Environmental Assessment
Determinations and Compliance Findings for HUD-assisted Projects
24 CFR Part 58

Project Information

Project Name: Mahonia Glen

Responsible Entity: City of Santa Rosa
   Housing and Community Services
   90 Santa Rosa Avenue
   Santa Rosa, CA 95404

Grant Recipient (if different than Responsible Entity):

State/Local Identifier:

Preparer: Roy Hastings, MPPA

Certifying Officer Name and Title: Clare Hartman, Deputy Director
   Planning and Economic Development
   (707) 543-3185
   chartman@srcity.org

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): R.L. Hastings & Associates, LLC
   P.O. Box 552
   Placerville, CA 95667

Direct Comments to: Julie Garen
   Program Specialist I
   (707) 543-4339
   jgaren@srcity.org
Project Location:
5173 Highway 12, Santa Rosa, CA 95409
APN: 183-410-060

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

Mahonia Glen, formerly known as One Calistoga, is a proposed 99-unit affordable housing development to be located at 5173 Highway 12, at the corner of Highway 12 and Calistoga Road in northeastern Santa Rosa. The site had once been a garden nursery owned by the Prickett family and is considered an infill site as it is developed with urbanized uses on all borders. Currently the site is vacant.

Ninety-eight of the planned units will be designated affordable, with one non-restricted manager’s unit. Fifty-five of the units will target low-income general population families and individuals with incomes ranging from 30% to 60% AMI. Forty-three of the units will be set aside for farmworker households with incomes ranging from 30% to 60% AMI levels.

The project is situated on the north side of Highway 12, west of Calistoga Road. Upon completion, the entrance to the site will be via a new driveway at Highway 12 on the south side of the property. The second entrance to the site will provide access via a new driveway and turning lane along Calistoga Road on the eastern side of the property. The driveway along Calistoga Road will align with the existing driveway at the shopping center located directly across from the site. The property is located in an existing urban boundary of the city of Santa Rosa, with a grocery anchored retail center to the east, predominantly mature single and multifamily residential to the west, and Austin Creek to the north. The Project is abutting Highway 12, a major east/west connector through the city of Santa Rosa and Sonoma County.

The site is 5.03 acres (gross acreage) with 4.75 acres to be developed. The property is currently vacant and is predominantly covered by grass and shrubs with a few trees along the southern boundary. A 15-foot landscape buffer zone will be maintained between the southern parking lot and property line. A 30-foot setback will be maintained between the property line and the top bank of Austin Creek, with a path to allow access for maintenance.

Description of the Area

Santa Rosa is the largest city and the county seat of Sonoma County. The County is situated north of Marin County spanning from just above Cloverdale in the north of the County to San Pablo Bay on the south and the coastline of the Pacific Ocean on the west to Napa County on the east. The city is located approximately 55 miles north of San Francisco and approximately 95 miles west of Sacramento.

With a 2020 population of 178,127, Santa Rosa’s population growth has slowed somewhat, its population has increased by only 6.14% since the 2010 census, which recorded a population of 167,815 in 2010. Spanning 42.7 miles, Santa Rosa has a population density of 4,172 people per square mile.
Based on data from 2015-19, the most current available, the average household income in Santa Rosa is $75,630 with a poverty rate of 10.30%. The median rental costs in recent years comes to $1,609 per month, and the median house value is $540,600. The median age in Santa Rosa is 38.8 years, 37.4 years for males, and 40.5 years for females.

The city’s top employers include the County of Sonoma, Kaiser Permanente, Sutter Medical Center of Santa Rosa, St. Joseph Health System and Santa Rosa Junior College, each of which employs thousands of people.

Sonoma County is a scenic area known for the Sonoma Valley wine region, as well as other notable winemaking areas such as the Dry Creek and Alexander valleys, and a beautiful coastline, hills and valleys along with fine dining, boutique hotels and bed and breakfast establishments. Sonoma County and the City of Santa Rosa are tourist destinations due to the scenery and an abundance of activities for both tourists and residents.

Description of the Surrounding Neighborhood

The project site is located in northeast Santa Rosa on Highway 12 directly across from the St. Francis Shopping Center, which features a Safeway and Safeway Pharmacy, Exchange Bank, an auto repair shop, and several restaurants, making this an ideal location for multifamily housing. Other adjacent land uses include single family residential. The site is located within the desirable Rincon Valley school district. The site is located on the Santa Rosa CityBus Route 4/4B bus route, which connects to downtown Santa Rosa, Rincon Valley Community Park, Maria Carrillo High School, and Rincon Valley Library, among other destinations. The site is also located on Sonoma County Transit Routes 30 and 34, which connect to downtown Santa Rosa and the City of Sonoma. Additionally, the site is bordered by Austin Creek to the north.

Construction and Design Description

The development consists of eight, three-story residential type V buildings and one, one-story community building, with surface parking spread throughout the site. On-site management offices and resident community space will be in the community building at the center of the site. A grass lawn adjacent to the community building will provide outdoor amenity space for residents, and a children’s play area will be located next to the community room and grass lawn. Mid-Peninsula the Farm, a nonprofit, will be the developer and owner of the project. Mid-Peninsula the Farm’s commitment to environmental sustainability will be evident using photovoltaic electricity generation, use of all-electric appliances, and certification as a GreenPoint Rated property.

The development will consist of 98 units of affordable housing and one non-restricted manager’s unit for a total of 99 units on a 4.75-acre parcel. The housing program consists of 42 one-bedroom units, 30 two-bedroom units, and 27 three-bedroom units, with one two-bedroom unit reserved for the onsite manager. Proposed unit sizes are: 3-bedroom townhomes – 1,216 SF; 3-bedroom flats – 1,181 SF; 2-bedroom townhomes – 932 SF; 2-bedroom flats – 934 SF; 1-bedroom flats – 570 SF.

Affordability ranges from 30% to 60% of Area Median Income (AMI), with the average affordability of the project being 49.80% AMI. Common areas will include a 748 square foot
community room, 290 square foot laundry room, 215 square foot bike storage, and outdoor space. The project will provide on-site services for residents.

As part of the project, Mid-Peninsula the Farm will restore site features such as Austin Creek to the north and a drainage ditch that bisects the site. The riparian area around the creek will be cleared of invasive plants, and the ditch will be enhanced to improve stormwater drainage and visual appeal.

The development of the property will also provide street enhancements along the Calistoga Road and Hwy. 12 frontages, including locating a new bus shelter on the highway, and closing existing bike and pedestrian gaps. The installation of sidewalk and bike lanes will provide the future residents of Mahonia Glen and the surrounding neighborhood safe access routes to schools and other amenities via walking and biking.

Units will have ENERGY STAR appliances including refrigerators, oven and ranges and dishwashers.

The exterior design includes a combination of projecting porches, bay windows, and material variations to create a comfortable residential scale and to ensure the design meets Santa Rosa’s Objective Standards. The asymmetrical sloped roof is designed to maximize the potential for rooftop solar panels.

**Permanent Sources of Project Funding:**

1) Union Bank – Permanent Loan
   $  4,518,519.00

2) California Department of Housing and Community Development (HCD) California Housing Accelerator Funds
   $52,931,727.00

3) California Department of Housing and Community Development (HCD) Joe Serna Jr. Farmworker Housing Program
   $  9,889,372.00

4) City of Santa Rosa Community Development Block Grant
   $  2,900,000.00
   Total Estimated Costs -
   $70,239,619.00

**Development Partners:** None

**Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:**

The primary purpose of the proposed project, is to develop 99 units of affordable housing, including one manager’s unit, in an area with high housing costs and limited affordable housing.

The Concord Group (TCG) prepared a market study for the project dated April 8, 2021. TCG concluded that “[T]he rents planned for the Project are very affordable relative to the market rate competitive set, targeting individuals, family, and farmworker households with incomes ranging from 30% to 60% of AMI. All four affordable apartment projects surveyed in the PMA [Primary Market Area] are effectively 100% occupied and maintain waiting lists. All leasing managers noted that...
turnover is very low. Any vacancies are in the process of actively being filled off of existing waiting lists. Based on the strong performance of existing affordable stock, combined with depth of demographic demand from income-targeted households, the majority of units in the Project will lease-up in an expedited timeframe – approximately two-to-three months (20-25 leases per month). Due to a smaller but still strong demand pool, units targeted to farmworkers are expected to lease-up at a lower rate of 7-10 units a month, fully absorbing in five to six months. The five units targeted towards homeless individuals are expected to lease-up as soon as they become available for occupancy, due to the high demand and referrals from Sonoma County’s coordinated entry program. TCG quantified demand for affordable units targeted to low-income individuals and families, analyzing Market Area households qualified by age, tenure, income and household size. The analysis indicates there is a shortage of rental supply to serve the targeted low-income population. The required Project capture rate of demand is small and emphasizes the need for additional low-income housing within the community.” (Emphasis added)

Existing Conditions and Trends [24 CFR 58.40(a)]:

The project site is zoned CG - General Commercial which allows residential development as part of mixed-use developments and independent residential developments. The CG zoning district is consistent with the Retail and Business Services land use classification of the City of Santa Rosa’s (City) General Plan.

The City’s goal is to continue developing this and other infill areas of the city to further its goals of placing housing near services and transit and reduce car usage and limit further urban sprawl and the need for additional infrastructure investments. It is possible that in the absence of this project, an alternative project may be proposed for the site at some time in the future, but this may be difficult to achieve without some form of city assistance and may not include the much-needed affordable housing that this project proposes to develop.

Funding Information

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<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Funding Amount</th>
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<tr>
<td></td>
<td>Community Development Block Grant (CDBG)</td>
<td>$2,900,000</td>
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Estimated Total HUD Funded Amount: $2,900,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: $70,239,619
Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

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

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determinations</th>
</tr>
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<tbody>
<tr>
<td>STATURES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</td>
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<tr>
<td><strong>Airport Hazards</strong></td>
<td>Yes     No</td>
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</table>
| 24 CFR Part 51 Subpart D                                                                        | ☐       ☒                                      | The project site is not within an FAA-designated civilian airport Runway Clear Zone (RCZ), or within a military airfield Clear Zone (CZ) or Accident Potential Zone (APZ).
|                                                                                                 |                                                 | - The nearest civilian airport to the project site is the Charles M. Schulz Sonoma County Airport, located over 8.5 miles northwest of the site, outside of all airport zones.
|                                                                                                 |                                                 | - There are no military airfields in the vicinity of the project site.
|                                                                                                 |                                                 | - See Attachment A: Airport Hazards |
| **Coastal Barrier Resources**                                                                     | Yes     No                                     |                           |
| Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501] | ☐       ☒                                      | There are no Coastal Barrier Resources in California – Not applicable. |
| **Flood Insurance**                                                                               | Yes     No                                     |                           |
| Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a] | ☐       ☒                                      | The project does not involve property acquisition, land management, construction or improvement within a 100-year floodplain (Zones A or V) identified by FEMA maps.
|                                                                                                 |                                                 | - According to FIRM map 06097C0734E dated 12.2.08, the project site is located in Zone X, “Area of Minimal Flood Hazard.”
<p>|                                                                                                 |                                                 | - See Attachment B: Floodplain Management |</p>
<table>
<thead>
<tr>
<th>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</th>
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<tbody>
<tr>
<td><strong>Clean Air</strong></td>
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<tr>
<td>Clean Air Act, as amended, particularly section 176(c) &amp; (d);</td>
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<tr>
<td>40 CFR Parts 6, 51, 93</td>
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<tr>
<td>Yes               No</td>
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| *The project site is located in an area which has two Federal criteria pollutants classified as Nonattainment, PM-2.5 (2006) and 8-Hour Ozone (2008 & 2015)* per the EPA Greenbook downloaded 7.11.21 from [https://www3.epa.gov/airquality/greenbook/ancl.html#C ALIFORNIA.](https://www3.epa.gov/airquality/greenbook/ancl.html#CALIFORNIA)

- A NEPA Conformity Analysis prepared by Giroux & Associates, dated October 11, 2021 calculated both construction emissions and operational emissions and compared it to EPA *de minimis* levels and determined: “Maximum annual emissions are much less than their associated *de minimis* thresholds. A formal SIP consistency analysis is not required.”

