term, Chapter 2, Revisions to the Draft EIR, of this Final EIR adds Mitigation Measure 4.D-5 to further respond to this issue. Mitigation Measure 4.D-5 requires the City to develop a Climate Action Plan that identifies greenhouse gas emissions within the City as well as ways to reduce those emissions. The Climate Action Plan would contain provisions to address components such as funding, accountability, public education, quantification of greenhouse gas inventories, incentivizing the process for constructing energy-efficient buildings, building orientation, energy efficiency audits, water conservation strategy, and many
others, which, in combination, would ensure that substantial measures are taken well into the future to lower greenhouse gas emissions and encourage sustainable development.

Commissioner Bartley

Comment: GHG issue – Not comfortable certifying an EIR where we’re going to have to issue a Statement of Overriding Considerations for every entitlement, potentially. That’s got to be squared out before we go anywhere.

Response: As noted on page 1-2, the Draft EIR is a “Program EIR” as defined by CEQA Guidelines Section 15168. The Draft EIR is a program-level analysis that considers the broad environmental effects of the overall proposed General Plan. This EIR will be used to evaluate subsequent projects (public and private) under the proposed General Plan 2035 consistent with CEQA and the state CEQA Guidelines. When individual projects or activities under the General Plan 2035 are proposed, the city would be required to examine the projects or activities to determine whether their effects were adequately analyzed in this EIR. If the projects or activities would have no effects beyond those analyzed in this EIR, no further CEQA compliance would be required. Thus, environmental issues related to air quality and traffic that require Statements of Overriding Consideration for the proposed General Plan 2035 would be evaluated on a project-by-project basis to determine feasible mitigation measures. Moreover, it is likely that for many, if not most, subsequent entitlements—other than for very large projects—a subsequently proposed project would not make a considerable contribution to any cumulative impacts related to transportation and air quality. (In the context of those subsequent projects, cumulative impacts would be those identified in the General Plan EIR or comparable set of forecasts.) Thus, the individual project, were it to result in no project-specific significant impacts, would not necessitate a Statement of Overriding Considerations as part of its entitlement action(s).


Response: The word “the” has been deleted from this sentence. The text of the Draft EIR has been updated to reflect this clarification (see Chapter 2, Changes to the Draft EIR in Response to Comments).

Comment: I read that this EIR is also covering the update of the Bike and Pedestrian Master Plan – it’s not, I hope. I can’t figure out how we can do the environmental analysis when we don’t have the plan yet.

Response: As stated in Chapter 2 under Staff Initiated Changes to the Draft EIR, the Bicycle and Pedestrian Master Plan has been removed from inclusion in this EIR due to scheduling changes.
Commissioner Cisco

Comment: Concern with GHGs and need for Statement(s) of Overriding Considerations.

Response: Please see response to comments for Commissioner Caston regarding Significant and Unavoidable impacts and response to comments for Commissioner Bartley regarding the issuance of Statement of Overriding Considerations.

Commissioner Banuelos

Comment: Echoes what other Commissioners have said. Agrees with Commissioner Caston about Significant and Unavoidable impacts.

Response: Comment noted. Please see response to comments for Commissioner Caston regarding Significant and Unavoidable impacts.

Commissioner Poulsen

Comment: Big issue with EIR is how are jobs being reduced over the long term through the land use? With present economy would rather see more jobs than housing, or at least a balance (between jobs and housing). We should be trying to create jobs. In EIR population goes up, but jobs go down. How is that occurring in the land use in the present time?

Response: The Draft EIR analyzes Population, Housing, and Employment in Section 4.B. The draft general plan does not reduce the acreage designated for non-residential uses from the current general plan other than land held by government agencies. The reason for the different jobs projections is due to a change in the methodology used to calculate job capacity within the Urban Growth Boundary. The job capacity of the draft General Plan 2035 is the same as the current General Plan (2020). Therefore, if the higher number of jobs projected under the former methodology (current plan) is more accurate, that job development can still occur under the proposed plan.

State law requires that housing elements include an analysis of employment trends. This requirement led to the revision of the General Plan’s jobs projections. The Draft General Plan assumes buildout of all vacant land within the Urban Growth Boundary by 2035. The forecast of the number of jobs is based on development of that land and can be also viewed as a capacity analysis. The projection is a forecast of the future based on anticipated development and does not limit job creation in any way.
Specifically, the city’s vacant land inventory was utilized to determine the number of vacant acres in each non-residential land use category. Acres were converted to square footage, and then divided by the number of employees per square foot (as assumed in the current General Plan) to determine the number of total employees.