- Based on these results, neither formal compliance nor mitigations are required.

- See Attachment C: Clean Air

<table>
<thead>
<tr>
<th><strong>Coastal Zone Management</strong></th>
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<tr>
<td>Coastal Zone Management Act, sections 117(c) &amp; (d)</td>
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<tr>
<td>Yes               No</td>
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| *This project is not located in the coastal zone and therefore does not involve the placement, erection or removal of materials, nor increase the intensity of use in the coastal zone.*

- The project site is located approximately 21 miles east of the Coastal Zone per attached California Coastal Commission maps.

- See Attachment D: Coastal Zone Management

<table>
<thead>
<tr>
<th><strong>Contamination and Toxic Substances</strong></th>
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<tr>
<td>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</td>
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<td>Yes               No</td>
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| *The project involves new development for habitation; but is not located within one mile of an NPL (“Superfund”) site, within 2,000 feet of a CERCLIS site, nor adjacent to any other known or suspected sites contaminated with toxic chemicals or radioactive materials that are likely to affect the site with the exception of the REC and de minimis conditions discussed below.*

- Partner Engineering and Science, Inc., (Partner) prepared a Phase I ESA on the project site dated 5.6.19. Partner “identified a recognized environmental condition (REC) on the Site related to potential use of pesticides and herbicides during nursery operations. In addition, Partner identified a former off-Site gasoline service station that was a leaking underground storage tank case where petroleum releases at the gas station had minimally impacted the groundwater underlying the northeastern corner of the Site. No information is available with regard to potential releases at the dry-cleaning facility; however, the long history of operations (1969 to present) suggests releases of the volatile dry-cleaning solvents tetrachloroethene (PCE) and trichloroethene (TCE) are likely to have taken place. Based on the data reviewed for the off-Site properties,
Partner could not rule out that a vapor encroachment condition was present at the Site. Partner recommended that a limited subsurface investigation be performed to assess soil impact from previous nursery operations.

- “In July 2019, following the findings, conclusions, and recommendation developed in the Phase I ESA report, Essel [Essel Environmental Engineering and Consulting] conducted a Phase II Soil and Soil Vapor investigation to sample and analyze shallow soil for pesticides and herbicides and to sample and analyze soil vapor for volatile organic contaminants. The scope of work included sampling shallow soil at nine locations across the Site, sampling surface soil at four locations within an on-Site drainage channel and along the bank of north-adjacent Austin Creek, and installing and sampling three soil-vapor probes along the eastern side of the Site. The purpose of the investigation was to 1) assess the presence of pesticides and herbicides in shallow soil, 2) evaluate the potential for impact to Austin Creek from pesticides, herbicides, and associated metals on the Site, 3) assess the migration of volatile contaminants in soil vapor from nearby properties to the Site, and 4) preliminarily assess the shallow soil for a range of contaminants to evaluate off-Site disposal options. Essel had proposed to investigate the presence and source of contaminants in groundwater underlying the Site; however, groundwater was not encountered in the five borings advanced to depths of 15 to 24 feet below the ground surface.”

Based on the findings of their investigation, Essel concluded the following:

- Essel prepared a Phase I ESA on the project site dated 4.1.21 found one Recognized Environmental Condition (REC), no CRECs or HRECs and one de minimis environmental condition in respect to the site – the same issues identified previously by Partner.

- Due to the property being occupied by a nursery and garden center from sometime around 1950 until 2015, Essel determined that here is a potential that agricultural related chemicals such as pesticides, herbicides, and fertilizers, may have been used and stored onsite. Essel concluded that “the potential for residual pesticides in soil at the subject property represents a recognized environmental condition.”

- Essel assessed the potential for vapor migration and vapor encroachment at the site and determined this to be a de minimis environmental condition: “low concentrations of chlorinated solvents were … detected in groundwater beneath the northeastern corner of the Site. The presence of the petroleum- and solvent-related contaminants in groundwater suggested a potential for a vapor encroachment condition at the Site.” Essel performed a subsurface investigation in 2019 which
detected solvent compounds in the northeast corner of the site and recommended further investigation.

- Essel concluded that “[B]ased on the results of this further assessment, design and installation of a vapor barrier and passive venting system beneath future buildings in this area of the Site may be appropriate.”

- See Attachment E: Contamination & Toxics Substances

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<tr>
<th>Endangered Species</th>
<th>Yes</th>
<th>No</th>
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<td>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</td>
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- The project will not affect Federally listed or proposed threatened and endangered species, nor designated or proposed critical habitat.

- A Biological Assessment (BA) was prepared by LSA, dated December 2021 for consultation with the USFWS. LSA issued an initial report and an update report in 2014 and 2019 (discussed below), respectively, prior to the preparation of this BA. LSA reached the following conclusion stated at the bottom of page 13 of the BA: “No federally listed plant species and two federally listed animal species, California red-legged frog and steelhead, have the potential to occur within the project area. The project will have no effect on listed plant species. The Proposed Action may affect, not likely to adversely affect California red-legged frog and steelhead. Although the jurisdictional ditch does not provide suitable habitat for these species, the ditch is tributary to Austin Creek where suitable habitat may be present.” See the attached report for individual species determinations and planned mitigations/enhancements to existing ACOE jurisdictional features on the site.

- An Updated Biological Resources Report, dated 8.7.19, was prepared by LSA, updating a report prepared by LSA, dated 1.5.14. LSA evaluated site soils, vegetation including special-status plant species, wildlife including special-status wildlife species and jurisdictional features on the site, including Austin Creek and a ditch.

- LSA found no special-status plants or wildlife on the site or likely to be on the site other than the potential for nesting birds protected by the Migratory Bird Treaty Act and/or California Department of Fish and Game code. LSA made recommendations for pre-construction nesting bird and roosting bad surveys and noted the requirement for obtaining permits from ACOE, CDFW and the RWQCB prior to any impacts on the jurisdictional features – Austin Creek and the ditch.

- The USFW Critical Habitat Mapper identified no critical habitat on or near the site.

- See Attachment F: Endangered Species
<table>
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<tr>
<th><strong>Explosive and Flammable Hazards</strong></th>
<th>Yes</th>
<th>No</th>
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<td>24 CFR Part 51 Subpart C</td>
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- The project will expose neither people nor buildings to above-ground explosive or flammable fuels or chemicals containers hazards.

- There are several locations with AST’s within 1 mile of the project site, all of which are outside of the Acceptable Separation Distance per the HUD ASD calculator (ASD Tool) at [https://www.hudexchange.info/environmental-review/asd-calculator/](https://www.hudexchange.info/environmental-review/asd-calculator/) and, therefore, do not present explosive hazards for the project site. The closest site is BNC Auto Care located approximately 319’ from the project site, with a tank of up to 599 gallons containing motor oil, with an ASD of 223.4.’

- See Attachment E for aerials showing the distance to each site and ASD calculations for container sizes.

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<tr>
<th><strong>Farmlands Protection</strong></th>
<th>Yes</th>
<th>No</th>
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<tbody>
<tr>
<td>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</td>
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- The project site contains 3 soil classifications: “Not Prime Farmland,” “Prime Farmland if Irrigated” and “Farmland of Statewide Importance” as identified by the USDA, NRCS. The CA Important Farmland Finder classifies it as “Rural.” The project is an infill project on a previously developed site in a developed area of the City and is, therefore, exempt.

- The project is an urban infill project on a site that previously contained a house and a nursery in a developed area of the City.


- The California Department of Conservation “California Important Farmland Finder” designates the project site as “Urban and Built-up Land.”

- See Attachment H: Farmlands Protection

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<tr>
<th><strong>Floodplain Management</strong></th>
<th>Yes</th>
<th>No</th>
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<tr>
<td>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</td>
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- The project does not involve property acquisition, land management, construction, or improvement within a 100-year floodplain (Zones A or V) identified by FEMA maps.

- According to FIRM map 06097C0734E dated 12.2.08, the project site is located in Zone X, “Area of Minimal Flood Hazard.”

- See Attachment B: Floodplain Management
### Historic Preservation

National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800

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**The City of Santa Rosa has determined, and SHPO has not objected, that no historic properties will be affected by the project.**

Attachment I contains the following supporting documentation:

- City SHPO consultation letter dated 11.15.21 wherein the City stated its finding of “No Historic Properties Affected” per 36 CFR Part 800.4(d)(1); Cultural Resources Study prepared by the Anthropological Studies Center of Sonoma State University dated December 2004; CHRIS report dated 7.15.21; “Cultural resources review of previous work completed” dated 10.29.14; Native American Heritage Commission (NAHC) response letter dated 7.25.21; Tribal Directory Assessment Information (TDAT) listing; consultation letters sent to tribal list contacts dated 8.9.21 with one response received on 8.24.21 by email from Brenda L. Tomaras stating that the Lytton Rancheria was interested in consulting on the project and requesting a copy of a cultural resources report once completed and a follow-up email on 11.8.21 to Julie Garen of the City stating that “Lytton is not seeking any further consultation,” and; National Register of Historic Places (NRHP) internet search results for the County of Sonoma and the City of Santa Rosa. There are 67 registered properties in Sonoma County with 16 in the City of Santa Rosa, with the nearest site the McDonald Mansion located approximately 2.85 miles southwest of the project site at 1015 McDonald Avenue.

- See Attachment I: Historic Preservation

### Noise Abatement and Control

Noise Control Act of 1953, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B

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**The project involves the development of noise sensitive uses and is located within 1,000’ of, and within line-of-sight of, an arterial roadway and a highway, but is not located within line-of-sight of an active railroad line.**

- HUD noise guidelines require exterior noise levels of no greater than 65 dBA without mitigation being required, and interior noise levels of 45 dBA. HUD requires that a noise assessment be performed on residential projects whenever a project is located within 3,000’ of an active railroad line and/or 1,000’ feet of an arterial roadway.

- The project is located on the corner of Highway 12 and Calistoga Road – Calistoga Road is classified as an arterial roadway so noise impacts from both Highway 12 and Calistoga Road must be taken into account.

- There are no active railroad lines within line-of-sight of the project site.

- The project site is approximately 8.5 miles southeast of the nearest municipal airport and is outside of all airport noise contours.
- Due to the project site’s location on the NW corner of Highway 12 and Calistoga Road, a HUD Noise Assessment Guidelines (NAG) noise study is required.

- The HUD NAG study utilized CalTrans traffic counts for Highway 12 and City of Santa Rosa traffic counts for Calistoga Road. The Calistoga Road does not break down traffic counts into automobiles, mid-size trucks and heavy trucks so the numbers used were extrapolated from a prior study. The assumption was made that the truck counts would be low due to the main delivery entrance for the shopping center being on Highway 12 and therefore already included in the traffic counts and noise levels for Highway 12. Additionally, Calistoga Road goes into a residential neighborhood so truck traffic should be low and primarily trucks that deliver to the two schools in the neighborhood. The total traffic count of 13,377 vehicles was broken down into 94% automobiles (12,574), 5% mid-size trucks (669), and 1% heavy trucks (134).

- The HUD NAG calculator produced a DNL of 61 on Calistoga Road, a DNL of 65 on Highway 12, and a combined DNL of 66 dBA.

- To supplement and enhance the HUD NAG study, an acoustic study was prepared by Illingworth and Rodkin (I&R). I&R found the following: “Considering the results of the Long- and short-term measurement surveys, a review of the project site plan1 and site topography, we have calculated the Ldn noise exposure at the eastern facades of Buildings 1 and 8 (closest to Calistoga Road) to be exposed to Ldn noise levels of 62 to 63 dBA, and the southern facades of Buildings 5, 6, 7, and 8 (closest to Highway 12) to be exposed to Ldn noise levels of 58 to 62 dBA at the 1st floor levels and to Ldn noise levels of 62 to 67 dBA at 2nd and 3rd floor levels.

- The results are fairly consistent across both studies with the I&R coming in slightly higher on both roads. The HUD NAG result was 61 DNL for Calistoga Road versus I&R at 62 – 63 DNL, and 65 DNL for Highway 12 versus I&R at 58 – 62 DNL at first floor levels and 62 – 67 DNL at upper levels. Where terrain is a factor, as in this case, well executed acoustic studies will naturally account for terrain while HUD NAG studies will not.

- I&R also estimated future noise levels with a 1 dBA increase across the board.

- The I&R study found that the noise levels in common use areas were in the acceptable level.

- Current noise levels at 2nd and 3rd stories will require mitigation to reduce interior noise levels to 45 dBA or
- As discussed by I&R, to reduce noise levels to acceptable levels “forced-air mechanical ventilation systems and sound-rated construction methods are normally required. Such methods or materials may include a combination of smaller window and door sizes as a percentage of the total building façade facing the noise source, sound-rated windows and doors, sound rated exterior wall assemblies, and mechanical ventilation so windows may be kept closed at the occupant’s discretion.” For more information see the I&R study in Attachment J.

### Sole Source Aquifers

<table>
<thead>
<tr>
<th>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</th>
<th>Yes</th>
<th>No</th>
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</thead>
<tbody>
<tr>
<td>The project is not located within an area designated by the EPA as being supported by a sole source aquifer.</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Verified by sole source aquifer map downloaded from: <a href="https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b">https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b</a> on 7.24.21</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

### Wetlands Protection

<table>
<thead>
<tr>
<th>Executive Order 11990, particularly sections 2 and 5</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>The project involves new construction within or adjacent to a wetland(s) habitat.</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>- Verified by: Wetlands Map downloaded from <a href="https://fws.gov/wetlands">https://fws.gov/wetlands</a> on 7.11.21</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

- There are two (2) jurisdictional wetlands on the project site: Austin Creek and a drainage ditch (or swale). The jurisdictional status was verified in 2008 and reverified in 2013.

- Austin Creek is a jurisdictional perennial stream that flows in a generally westerly direction across the northern border of the site. Austin Creek will be avoided with a setback and will not be affected by the project.

- The jurisdictional ditch flows in a northwesterly direction through the project site from a culvert beneath Calistoga Road to Austin Creek. The ditch appears to collect runoff from Calistoga Road and Highway 12 storm drains. During a July 2019 survey, wetland vegetation was observed throughout the extent of the ditch, with more dense vegetation observed along the western end. The ditch varies in width from approximately 2 to 5 feet.

- Project plans include significant enhancements to the ditch which will improve water quality and wetland habitat. These enhancements will require permits from ACOE, the Northcoast Regional Water Quality Control Board, USFW and CDFW, which will be obtained prior
Wild and Scenic Rivers

Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)

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<th>Yes</th>
<th>No</th>
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- The project is not within one mile of a listed section of a Wild and Scenic River.

- The proposed project site is not located within one mile of any listed section of any Wild and Scenic River.

Verified by the Wild and Scenic Rivers map downloaded from [https://www.rivers.gov/river-app/index.html?state=CA](https://www.rivers.gov/river-app/index.html?state=CA) on 7.11.21

- See Attachment M: Wild and Scenic Rivers

ENVIRONMENTAL JUSTICE

Environmental Justice

Executive Order 12898

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
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</table>

- The project is suitable for its proposed use; and with mitigations the project won’t be adversely affected by any pre-existing environmental conditions.

- The proposed 99-unit project has no aggregate Environmental Justice issues identified by the EPA EJSCREEN Report (Version 2019) or in this NEPA. EJ data was collected at the 0.125, 0.25, 0.5, 0.075, and 1-mile radii out from the project site. EJSCREEN has eleven (11) Environmental Indicators (EI) measuring environmental impacts. These EI are compared at the selected distances, with focus on the immediate project site identified by the 0.125 mile radius, to State, EPA Region and National (U.S.) levels. EJ data measures EI factors in raw data and in percentiles of the State, EPA Region, and U.S. The EPA recommends using the 80th percentile as a threshold for determining environmental considerations.

- Nine of the eleven EI (9/11) were below the 80th percentile in the project area compared to California, the EPA Region and the U.S. Of the two (2) that were above the 80th percentile Particulate Matter and Traffic Proximity were both over the 80th percentile at the U.S. level but significantly below the 80th percentile at the State and Regional levels. Based on this data, the project site does not suffer disproportionately from environmental issues.

- EJSCREEN also has several Demographic Indicators (DI) measuring demographic factors, the most relevant of which is the composite score of Demographic Index, which is a composite of Minority Population and Low-Income Population. The Demographic Index, Minority Population, and Low-Income Population, as well as all other DI, are below the 80th percentile compared to State, EPA Region, and U.S. levels.
- Based on this data and the results of this NEPA, we can conclude that neither the project site nor the neighborhood suffer disproportionately from adverse environmental effects on minority or low-income populations relative to the community at large.

- Additionally, the site is suitable for the proposed use and the project will benefit the minority and low-income populations by bringing 99 units of much needed affordable housing units to the neighborhood and community.

- See Attachment N: Environmental Justice
Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. All conditions, attenuation or mitigation measures have been clearly identified.

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

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

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>LAND DEVELOPMENT</td>
<td>2</td>
<td>The project is in conformance with the City of Santa Rosa General Plan and is a compatible land use consistent with zoning ordinances and is compatible in scale and urban design with surrounding uses and proposed uses.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Zoning: CG - General Commercial</td>
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<tr>
<td></td>
<td></td>
<td>Project Consistency: Consistent with zoning which allows residential development as part of mixed use developments and independent residential developments. The CG zoning district is consistent with the Retail and Business Services land use classification of the General Plan.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- General Plan: Retail and Business Services</td>
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<td></td>
<td></td>
<td>Project Consistency: Consistent with General Plan allowable land uses.</td>
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<tr>
<td></td>
<td></td>
<td>- The City will review and approve project design to ensure that the design is compatible with the neighborhood and meets all city design standards.</td>
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<td></td>
<td>- The project will produce no adverse urban impact as it is an urban redevelopment project within the City of Santa Rosa.</td>
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<td></td>
<td></td>
<td>See Attachment O: Land Development</td>
</tr>
</tbody>
</table>

16
Soil Suitability

- The City requires that a geotechnical engineering report be prepared and submitted as part of the City review and permitting process and shall require that the recommendations presented in the Report be incorporated into the project plans and specifications and implemented during construction and, furthermore, all applicable State and local building codes and City of Santa Rosa requirements are required to be complied with.

Slope

- The USDA NRCS slope rating shows the site ranging from 1.0 to 12.0, representing a site that ranges from relatively level with negligible slope to significant slope; therefore, slope is an issue that must be addressed in development of the site. The project developer is incorporating the slope into the project design.

- Verified through Web Soil Survey downloads from the USDA, NRCS website at http://websoilsurvey.sc.egov.usda.gov/App/HomePage.html downloaded 7.12.21

Erosion

- The majority of the subject property is of minimal to moderate slope (less than 10%), though, edges of the property, particularly along Austin Creek and a ± 1/2-acre section in the southwestern portion of the site exceed slopes of 10% or greater.

- An Initial Study/Mitigated Negative Declaration (MND) prepared for the “Shops at Austin Creek Project,” dated August 2015, previously proposed for development on the project site, determined that the potential for erosion on the site would have a Less Than Significant Impact. Although the MND was prepared for a commercial project, the MND found no geologic issues with the project site other than the presence of expansive soils are addressed in project design per requirements contained in the Geotechnical Investigation.

- See MND Section VI: Geology and Soils, b.

- The City will require that standard BMP’s be followed during construction to minimize construction related erosion from the site during construction activities.

Storm Water Runoff and Drainage

- The project is within the permit boundary of the National Pollution Discharge Elimination System (NPDES) MS4 Storm Water Permit, which regulates discharges into the watershed with the intent of reducing storm water pollution and protecting water quality. Pursuant to the active NPDES permit, the City of Santa Rosa and the County of Sonoma have adopted the Storm Water Low Impact Development (LID) Technical Design Manual. A Preliminary Storm Water Mitigation Plan (PSWMP) will be developed for the project to comply with the City's LID Manual. Once approved, implementation of the SWMP will assure compliance with NPDES regulations.
- The site slopes away from Sonoma Highway in a northerly direction towards Austin Creek. The property is bisected by a drainage swale that flows diagonally across the site from Calistoga Road in a northwesterly direction to Austin Creek. The existing culverts in the ditch will be replaced with clear span bridges along with other ACOE permitted enhancements to the ditch to enhance and preserve the wetlands while enhancing ditch flow rates to ensure sufficient capacity to avoid any flooding.

- The developer's engineer shall comply with all requirements of the latest edition of the City Standard Urban Storm Water Mitigation Plan Guidelines. Final plans shall include a Final Storm Water Mitigation Plan.