When the current General Plan was being revised, an analysis was conducted of built land likely to revitalize over the planning period. New jobs were forecast based on these revitalization assumptions. Given the focused scope of this general plan update, such an analysis was not possible. This difference in methodology contributes to fewer jobs projected in the Draft General Plan because it does not rely on redevelopment of parcels.

The Downtown Station Area Specific Plan reduced non-residential square footage by about 600,000 square feet, mostly industrial square footage. One of the major goals of the Station Area Plan, adopted in 2007, was to increase densities around the downtown station to enhance ridership and provide a transit supportive environment. This resulted in some changes from non-residential to higher density residential in this area.

In conclusion, the methodology used to generate job estimates resulted in a diminished number of jobs projected into the future, although the Draft EIR does not limit actual job creation in any way.
CHAPTER 6
Mitigation Monitoring and Reporting Program
<table>
<thead>
<tr>
<th>Mitigation Measures Adopted As Conditions of Approval</th>
<th>Responsibility for Implementation</th>
<th>Mitigation Schedule</th>
<th>Monitoring/Report Responsibility</th>
<th>Status/Date Completed</th>
<th>Monitoring Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Mitigation Measures - Air Quality and Climate Change</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The City of Santa Rosa shall require new sensitive uses proposed to be located within 500 feet of high volume traffic routes where daily vehicle counts exceed 100,000, require the use of an HVAC system with filtration to reduce/mitigate infiltration of vehicle emissions as warranted by exposure analysis.</td>
<td>Community Development</td>
<td>During permit processing</td>
<td>Planner assigned to project</td>
<td>Ongoing</td>
<td>Condition at Project Review Monitor During Construction</td>
</tr>
<tr>
<td>The City of Santa Rosa has developed a Greenhouse Gas Emission Reduction Action Plan that identifies greenhouse gas emissions within the City as well as ways to reduce those emissions. The City should continue to implement this plan for city operations as well as implement some of the Community Climate Action Plan 2008 that was developed by the Climate Protection Campaign. Many of the suggestions, mechanisms and policies contained in both of these documents, as well as the General Plan, are either ongoing or if implemented, can have a positive impact on reducing GHG emissions community-wide. Implementation shall parallel the requirements adopted by the Air Resource Board specific to this issue and will incorporate analyses, goals, and strategies included in the General Plan, City Council Resolution #26341 (GHG reduction targets) and the City of Santa Rosa Greenhouse Gas Emissions Reduction Action Plan Analysis. Specifically, the City shall ensure that the following key items are done:</td>
<td>Community Development</td>
<td>Pending approval from City Council</td>
<td>Community Development</td>
<td>Ongoing</td>
<td>Annual Evaluation</td>
</tr>
<tr>
<td>• Update and maintain the inventory of all known, or reasonably discoverable, sources of greenhouse gases in the City via the GHG Emission Reduction Action Plan,</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Compare the inventory of the greenhouse gas emissions level in 1990, the current level, and revise as necessary the level projected for the year 2035 based upon ongoing progress, and</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Incorporate new city and community activities/goals/policies which move toward achievement of the targets to reduce municipal greenhouse gas emission by 20 percent from 2000 levels by 2010 and help facilitate the community-wide greenhouse gas emission reduction target of 25 percent from 1990 levels by 2015.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Mitigation Measures Adopted As Conditions of Approval

<table>
<thead>
<tr>
<th>Mitigation Measure – Biological Resources</th>
<th>Responsibility for Implementation</th>
<th>Mitigation Schedule</th>
<th>Monitoring/Report Responsibility</th>
<th>Status/Date Completed</th>
<th>Monitoring Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>The City of Santa Rosa shall incorporate the avoidance and mitigation measures described in the Santa Rosa Plain Conservation Strategy and the USFWS Programmatic Biological Opinion, as conditions of approval for development in or near areas with suitable habitat for California tiger salamander, Burke’s goldfields, Sonoma sunshine, Sebastopol meadowfoam, and many-flowered navarretia. However, in accordance with the USFWS Programmatic Biological Opinion, projects within the Southwest Santa Rosa Preserve System will be evaluated individually and mitigation may not necessarily adhere to the ratios described in the Conservation Strategy.</td>
<td>Community Development</td>
<td>During permit processing</td>
<td>Planner assigned to project</td>
<td>Ongoing</td>
<td>Annual Evaluation</td>
</tr>
</tbody>
</table>