- **Standard City-Required Mitigation Measures**

  - Developer's engineer shall comply with all requirements of the City Standard Storm Water Mitigation Plan Guidelines using Low Impact Development (LID) Best Management Practices (BMPs).
  - Final Plans shall address the storm water quality and quantity along with a maintenance agreement or comparable document to assure continuous maintenance of the source and treatment. The North Coast Regional Water Quality Control Board may approve alternative mitigation.
  - Submit landscape and irrigation plans in conformance with the Water Efficient Landscape Ordinance adopted by the Santa Rosa City Council, Resolution No. 27518, on November 17, 2009. Plans shall be submitted with the Building Permit application. Submit the following with the above-mentioned plans: Maximum Applied Water Allowance (Appendix A) and Hydrozone Table (Appendix B).
  - A Final Standard Urban Storm Water Mitigation Plan (SUSMP) using Low Impact Development (LID) Best Management Practices (BMP) is to be included with the Building Permit application.
  - Alternative approaches to mitigating storm water impacts may be approved by the North Coast Regional Water Quality Control Board.

- The project is consistent with the City of Santa Rosa General Plan and will comply with all applicable City regulations and Planning Division conditions and those of the Regional and State Water Quality Control Boards.

- Per state requirements, post-construction runoff flows must be less than the pre-construction flows. Therefore, it is anticipated that the proposed project would not result in erosion, flooding or exceed water quality standards.

- Storm Water runoff will not be commingled with sewage.

- **See Attachment O: Land Development**
Earthquake Faults and Earthquake Potential

- Per the Department of Conservation website *Earthquake Zones of Required Investigation*, the site is not located in an Earthquake Zone.

Verified by map downloaded 8.23.21 from [https://maps.conservation.ca.gov/cgs/EQZApp/app/](https://maps.conservation.ca.gov/cgs/EQZApp/app/)

- Rockridge Geotechnical (RG) in a Geotechnical Investigation of the site dated April 16, 2020, states that the closest active faults in the area are the Maacama, Hayward and Rodgers Creek faults located approximately 3.9 miles north and 4.0 miles west, respectively.

- In respect to ground shaking resulting from an earthquake that could affect the project site, RG states the following: “The seismicity of the site is governed by the activity of the Hayward and Rodgers Creek faults, although ground shaking from future earthquakes on other faults will also be felt at the site. The intensity of earthquake ground motion at the site will depend upon the characteristics of the generating fault, distance to the earthquake epicenter, and magnitude and duration of the earthquake. We judge that strong to very strong ground shaking could occur at the site during a large earthquake on one of the nearby faults.”

Liquefaction Potential

- Per the Department of Conservation website, the site is not located in a Liquefaction Zone or a Liquefaction Landslide Overlap Zone.

Verified by map downloaded 8.23.21 from [https://maps.conservation.ca.gov/cgs/EQZApp/app/](https://maps.conservation.ca.gov/cgs/EQZApp/app/)

- RG determined that the potential for liquefaction and ground failure associated with liquefaction to be low stating that “[B]ased on the results of our analyses, we conclude the potential for liquefaction and ground failures associated with liquefaction, including lateral spreading, to occur at the site during a seismic event is low due to the high relative density and/or cohesion of the soil underlying the site.”

- RG reached the following conclusion: “From a geotechnical standpoint, we conclude the site can be developed as planned, provided the recommendations presented in this report are incorporated into the project plans and specifications and implemented during construction. The primary geotechnical concerns at the site are: 1) the presence of moderately to highly expansive near-surface soil, 2) a high groundwater table, and 3) providing adequate foundation support. We conclude the proposed buildings may be supported on either deepened footings or post-tensioned slabs-on-grade. For the deepened footing option, we recommend one foot of non-expansive fill consisting of either imported select fill or lime-treated on-site soil, be placed below concrete slab-on-grade floors.”

- The City shall require that the recommendations presented in the final geotechnical report submitted to and approved by the City be incorporated into the project plans and specifications and implemented during construction and,
furthermore, all applicable State and local building codes and City of Santa Rosa requirements are required to be complied with.

- Complying with the requirements stated above, the project is not expected to expose people or structures to substantial adverse effects, including the risk of loss, injury, or death as a result of geologic hazards including earthquakes, strong seismic ground shaking, or seismic-related ground failure such as liquefaction.

**Landslide Potential**

- Per the Department of Conservation website, the site is not located in a Landslide Zone or a Liquefaction Landslide Overlap Zone.

Verified by map downloaded 8.23.21 from https://maps.conservation.ca.gov/cgs/EOZApp/app/

The project will be required to comply with all City and State building codes and requirements set forth in the geotechnical report prepared for the project to reduce the potential for liquefaction.

**Tsunami and Seiches Potential**

- The project site is not located in a mapped Tsunami Inundation Area. The proposed project is located in the City of Santa Rosa outside of all tsunami zones in Sonoma County.

- The project is not located near any bodies of water large enough to produce seiches.

- Verified by California Department of Conservation, “Sonoma County Tsunami Inundation Maps” downloaded on 8.23.21 from https://www.conservation.ca.gov/cgs/tsunami/maps/sonoma

**Noise**

- Residential projects such as this will primarily generate three types of noise that may affect the project area: resident-generated noise - normal daily noises attributable to an apartment community, traffic-generated noise resulting from vehicular traffic to and from the project, and temporary construction-generated noise while the project is under construction.

- Santa Rosa City Code Section 17-16.030 establishes base noise level criteria for different types of land uses for use in comparing noise levels when determining if a violation has occurred.

- Section 17-16.040 states that “[N]otwithstanding any other provision of this chapter, and in addition thereto, it is unlawful for any person to wilfully make or continue, or cause to be made or continued, any loud, unnecessary, or unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. This Section contains 12 Standards for comparison to the base levels to determine if a violation has occurred.
Resident-generated noise

- Residents will be required to comply with the City’s noise ordinance contained in City Code Section 17-16. The base level used to determine whether a violation has occurred is 50 decibels from 10pm to 7am and 55 decibels from 7am to 10pm.

Traffic-generated noise

- W-Trans prepared a Focused Traffic Study for the Mahonia Glen Project, dated June 22, 2020, which estimated an increase of 219 vehicle trips per day, including 25 during the a.m. peak hour and 11 during the p.m. peak hour.

- The project site is located on the corner of a State highway, CA-12 (Sonoma Highway), and a major arterial roadway, Calistoga Road, and across Calistoga Road from a shopping center. Per CalTrans 2019 traffic counts, CA-12 carries 29,300 vehicles per day past Calistoga Road. An increase in 219 vehicle trips per day with only 25 during the a.m. peak hour and 11 during the p.m. peak hour will have minimal impact on existing traffic-generated noise levels in the area.

Construction-generated noise

- The project will temporarily increase community noise levels during construction due to normal noises attributable to construction activities. Noise generated during construction would vary throughout the construction period and on any given day, depending on the construction phase and the type and amount of equipment used at the construction site. The highest noise levels would be generated during grading of the site, with lower noise levels occurring during building construction and finishing. Overall, construction noise levels would be temporary, short-term and fluctuate throughout the construction period.

- During construction the project will be required to comply with City Code Section 17-16.120 regulates noise from machinery and equipment: “It is unlawful for any person to operate any machinery, equipment, pump, fan, air conditioning apparatus, or similar mechanical device in any manner so as to create any noise which would cause the noise level at the property line of any property to exceed the ambient base noise level by more than five decibels.”

- The project must comply with the City of Santa Rosa Municipal Code governing allowable construction hours and days. Compliance will reduce any impacts to nearby sensitive receptors (residents) to a less than significant level.

Wildland Fires Potential

- The project site is in an urbanized part of Santa Rosa with no wildland conditions. The project site is not located within a high fire hazard severity zone per the Cal-Fire Fire Hazard Severity Zone Viewer.

Verified by Cal-Fire “Fire Hazard Severity Zone Viewer” map downloaded 8.23.21 from https://egis.fire.ca.gov/FHSZ/

Emergency Response & Access
Construction period

The project has the potential to impact emergency response and access in the area during construction of the project. The project will be required to adopt standard traffic control procedures to minimize traffic congestion and traffic hazards. As required, construction flagging and signage, use of plates, and other safety measures shall be in conformance with Caltrans 2006 Manual of Uniform Traffic Control Devises. Other measures shall include:

- If temporary lane or street closures are required, the applicant shall contact emergency response providers (i.e., hospitals, police, fire, and ambulance) to determine if the streets impacted are considered primary routes.
- Where construction necessitates lane or street closures along emergency response routes, the applicant shall recommend and obtain approval of alternate routes or other means from the affected service providers, at a minimum of one week prior to construction.
- During construction, the applicant shall notify the service providers on a weekly basis of the timing, location, and duration of construction.
- The applicant shall maintain pedestrian and vehicular access to public facilities, businesses, and residences along the street during commute hours and shall minimize the closure of pedestrian and vehicular access at other times. Peak commute hours are between 7:00 AM - 9:00 AM and 4:00 PM - 6:00 PM.

Post-construction period - occupancy

- Once constructed and occupied, the project will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Hazardous Materials

- Essel Engineering & Consulting (Essel), which prepared a Phase I ESA on the project site, dated 4.1.21, found one Recognized Environmental Condition (REC), no CRECs or HRECs and one de minimis environmental condition in respect to the site – the same issues identified previously by Partner.

- Due to the property being occupied by a nursery and garden center circa 1950 until 2015, Essel determined that there is a potential that agricultural related chemicals such as pesticides, herbicides, and fertilizers, may have been used and stored onsite. Essel concluded that “the potential for residual pesticides in soil at the subject property represents a recognized environmental condition.”

- After further assessment, Essel concluded that “… design and installation of a vapor barrier and passive venting system beneath future buildings in this area of the Site may be appropriate.”

- Additionally, the project itself will have normal hazardous materials on site that would be commonly found in commercial and personal cleaning supplies and the medical offices will generate some hazardous materials in the form of used medical devices or materials. These offices will be RCRA generators and require proper storage and disposal of hazardous materials in conformation with City and State
regulations.

- *See the Contamination and Toxic Substances factor above, Attachment E, and Mitigation Measures and Conditions section at the end of this document.*

**Construction Site Safety**

- Following general construction safety practices, the project site will be fenced during construction and will have signs posted limiting unauthorized access and the potential for injury.

- *See Project Description; Attachment E: Contamination and Toxic Substances; and Attachment O: Land Development*

<table>
<thead>
<tr>
<th>Energy Consumption</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
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<tr>
<td></td>
<td>1</td>
<td>- The project will comply with Title 24 requirements for energy efficiency.</td>
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<tr>
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<td>- Units will have ENERGY STAR appliances including refrigerators, oven and ranges, and dishwashers.</td>
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<td>- <em>Verified by Devon Neary, Mid-Peninsula the Farm</em></td>
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<tr>
<th>Environmental Assessment Factor</th>
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<th>Impact Evaluation</th>
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</thead>
<tbody>
<tr>
<td>SOCIOECONOMIC</td>
<td></td>
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<tr>
<td>Employment and Income Patterns</td>
<td>1</td>
<td>- The project will create temporary construction employment, some of which is likely to be drawn from the local employment base.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Additionally, the project may create some new permanent jobs to operate the project and will create additional continuing contracting opportunities for local businesses that may also lead to some job creation, most likely for existing area residents but the effect will be less than significant.</td>
</tr>
<tr>
<td></td>
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<td>- The project will not result in the displacement of existing jobs.</td>
</tr>
<tr>
<td>Demographic Character Changes, Displacement</td>
<td>2</td>
<td>- The project is too small to instigate any demographic character changes in the community. Although there is no residency preference, the project is intended to meet an existing need in the community and serve existing residents of the project area, including 43 units for farmworkers rather than to attract and bring in new residents.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- The project site is vacant and, therefore, no persons or businesses will be displaced by the project.</td>
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</tbody>
</table>
**COMMUNITY FACILITIES AND SERVICES**

- The project will not have a residency preference and therefore may provide some units of housing to new residents of the area, but the project has been planned and is intended to provide a portion of the substantial need for affordable housing for existing low-income residents of the City of Santa Rosa and nearby areas rather than to provide housing to entice new residents to the area. As such, there may be some increase in demand on community services and facilities, including utilities, but there is not anticipated to be a significant increase in demand in these areas.

<table>
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<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
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</thead>
<tbody>
<tr>
<td>Educational and Cultural Facilities</td>
<td>2</td>
<td>Educational Facilities</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- The proposed 99-unit multi-family housing for low-income residents of the City of Santa Rosa could have an impact on educational facilities, though the project is designed to meet the needs of existing residents and is anticipated, therefore, to have minimal additional effect on surrounding educational facilities. Based on the per unit student generation factor utilized by the Santa Rosa City Schools District of 0.4 students per unit, the project’s 99 units is estimated to produce approximately 40 school age children.</td>
</tr>
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<td></td>
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<td>- The project will be served by two (2) school districts: Elementary school students, grades 1 – 6, will be served by the Rincon Valley USD, while middle school and high school students will be served by the Santa Rosa City Schools District.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- Elementary school students are within the boundaries to be served by Austin Creek Elementary, located at 1480 Snowy Egret Drive, approximately 1.7 miles east of the project site.</td>
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<tr>
<td></td>
<td></td>
<td>- Middle school students are within the boundaries to be served by Rincon Valley Middle School, located approximately 2.1 miles northwest of the project site at 4650 Badger Road.</td>
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<td></td>
<td>- High school students are within the boundaries to be served by Maria Carrillo High School, located approximately 1.3 miles north of the project site at 6975 Montecito Blvd.</td>
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<td>- Pursuant to Senate Bill 50 (SB 50), the project developer will be required to pay school impact fees to both the Santa Rosa City Schools District and the Rincon Valley USD. These fees have been established to offset potential impacts on school facilities. Therefore, although the project is likely to result in additional students and overcrowding within school districts’ facilities, payment of the fees mandated under SB 50 is the mitigation measure prescribed by the statute, is deemed full and complete mitigation.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>- No mitigation is required, and this would be a less than significant impact.</td>
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<tr>
<td>Cultural Facilities</td>
<td></td>
<td>Cultural Facilities</td>
</tr>
</tbody>
</table>
- The City of Santa Rosa, along with the County of Sonoma and other nearby communities, have an abundance of Cultural Facilities including public libraries, the Luther Burbank Center for the Arts, the Italian Cultural Center, the California Indian Museum and Cultural Center, and the Person Senior Wing at the Finley Community Center among many others.

- There are a number of libraries in the City and surrounding areas including law and medical libraries. The closest library to the project site is the Rincon Valley Regional Library which is located approximately 1.9 miles north of the project site off Calistoga Road at 6959 Montecito Blvd. The library is served by CityBus routes 4 and 7 which serve the project site as well.

- Santa Rosa Junior College is located at 1501 Mendocino Avenue in Santa Rosa, and Sonoma State University, which houses the Northwest Information Center of the California Historical Records Information System (CHRIS) is located just south of Santa Rosa in Rohnert Park.

- There are 16 properties located in the City and 67 properties located in Sonoma County that are listed in the National Register of Historic Places along with other California listed historic properties and places containing items of cultural and historic interest including the Charles M. Schulz Museum and Research Center.

- There are adequate cultural facilities in the City and surrounding areas to accommodate any potential increased usage generated by the project.

- Additionally, there is more than adequate public transportation serving these cultural facilities.

- See Attachment P: Community Facilities & Services

<table>
<thead>
<tr>
<th>Commercial Facilities</th>
<th>1</th>
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<tbody>
<tr>
<td>- The proposed project will potentially benefit nearby businesses because of increased business. Additionally, placing residents in more affordable housing provides more disposable income for spending on hard and soft goods which may benefit local businesses.</td>
<td></td>
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<tr>
<td>- There are adequate commercial facilities, including those across Calistoga Road from the project. Additionally, the project is not expected to negatively impact other businesses farther out from the project by significantly reducing current demand for their services. Commercial facilities in the vicinity of the project site are reasonably accessible to residents by private or public transportation.</td>
<td></td>
</tr>
<tr>
<td>- See Attachment P: Community Facilities and Services</td>
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</tbody>
</table>
Health Care

- The proposed project is not expected to significantly impact demand for health care services in the Santa Rosa area. Sufficient health care services are available in Santa Rosa to handle any potential increased demand. The net impact is anticipated to be low and less than significant.

- Additionally, it is anticipated that most future project residents currently reside in the area and, therefore, there is anticipated to be little to no net increase in demand for health care services.

- The two nearest hospitals to the site are the Providence Santa Rosa Memorial Hospital, located at 1165 Montgomery Drive, and Sutter Health, located at 30 Mark West Springs Road, both of which are approximately 3.4 miles from the project site.

- Providence Santa Rosa Memorial, which is located south of the project site, has a Level II Trauma Center and Emergency Department.

- Sutter Santa Rosa Regional Hospital, which is located west of the project site just off of Highway 16, which has 24-hour full-service emergency room and 84 acute care beds along with a heliport for airlifted patients.

- The next closest hospital to the project site is Oakcrest Hospital located at 3333 Chanate Road, approximately 3.8 miles west of the project site.

- The Kaiser Permanente Medical Center and Offices is located at 401 Bicentennial Way, approximately 5.3 miles west of the project site. The facility houses full 24-hour emergency services, full hospital and non-emergency medical offices and specialty departments.

- There are numerous other healthcare facilities in the city, including medical offices and other facilities associated with the hospital systems, small clinics, specialty providers, and private medical offices.

- See included maps depicting the many medical facilities in the area.

Social Services

- The project is not expected to significantly increase demand for social services in Santa Rosa. As noted above, the project is expected to provide affordable housing for households already residing within the project area and, therefore, there would be little increase in demand for services generated by the project. For any potential increase in city residents generated by the project, such services as are needed are offered in a wide variety by both public agencies and private non-profit agencies in both the city of Santa Rosa and surrounding areas in Sonoma County.

- Social Service agencies and programs in the area include those provided by the County of Sonoma Human Services Department, which include food assistance, healthcare, financial assistance, employment and job training programs, services
for protection from abuse and neglect for both adults and children, youth, senior and veterans’ programs and more.

- Other service providers include the YWCA, African American Self-Help, Redwood Caregiver Resource Center, Community Support Network, Voices Youth Center, Parent’s Place Family Resource, Community Action Partnership-Sonoma County, California Children’s Services, Catholic Charities of the Diocese of Santa Rosa, Friends Outside-Sonoma County, Social Advocates for Youth, and many more providers.

- See Attachment P: Community Facilities & Services

| Solid Waste Disposal / Recycling | 2 |

- **Exclusive Solid Waste Collection Franchise**

- The City of Santa Rosa and Recology, Inc. dba Recology Sonoma Marin maintain an exclusive franchise agreement for the collection of solid waste, organic waste, and recyclable materials in the city pursuant to Chapter 9-12 of the Santa Rosa City Code. The term of the agreement begins on January 1, 2018 and ends on December 31, 2032, for a term of fifteen (15) years.

- In the mid-1990s the permitted disposal area of the landfill increased from 40 to 67 acres. The additional acreage was designed with a liner system that meets EPA requirements for new municipal solid waste landfills. The new area replaced the former leachate evaporation ponds, which were cleaned and closed in 1997. The expansion increased the life of the landfill by approximately 30 years at that time, but the lifespan has been increased through implementation of additional waste reduction measures (City of Santa Rosa, April 2012, DEIR volume).

- **Low-Income Program**

- In Santa Rosa, low-income households may be eligible for a 15% discount. Participation in the Pacific Gas and Electric (PG&E) CARE program qualifies you for Recology’s low-income rate program.

- For more information solid waste and recycling please see Attachment P.

- The proposed project may generate additional solid waste, but the increase is not anticipated to be significant nor exceed the City’s ability to collect or recycle solid waste.

- The project is expected to comply with statutes and regulations related to solid waste, similar to other residential developments in the area. No known project elements would create unusual solid waste conditions.

See Attachment P: Community Facilities and Services
<table>
<thead>
<tr>
<th>Waste Water / Sanitary Sewers</th>
</tr>
</thead>
<tbody>
<tr>
<td>- The City of Santa Rosa will provide wastewater treatment for project generated wastewater. The project will not exceed wastewater treatment requirements as established by the Regional Water Quality Control Board and the NPDES permit.</td>
</tr>
<tr>
<td>- The site is already served by the City of Santa Rosa’s wastewater collection system which has over 500 miles of underground pipes bringing wastewater from homes, businesses and industry located within the City, as well as, within the cities of Rohnert Park, Cotati, Sebastopol, and the South Park Sanitation District to the Laguna Treatment Plant.</td>
</tr>
<tr>
<td>- The majority of our wastewater runs by gravity through a series of wastewater pipes to the Plant. The remainder of the wastewater, due to elevations that will not allow for gravity flow, must be lifted (pumped) to a location through force (pressurized) mains in the wastewater system that will allow the wastewater to return to a gravity wastewater main. The wastewater lift station system consists of 18 wastewater lift pump stations.</td>
</tr>
<tr>
<td>- Santa Rosa Water operates the Laguna Subregional Water Reclamation System which serves the residents in Santa Rosa, Rohnert Park, Cotati, Sebastopol, and unincorporated areas of Sonoma County. The hub of the Subregional Water Reclamation System is the Laguna Treatment Plant (LTP), which recycles wastewater from homes and businesses throughout the region. In 2020, 5.518 billion gallons of sewage received treatment, or an average of 15.1 million gallons of sewage per day. The facility also receives septic waste, landfill leachate, and high strength wastes (primarily grease and food production wastes) from the surrounding communities. On average, the Laguna Treatment Plant recycles approximately 6.6 billion gallons of wastewater each year. During dry to normal water years, nearly 100% of the tertiary treated recycled water is beneficially reused. Approximately two-thirds of the recycled water is sent to recharge the Geysers steam fields, producing renewable green energy, and removing nutrients from the Laguna de Santa Rosa watershed; the other one-third is used for urban and agricultural irrigation. By providing recycled water for irrigation, Santa Rosa Water helps to reduce diversions from the Russian River and reduce reliance on groundwater sources.</td>
</tr>
<tr>
<td>- LTP is currently permitted to treat up to 21.34 million gallons per day. Projects under Santa Rosa’s Subregional Water Reuse System Incremental Recycled Water Program (IRWP), which was originally undertaken in 2001, will be implemented as growth occurs, eventually increasing the plant’s capacity to 25.79 mgd, 18.25 mgd of which would be allocated to Santa Rosa.</td>
</tr>
<tr>
<td>- The project will produce a small increase in demand and will not require or result in the relocation or construction of new public or private utilities and service facilities.</td>
</tr>
</tbody>
</table>

- Extracted from: [https://srcity.org/1045/Water-Sewer](https://srcity.org/1045/Water-Sewer) and [https://srcity.org/1052/Water-Reuse](https://srcity.org/1052/Water-Reuse) and [City of Santa Rosa General Plan 2035 Draft EIR at](https://srcity.org/DocumentCenter/View/24327/Santa-Rosa-General-Plan-2035-PDF---October-2020) See Attachment P: Community Facilities and Services
Water Supply

- The City of Santa Rosa will supply water to the project and has adequate water supplies available to serve the proposed project. The following summary statement is from the City of Santa Rosa 2020 Urban Water Management Plan:

“The fundamental determination of the UWMP is that the City has or will have sufficient water resources to meet the City’s projected growth over the next 25 years under all anticipated hydrologic conditions, although customers should expect some demand reductions during dry years to ensure demands align with the City’s water supply.”

- The City of Santa Rosa receives the majority of its drinking water supply from the Sonoma County Water Agency (Sonoma Water), which provides water principally from the Russian River to retail water suppliers in Sonoma County and portions of Marin County. The City supplements this drinking water supply by operating two groundwater wells. Santa Rosa’s Water System provides water service to over 53,000 residential and commercial connections through over 600 miles of water main.

- The City has 24 reservoirs (tanks) located in higher elevations within Santa Rosa that provide valuable storage of 22 million gallons of drinking water. Due to elevation differences throughout the City, 25 - 30% of Santa Rosa’s water is boosted to these reservoirs by water pump stations to help to maintain adequate water pressure.

- To decrease the demand for potable drinking water and stretch our water supply, the City provides recycled water from its own Regional Water Reuse System to some irrigators. Additionally, the City has developed robust Water Use Efficiency programs, which play an essential role in water supply planning efforts by helping reduce current and future demand for water sustainably.


Public Safety - Police, Fire and Emergency Medical

- The City of Santa Rosa Police Department is the agency responsible for providing police services, including crime protection, prevention activities and community outreach and engagement throughout the City. The Santa Rosa police station is located at 965 Sonoma Avenue, approximately 3.7 miles southwest of the site (see map).

- While the Santa Rosa Police Department is the main provider of police services for the project area, on highways and within unincorporated areas, the California Highway Patrol and Sonoma County Sheriff’s Office assist with traffic enforcement and criminal law enforcement, respectively.

- The City participates in mutual aid with neighboring law enforcement agencies which is provided on an as-needed basis.
- Although the project has been proposed to provide affordable housing for existing City residents, the project could potentially result in increased population that could result in increased police protection service demands. However, this project and other future development and growth is not anticipated to result in the need to construct new or expanded police facilities.

- The Santa Rosa General Plan 2035 Draft Environmental Impact Report stated that “[P]roposed development anticipated under the proposed Santa Rosa General Plan 2035 would increase demand on police and fire protection by increasing population and urbanized land area” and found the projected impact to be “Less than Significant” and recommended no mitigations beyond implementation of the proposed General Plan 2035 policies.

- “Several objectives and policies in the proposed General Plan 2035 would reduce the increased demand on police . . . . They include the following:

  PSF-E-1: Provide for citizen safety through expedient response to emergency calls.

  PSF-E-2: Provide for the safety of Santa Rosa citizens by maintaining efficient, well trained, and adequately equipped police and fire personnel.

  PSF-E-3: Collaborate with other local jurisdictions in the provision of some police and fire services, if such collaboration can improve service levels and is cost effective.

  PSF-E-5: Assist neighborhoods and increase community contact through the Neighborhood Oriented Policing Program.”

- The City determined that the above policies and objectives would result in a less than significant impact on police services.

- In respect to cumulative impacts, the City determined that “[I]mplementation of Land Use policy provisions in the proposed General Plan 2035 would ensure that adequate response times and high-quality law enforcement services are maintained within the City of Santa Rosa. The police department receives funding from the General Fund, which is expected to grow as a result of further development in the city” resulting in the determination that “the cumulative law enforcement impact would be less than significant” and no mitigation was required.


Public Safety - Fire

- The project will be served by the City of Santa Rosa Fire Department (SRFD), Fire Station 6. Fire Station 6 is located at 205 Calistoga Road, less than 1 block north of the site. Additionally, Fire Station 9 and Sonoma County Fire District Station 5 are located at 91 Middle Rincon Road, approximately 0.7 miles west of the project site just off of Highway 12, approximately 8 minutes away.

- Per the City website –
“[T]he Santa Rosa Fire Department is an all risk fire department that provides services to mitigate the effects of a variety of emergency situations, including medical emergencies, physical entrapment, fires and releases of hazardous materials. The provision of these services is the responsibility of the Operations section of the Department. To provide a timely response, fire stations are strategically located throughout the City and the Roseland Fire District.

Our Fire Operations Bureau manages ten fire stations strategically located around the City. Santa Rosa's ten Fire Engines and two Truck Companies are located to meet the City's General Plan goal of the first resource arrival within 5 minutes of dispatch 90% of the time. A secondary goal is to provide a full assignment response to larger incidents within 8 minutes 90% of the time. The SRFD Fire Department responds to over 26,400 responses per year to fire, emergency medical, rescue and hazardous material incidents.

The Operations Bureau staffs a Hazardous Materials Response Team which provides emergency response services to isolate, contain, identify and mitigate unplanned and uncontrolled releases of hazardous substances within the Santa Rosa city limits. Additionally, the Bureau operates a Technical Rescue Unit for providing urban search and rescue, high/low angle rescue, confined space, and other specialized services to rescue trapped persons. More than one dozen personnel from SRFD serve on California [Urban Search and Rescue] (USAR) Task Force-4, a Specialized Federal Urban Search and Rescue Team that is mobilized during disaster situations. This Task Force and members of SRFD most recently were deployed for rescue operations during Hurricanes Katrina and Rita.

- The City of Santa Rosa has a wide assortment of potential fire problems, ranging from high-rise buildings, to extensive brush covered hills with homes intermixed, to industrial plants. The Department is equipped and trained for combating fires in each of these situations and all other types in-between. Additionally, Santa Rosa firefighters are trained and equipped to deal with technical rescue situations, such as vehicle accident entrapment, confined space rescue (such as building collapse), rescue from elevated locations and the rescue of persons trapped in swiftly moving water. Between emergency calls, firefighters present public fire safety programs, conduct fire safety inspections, maintain apparatus and equipment, participate in training classes and field training exercises.”

- “Several objectives and policies in the proposed General Plan 2035 would reduce the increased demand on ... fire protection. They include the following:
PSF-E-1: Provide for citizen safety through expedient response to emergency calls.

PSF-E-2: Provide for the safety of Santa Rosa citizens by maintaining efficient, well trained, and adequately equipped police and fire personnel.

PSF-E-3: Collaborate with other local jurisdictions in the provision of some police and fire services, if such collaboration can improve service levels and is cost effective.

PSF-E-4: Require implementation of fire protection measures, such as non-combustible roofing materials and fire sprinklers in areas of high fire hazard.

PSF-E-6: Develop a new fire station in southeast Santa Rosa.

PSF-E-7: To better serve the community, move the fire station on Parker Hill Road to a new location near Fountaingrove Parkway and Parker Hill Road.

- The City determined that the above policies and objectives would result in a less than significant impact on fire protection services.

- In respect to cumulative impacts, the City determined that “[I]mplementation of proposed General Plan 2035 policy provisions, which include mutual aid agreements with surrounding communities, and the continued funding from property taxes, developer fees, and other alternative sources of funding would provide sufficient resources to serve the projected needs of the Fire Department under buildout conditions, including future development within the Planning areas. Individual development projects would be subject to Fire Department review and approval. Therefore, the cumulative fire protection and emergency medical services demand increases in the city would be offset and would result in a less than significant impact” and no mitigation was required.


- The project will be required to comply with all City of Santa Rosa and California Fire Code requirements which will be incorporated into project plans and verified during Plan Check by the Santa Rosa Fire Department. Implementation of these requirements will reduce any increased impacts on the Fire Department and increase the health and safety of future residents.

Public Safety – Emergency Medical Services

- As discussed above under Public Safety – Fire, emergency medical services are provided by the City of Santa Rosa Fire Department and the marginal increase in demand this project may produce will have the same limitations and impacts as discussed above.

- Per the City’s website, the majority of Fire Department responses are for emergency medical services.

“All Santa Rosa Fire Department personnel are trained to the Emergency Medical Technician (EMT) level and are proficient in the use of emergency cardiac
defibrillators which are carried on all fire apparatus. Additionally, 48 suppression personnel are trained as paramedics and are capable of Advanced Life Support techniques. Suppression personnel receive extensive training in emergency medical care, fire suppression, hazardous materials response, rope rescue, confined space rescue, swift water rescue, vehicle extrication techniques, and multi-casualty incidents.

The Santa Rosa Fire Department works in conjunction with American Medical Response and the Coastal Valley Emergency Medical Services Agency to continuously monitor and improve the delivery of emergency medical care within [its] system.”

- Currently all fire department suppression equipment is staffed with paramedics.

- City of Santa Rosa website downloaded 9.27.21 from: https://ca-santarosa.civicplus.com/393/Fire

- The site plan is required to provide adequate ingress and egress for emergency vehicle access, which will be verified by the Santa Rosa Fire Department during Plan Check.

<table>
<thead>
<tr>
<th>Parks, Open Space and Recreation</th>
<th>2</th>
</tr>
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- The City of Santa Rosa Recreation & Parks Department operates and maintains over 1,100 acres of City park lands, open space, civic space and roadside landscaping along with over 10,000 trees. City crews care-take 72 neighborhood and community parks and a large number of special recreational and historic facilities, including Howarth Memorial Park, Luther Burbank Home & Gardens, Church of One Tree, DeTurk Round Barn, Santa Rosa Rural Cemetery, Finley Community Center with the Person Senior Wing, Steele Lane Community Center, Ridgway Swim Center, Finley Aquatic Center and the Bennett Valley Golf Course.

- City residents also have the opportunity to access many state and county park facilities. Sonoma County Regional Parks includes more than 50 parks and beaches from Petaluma to Gualala and Sonoma to Bodega Bay. Many offer wild landscapes and miles of trails. Others feature sports fields, playgrounds, and campgrounds. Regional Parks also manages the county's largest ocean marina and largest extracurricular environmental education center.

- In addition to City and County parks, there are 17 State Parks, Regional Parks, Historic Parks, State Beaches and Nature Preserves in Sonoma County accessible to project residents.

- See Santa Rosa City Parks @ https://srcity.org/1564/Parks and County of Sonoma Parks @ https://parks.sonomacounty.ca.gov/Learn/About-Us/

- Although the project may produce a small increase in demand on parks and recreation facilities but, as discussed above, there are numerous parks in the City of Santa Rosa and the County of Sonoma to handle any increase in demand.

See Attachment P: Community Facilities and Services
Accessibility

- The project is required to and will meet all federal, including the Department of Housing and Urban Development, state and local regulations governing accessibility including Americans with Disabilities Act compliance and Section 504 compliance, with both mobility and sensory units.

- The site will be served by Santa Rosa CityBus. Route 4/4B connects to downtown Santa Rosa, Rincon Valley Community Park, Maria Carrillo High School, and Rincon Valley Library, among other destinations. The site is also located on Sonoma County Transit Routes 30 and 34, which connect to downtown Santa Rosa and the City of Sonoma. Additionally, the site is bordered by Austin Creek to the north.

Transportation

Temporary Impacts

- There will be a temporary increase in traffic from contractors building the project that will resolve once construction is complete.

Permanent Impacts

- W-Trans prepared a Focused Traffic Study for the Mahonia Glen Project, dated June 22, 2020, in accordance with criteria establish by the City of Santa Rosa and consistent with standard traffic engineering techniques. A full Traffic Impact Study for The Shops at Austin Creek, a project previously planned at the site, was prepared and dated 7.17.14. Traffic impacts for the two projects were compared and it was determined that he currently proposed project, with its 99 residential units and 128 parking spaces, will produce lower traffic impacts than the previously proposed and studied The Shops project.

- Per the W-Trans Study, the project will have two access driveways, one on Calistoga Road and one on Sonoma Highway and the project proposes several improvements to surrounding roadways consistent with the prior studies recommendations.

- Trip generation was estimated to be an increase of 219 per day, including 25 during the a.m. peak hour and 11 during the p.m. peak hour. City criterion under the streamlined SB 35 approval process allows the focused study as the project will produce fewer than 50 net new trips during either peak hour. Trip generation under this proposed project is substantially lower than estimates for The Shops project.

- The Study evaluated and provided several Findings and Recommendations in respect to Pedestrian Facilities, Bicycle Facilities, Bicycle Parking, Transit Facilities, Site Access, Sight Distance, On-Site Circulation and left-turn warrants and made the following overall conclusions and recommendations for implementation during project planning and development:
The proposed project would be expected to generate a total of 219 new trips per day compared to the historical nursery use, with 25 new trips during the a.m. peak hour and 11 trips during the p.m. peak hour. However, compared to the previously approved “The Shops at Austin Creek” project, the proposed housing development would generate 83 fewer trips during the a.m. peak hour and 149 fewer p.m. peak hour trips.

The applicant should include the previously proposed improvements outlined for the approved Shops at Austin Creek project and as listed below:

- Widen and restripe the southbound Calistoga Road approach to SR 12 to include a right-turn lane, shared through/left-turn lane, and a left-turn lane.
- Construct sidewalks and provide Class II bike lanes on SR 12 and Calistoga Road along the project frontages.
- Provide a crosswalk across the west leg of SR 12/Calistoga Road with associated pedestrian phasing.
- Restripe the segment of Calistoga Road north of SR 12 to eliminate a portion of the two-way left-turn lane and provide left-turn pockets for the proposed driveway and the existing St. Francis Shopping Center driveway.
- Construct a bus stop and bus pull-out on SR 12 west of Calistoga Road.

Additional Recommendations:

- Secure parking facilities for at least 25 bicycles should be provided on-site.
- Because landscaping and signs can impede clear sight lines, any new plantings or signs should be designed to ensure that adequate sight lines will be maintained.
- As indicated on the site plan, the project should include provision of “keep clear” markings on Calistoga Road at the location of the proposed project driveway.

With implementation of the Report’s Recommendations, the project is anticipated to result in a less than significant impact on transportation.

See Attachment R - Transportation
### NATURAL FEATURES

<table>
<thead>
<tr>
<th>Environmental Assessment Factor</th>
<th>Impact Code</th>
<th>Impact Evaluation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unique Natural Features, Water Resources</td>
<td>2</td>
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</tr>
</tbody>
</table>

#### Unique Natural Features

- As discussed in the Wetlands Protection Factor above, there are two (2) jurisdictional wetlands on the project site: Austin Creek and a drainage ditch (or swale).

- Austin Creek, a jurisdictional perennial stream that flows in a generally westerly direction across the northern border of the site, will be avoided with a setback and will not be affected by the project.

- The jurisdictional ditch flows in a northwesterly direction through the project site and wetland vegetation has been observed throughout the extent of the ditch, with more dense vegetation observed along the western end. The ditch varies in width from approximately 2 to 5 feet.

- Project plans include significant enhancements to the ditch which will improve water quality and wetland habitat. These enhancements will require permits from ACOE, the Regional Water Quality Control Board, and CDFW.

- Elevation varies throughout the site. This variance will be integrated into project design to enhance the project.

- See Project Information, Aerial photos, USGS map and the Wetlands Protection Factor above and related attachments.

#### Water Resources

- The project will be connected and served by the City of Santa Rosa’s water system and any minimal landscaping will be irrigated with domestic water or reclaimed water. Furthermore, implementation of the project would not deplete groundwater supplies or interfere with groundwater recharge resulting in groundwater loss. The project will not utilize on-site wells to provide water to the project.

- See Water Supply factor above

- See “Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff” factor above for information on the issue of storm water runoff.

- See the “Waste Water / Sanitary Sewers” factor above for information on the issue of wastewater collection and treatment. The project will not utilize an on-site septic system.

- See Attachment G: Farmland and USGS map
Vegetation

- The project site is located at the eastern edge of Santa Rosa within the city limits. Per the 8.7.19, 1 Calistoga Road Updated Biological Resources Report prepared by LSA and discussed above in the Endangered Species factor:

“Except for the riparian vegetation along Austin Creek and scattered native coast live oak (Quercus agrifolia) trees, the site has been highly disturbed due to prior use at the site. The project site previously contained a retail nursery, an unoccupied residence and outbuildings, a cell tower, and yard space. One small wood shed remains on the site. Several native and non-native trees are growing on the site. The eastern and southern sections of the site contain a paved parking lot, and compacted soil and gravel. The project site was being grazed by goats during the July 2019 survey.”

The following excerpts from the “Vegetation” section of the report describe various portions of the site: “Austin Creek and its associated riparian vegetation form the northern project site boundary. Several ornamental trees and native coast live oaks are growing at or near where the nursery and house were present. The majority of the western section of the site is characterized by ruderal (weedy) grasses and forbs and scattered valley and coast live oak. A jurisdictional drainage ditch, which crosses the center of the site and flows in a northwesterly direction, supports several wetland species [and] [T]he grasslands and gravel areas support non-native ruderal (weedy) vegetation.”

- Site preparation and construction of the proposed project will result in a significant adverse impact on existing vegetation on-site, as construction of the project will require removal of much of the existing vegetation during site preparation. With the exception of the city tree ordinance discussed below, all the vegetation to be removed, ruderal (weedy) grasses and forbs, is not protected and, therefore, removal of it is considered a less-than-significant impact.

- Santa Rosa City Code, Chapter 17-24 Trees requires a permit to remove or relocate heritage trees if the trunk diameters are 4” or greater and may require replacement if relocation is not possible. All site trees that cannot be preserved, including the scattered valley oak and coast live oak noted by LSA, will be replaced if they meet size requirements. Horticultural Associates surveyed the site and prepared a Tree Inventory Report, dated November 16, 2021, which identified 72 trees that can be preserved and 71 that require removal.

- The project is required to comply with all Santa Rosa City Code, Chapter 17-24 requirements for the removal, relocation, and replacement of trees.

Wildlife

- LSA states in its Report that “The developed nature of the site supports wildlife species that are adapted to urban communities.” A number of common bird species were observed on the site but no “wild mammal species” were observed, though LSA notes that several are likely to be found on the site. Only one reptile was observed on the site, the Western Fence Lizard, though LSA noted that others may be found on the site.
- More information on wildlife can be in the Endangered Species factor above and in the LSA Report. With the mitigations discussed there, development of the project will not have a significant impact on wildlife.

- See Attachment F: Endangered Species

| Other Factors | 2   | N/A |

|  |

**Additional Studies Performed:**

No additional studies were performed for preparation of this NEPA other than those referenced in specific factors and below.

**Field Inspection (Date and completed by):**

Field Inspections were done by the preparers of reports used in this NEPA including:

- LSA – Archaeologist John Kelley, May 15, 2020
- ASC – Project Coordinator Ruth Rhoades and Staff Archaeologist Mike Newland, November 23, 2004
- Essel Environmental – Tom Sparrowe, March 19, 2021
- LSA – November 23 & December 1, 2004, December 18, 2014, and July 23, 2019
- Horticultural Associates – November 2021

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

The following were used for each item as applicable:

- USGS, Santa Rosa Quadrangle 7.5-Minute series topographic map
- Google Earth and Google Maps

**STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6:**

**Airport Hazards**
- 24 CFR Part 51 Subpart D
- NEPAssist Airport Map
- Google Earth

**Coastal Barrier Resources**
- Not applicable in California

**Flood Insurance**
- FIRM map 06097C0734E, dated December 2, 2008
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

Clean Air
- EPA Greenbook “Currently Designated Nonattainment Areas for all Criteria Pollutants at https://www3.epa.gov/airquality/greenbook/ancl.html#CALIFORNIA, downloaded 7.11.21
- Giroux & Associates, NEPA Conformity Analysis, dated October 11, 2021

Coastal Zone Management Act
- California Coastal Zone Map downloaded from https://www.coastal.ca.gov/maps/czb/, downloaded 7.26.21

Contamination and Toxic Substances
- Essel Environmental – Phase I ESA Report, dated April 1, 2021
- Essel Environmental – Soil and Soil Vapor Investigation, dated August 28, 2019

Endangered Species Act
- USFWS – Critical Habitat for Threatened & Endangered Species, downloaded 7.26.21
- LSA Associates – One Calistoga Road Updated Biological Resources Report, dated August 7, 2019
- LSA Associates – The Shops at Austin Creek Updated Biological Resources Report, dated January 5, 2014
- LSA Associates – Biological Assessment, dated December 2021

Explosive and Flammable Hazards
- Essel Environmental – Phase I ESA Report, dated April 1, 2021
- CalEPA Database: https://siteportal.calepa.ca.gov/nsite/map/help
- HUD Exchange, ASD Tool at https://www.hudexchange.info/environmental-review/asd-calculator/
- Google Earth

Farmlands Protection
- USDA, NRCS website at https://websoilsurvey.nrcs.usda.gov/app/HomePage.htm, downloaded 7.12.21
- CA Department of Conservation, CA Important Farmland Finder at https://maps.conservation.ca.gov/DLRP/CIFF/, downloaded 7.12.21

Floodplain Management
- FIRM map 06097C0734E dated December 2, 2008

Historic Preservation
- Ms. Julianne Polanco, State Historic Preservation Officer
- California Historical Resources Information System
- LSA – Memorandum – Cultural Resource Study, dated August 2, 2021
- Tom Origer & Associates – Cultural resources review of previous work completed on the property at 5171 - 5173 Highway 12, Santa Rosa, Sonoma County, dated 10.29.14
- Anthropological Studies Center – A Cultural Resources Study of Approximately 5.23 Acres, dated December 2004
- Native American Heritage Commission
- Tribal Directory Assessment Information (TDAT) – Contact Information for Tribes of Sonoma County, CA
- Consultation letters to all on the NAHC TDAT Contacts List on 8.5.21
- National Register of Historic Places (NRHP) Records Search
- The USGS, Santa Rosa Quadrangle 7.5-Minute series topographic map
- Santa Rosa Land Grant Map
- Google Aerial Photos
Noise Abatement and Control
- RSH Team – Charles M. Schulz Sonoma County Airport Environmental Impact Report – Noise Contours
- NEPAssist Railroad Map
- Illingworth & Rodkin, Inc. – Noise and Vibration Assessment, The Shops at Austin Creek, dated August 12, 2014
- Illingworth & Rodkin, Inc. – Mahonia Glen Environmental Noise Assessment, dated October 11, 2021
- Santa Rosa City Code, Chapter 17-16 Noise
- Charles M. Schulz Sonoma County Airport Noise Management Pilot Guide
- CalTrans Traffic Counts Website: https://dot.ca.gov/programs/traffic-operations/census
- City of Santa Rosa – Calistoga Road - Sonoma Hwy To Dupont Traffic Counts, 02-2019
- Google Earth

Sole Source Aquifers
- EPA Region 9 Sole Source Aquifers Map downloaded from https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/, downloaded on 7.24.21

Wetlands Protection
- Wetlands Map downloaded from https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/ downloaded on 7.11.21
- Holland & Knight – SB 35 Letter, dated November 5, 2019
- LSA Associates, Inc. – Request to be on Interagency Meeting Agenda – Letter to ACOE, dated February 19, 2020

Wild and Scenic Rivers Act
- Wild and Scenic Rivers list downloaded from https://www.rivers.gov/river-app/index.html?state=CA on 7.24.21

ENVIRONMENTAL JUSTICE

Environmental Justice

Environmental Assessment Factors
- NEPAssist
- Santa Rosa City Code
- City of Santa Rosa Website
- Santa Rosa General Plan 2035 Environmental Impact Report, dated March 2009
- City of Santa Rosa Recreation and Parks Department – Business and Strategic Action Plan, April 2008
- City of Santa Rosa Parks Website
- City of Santa Rosa Measure M – Parks for All
- County of Sonoma Regional Parks Website
- City of Santa Rosa Fire Department Website
- City of Santa Rosa Police Department Website
- Santa Rosa Schools Website
- Sonoma County Human Services Department Website
- Sonoma County 2020-21 Zero Waste Guide
List of Permits Obtained:

No permits obtained at this time. Standard construction-related permits will be obtained prior to the commencement of construction.

Public Outreach [24 CFR 50.23 & 58.43]:

- The developer, Housing, held two community meetings: 9/5/2019 and 11/12/2019.
- Consultation letters mailed to tribal contacts and the State Historic Preservation Officer
- Sonoma County Housing Authority, 5.10.21

Cumulative Impact Analysis [24 CFR 58.32]:

No factors were found to be significant on a stand-alone basis; there are no other actions requiring aggregation with this action, and; there are no cumulative impacts when considering all factors as a whole that would result in the Finding being other than No Significant Impact.

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

The project developer, Mid-Peninsula the Farm, proposed this project for this location to the City. As the proposed project is consistent with the City of Santa Rosa’s General Plan and meets a significant City-identified need in respect to the provision of affordable housing for low- and very low-income residents of the City and placing residents near existing City services and transportation, no other alternatives to the proposed action were considered.
No Action Alternative [24 CFR 58.40(e)]:

There are few benefits to be obtained by not developing the site as proposed. The project will increase the much-needed supply of housing in the project area with existing public infrastructure and without significantly impacting existing public services. Not developing this project will delay the development of much needed affordable housing in the community and any subsequent project proposed for this site may not provide affordable housing as this project will do.

Summary of Findings and Conclusions:

The City of Santa Rosa finds that the project will have no significant effect on the quality of the human environment. In several areas, implementation of City and other agency required measures during construction, along with other conditions required for City approval of the project, will not only result in the project having no significant impact on the quality of the human environment but will have a beneficial impact in several areas including the provision of affordable housing for City residents near services and transportation.

The project will benefit the City of Santa Rosa and low-income residents needing affordable rental housing by providing quality low-income housing without exposing residents to hazardous environmental conditions and will improve their quality of life.
**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure</th>
</tr>
</thead>
</table>
| **Historic Preservation** | Based on the Code of Federal Regulations Title 36, Volume 3 (Rev. July 1, 2001), if archaeological remains are exposed during ground construction, work within five meters of the radius of the find(s) must be halted and a qualified archaeologist retained to evaluate the findings. If human remains are encountered during excavations associated with this project, all work must halt, and the County Coroner must be notified (Section 7050.5 of the California Health and Safety Code). The coroner will determine whether the remains are of forensic interest. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, the coroner will contact the Native American Heritage Commission (NAHC).

The NAHC will be responsible for designating the most likely descendant (MLD), who will be responsible for the ultimate disposition of the remains, as required by Section 5097.98 of the Public Resources Code. The MLD should make his/her recommendations within 48 hours of their notification by the NAHC. This recommendation may include A) the nondestructive removal and analysis of human remains and items associated with Native American human remains; (B) preservation of Native American human remains and associated items in place; (C) relinquishment of Native American human remains and associated items to the descendants for treatment; or (D) other culturally appropriate treatment. |
| **Clean Air** | During grading and construction, sensitive receptors will potentially be subject to increased pollutant concentrations, primarily from blowing dust associated with ground disturbances and construction equipment emissions. The effect will be mitigated by requiring the developer to comply with the City Code Title 20, Division 3, Chapter 20-30.090, including the following:

C. **Air emissions.** No visible dust, gasses, or smoke shall be emitted, except as necessary for the heating or cooling of structures, and the operation of motor vehicles on the site.

E. **Dust.** Activities that may generate dust emissions (e.g., |
construction, grading, commercial gardening, and similar operations) shall be conducted to limit the emissions beyond the site boundary to the maximum extent feasible. Appropriate methods of dust management shall include the following, subject to approval by the City Engineer.

1. Scheduling. Grading shall be designed, and grading activities shall be scheduled to ensure that repeat grading will not be required, and that completion of the dust-generating activity (e.g., construction, paving or planting) will occur as soon as possible.

2. Operations during high winds. Clearing, earth-moving, excavation operations or grading activities shall cease when the wind speed exceeds 25 miles per hour averaged over one hour.

3. Limiting the area of disturbance. The area disturbed by clearing, demolition, earth-moving, excavation operations or grading shall be minimized at all times.

4. Dust control. Fugitive dust emissions shall be controlled by watering a minimum of two times each day, paving or other treatment of permanent on-site roads and construction roads, the covering of trucks carrying loads with dust content, and/or other dust-preventive measures (e.g., hydroseeding, etc.).

5. Revegetation. Graded areas shall be revegetated as soon as possible, but within no longer than 30 days, to minimize dust and erosion. Disturbed areas of the construction site that are to remain inactive longer than three months shall be seeded and watered until grass cover is grown and maintained; and

6. Fencing. Appropriate fences or walls shall be constructed to contain dust within the site as required by the City Engineer.

Other Feasible Mitigation Measures:

- Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).
- Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro seed area.
- Haul trucks shall maintain at least 2'0" of freeboard.
- Cover inactive storage piles.
- Sweep streets if visible soil material is carried out from the construction site.
- Post a publicly visible sign which specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours.

### Noise Abatement and Control

Noise Control Act of 1953, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B

- Noise mitigations approved by the City will be required to reduce interior noise levels to 45 dBA or lower.

- The applicant shall prepare an Operation and Maintenance Plan and schedule, to be submitted to the City of Santa Rosa, Planning Department, which outlines the procedures and timing to periodically inspecting seals and repairing or replacing building components when their performance diminishes along windows and doors fronting Highway 12 and Calistoga Road as shown in the attached Illingworth & Rodkin, Inc. Environmental Noise Assessment, dated October 11, 2021, to maintain the required do not exceed day-night average noise level of 45 decibels.

### Hazards and Nuisances Including Site Safety and Noise

- The project consists of new construction and site work that is subject to the City of Santa Rosa Municipal Code for hours and days of construction. This will reduce any impact to nearby sensitive receptors (residents) to less than significant.

### Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff

The recommendations presented in the Geotechnical Investigation prepared by Rockridge Geotechnical dated April 169, 2020, are required to be incorporated into project plans and specifications and implemented during construction.

### Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff

A Stormwater Pollution Prevention Plan prepared by a registered engineer or qualified stormwater pollution prevention plan developer will be required by the City to be submitted as an integral part of the grading plan. Additionally, all grading activities and placement of fill will be completed in accordance with the City’s Erosion and Sediment Control Notes and Grading Notes.

### Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff

The project is required to comply with all applicable City regulations and planning division conditions including those of the Regional and State water quality control boards.

The project is required to comply with all requirements of the National Pollutant Discharge Elimination (NPDES) Storm Water Permit issued jointly to the City, the County of Sonoma, and the Sonoma County Water Agency by the North Coast Regional Water Quality Control Board.
Regional Board), the enforcement arm of the State Water Resources Control Board (Water Board).

The Project is also required to comply with the latest version of the City’s Storm Water Technical Design Manual.

<table>
<thead>
<tr>
<th>Contamination and Toxic Substances</th>
<th>The Phase I ESA prepared for the Project identified a potential for vapor intrusion in the northeast corner of the site. Due to the potential for vapor intrusion, the Project will be required to install a vapor barrier and passive venting system beneath any buildings to be located in the that area of the site.</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 CFR Part 50.3(i) &amp; 58.5(i)(2)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Vegetation, Wildlife</th>
<th>The project is required to comply with all Santa Rosa City Code, Chapter 17-24 requirements for the removal, relocation, and replacement of trees.</th>
</tr>
</thead>
</table>

Determination:

☒ Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

☐ Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature: Roy Hastings/owner/R. J. Hastings & Associates, LLC

Date: 1/19/22

Name/Title/Organization: Roy Hastings/owner/R. J. Hastings & Associates, LLC

Certifying Officer Signature: Clare Hartman

Date: 1/20/2022

Name/Title: Clare Hartman, Deputy Director Planing and Economic Development

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