

5. Revisions to the Draft EIR

This chapter includes text revisions to the Draft EIR, including the goals, policies, and actions in the Draft General Plan 2050, that were made in response to agency and organization comments, as well as tribal consultation with representatives from the Federated Indians of Graton Rancheria and Lytton Rancheria and staff-directed changes. These text revisions include typographical corrections, insignificant modifications, amplifications and clarifications of the Draft EIR. In each case, the revised page and location on the page is presented, followed by the textual, tabular, or graphical revision. Underlined text represents language that has been added to the EIR; text with ~~strikethrough~~ represents language that has been deleted from the Draft EIR. None of the revisions to the Draft EIR constitutes significant new information as defined in CEQA Guidelines Section 15088.5; therefore, the Draft EIR does not need to be recirculated.

On Wednesday, January 22, 2025, the Bay Area Air District (Air District), formally the Bay Area Air Quality Management District (BAAQMD), announced its new name and logo to honor the Bay Area's diversity, environmental justice initiatives, and commitment to clean air for all amongst other reasons. The agency requests that they be referred to as the "Bay Area Air District" or the "Air District" rather than using an acronym. Due to the number of times and locations that the Air District is referenced in the EIR, this change is assumed to occur and is not shown in ~~strikethrough~~ or underlined text in this chapter.

CHAPTER 1, INTRODUCTION

The first paragraph in Section 1.1, *Proposed Action*, on page 1-1 of the Draft EIR is hereby amended as follows:

If approved by the Santa Rosa City Council, the proposed project would replace the City's existing General Plan, which was last comprehensively updated in 2009 and has a buildout horizon of 2035. The proposed project is intended to guide development and conservation in the city. The proposed General Plan 2050 would build off the current General Plan 2035 and provide a direct framework for the upcoming changes in Santa Rosa and the expected growth in the coming decades; as well as land use, transportation, and conservation decisions through the horizon year of 2050. Because California Government Code Section 65860 requires the city's Specific Plans and Zoning Code to be consistent with its General Plan, the proposed project would also introduce amendments to the maps in the North Station Area Specific Plan and ~~Downtown Station Area Specific Plan~~ Roseland Area/Sebastopol Road Specific Plan, as well as new zoning provisions including zoning map revisions on certain parcels throughout the city to ensure that the Specific Plans and Zoning Code conforms to the proposed General Plan 2050. Lastly, the proposed project would replace the City's existing Climate Action Plan, which was adopted in 2012, with a GHG Reduction Strategy that would serve as the City's strategic plan to reduce community-wide GHG emissions through 2045 and beyond.

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CHAPTER 2, EXECUTIVE SUMMARY

The second paragraph in Section 2.2, *Summary of Proposed Project*, on page 2-4 of the Draft EIR is hereby amended as follows:

The City determined that the current General Plan 2035 provided a good foundation for General Plan 2050. The current General Plan 2035 included a comprehensive review process, resulting in a broad range of community goals and policies. Many of the community issues vetted in the current General Plan 2035 are still relevant, well addressed, and do not require major change. Therefore, the approach to the proposed General Plan 2050 is not a comprehensive update, rather, it builds off of the current General Plan 2035 by incorporating the topics that are now required by State mandate and revises relevant policies and programs to meet those requirements. It also incorporates regional forecasts for 2050, thus moving the planning horizon forward by 15 years from the 2035 horizon year of the current General Plan. Because California Government Code Section 65860 requires the city's Specific Plans and Zoning Code to be consistent with its General Plan, the proposed project would also amend the maps in the North Station Area Specific Plan and ~~Downtown Station Area Specific Plan~~ Roseland Area/Sebastopol Road Specific Plan, as well as SRCC Code. The proposed project would also replace the City's existing 2012 Climate Action Plan with a GHG Reduction to reduce community-wide GHG emissions through 2045 and beyond. Chapter 3, *Project Description*, of this Draft EIR includes a detailed description of the proposed project

Please see Chapter 2, *Executive Summary*, of this Final EIR for revisions to Table 2-1, *Summary of Significant Impacts and Mitigating Policies and Actions*.

CHAPTER 3, PROJECT DESCRIPTION

The text in Section 3.7.1.4, *Land Use and Zoning Map Revisions*, on page 3-16 of the Draft EIR is hereby amended as follows:

The proposed General Plan 2050 land use map is shown on Figure 3-3, *Proposed General Plan 2050 Land Use Map*. The proposed project includes revisions to the land use designations and as required, zoning districts on ~~11-12~~ parcels, as recommended by City staff to better align with the vision of the proposed General Plan 2050. These revisions are shown in Table 3-2, *General Plan Land Use and Zoning Revisions*, and on Figure 3-4, *General Plan Land Use and Zoning Revisions*.

The last paragraph in Section 3.2, *Overview*, on page 3-3 of the Draft EIR is hereby amended as follows:

As part of the proposed project, the City will make amendments to the North Station Area Specific Plan (NSASP), ~~Downtown Station Area Specific Plan (DSASP)~~, Roseland Area/Sebastopol Road Specific Plan (RA/SRSP), and the SRCC to ensure consistency with the proposed General Plan 2050. Concurrent with the proposed General Plan 2050, the City is updating its 2012 Community-wide Climate Action Plan (CCAP) in support of Santa Rosa Forward. The proposed GHG Reduction Strategy is an update to and replacement of the CCAP. It is a strategic planning document that would provide policies and actions that would help the City and the community at large to reduce their GHG emissions and improve community resilience to hazardous conditions associated with climate change. The proposed General Plan 2050, Specific Plan, and

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SRCC amendments, and the proposed GHG Reduction Strategy are discussed in detail in Section 3.7.1, Section 3.7.2, Section 3.7.3, and Section 3.7.4, respectively.

The text in Section 3.7, *Project Components*, on page 3-10 of the Draft EIR is hereby amended as follows:

As required by State law, the proposed project includes multiple components to ensure that each element of the Santa Rosa General Plan is internally (or horizontally) consistent and the NSASP, ~~DSASP, RA/SRSP,~~ the SRCC, and GHG Reduction Strategy are consistent with the General Plan (also known as vertical consistency). The section provides a description of each project components.

The first paragraph in Section 3.7.1.3, *Land Use Designations*, on page 3-12 of the Draft EIR is hereby amended as follows:

The proposed General Plan 2050 land use map shows the land use designations that establish the uses, density ranges, and development intensities allowed on each parcel of land. In general, standards of building intensity for residential uses are stated as the allowable range of dwelling units per gross acre (units/acre). Gross acreage includes the entire site (as opposed to net acreage, which excludes unbuildable areas). Nonresidential uses ~~are described with square footage per employee (sf/employee) or may be stated as maximum floor-area ratios (FAR) based on net acreage.~~ FAR is a ratio of the building square footage permitted on a lot to the net square footage of the lot. For example, on a site with 10,000 square feet of net land area, a FAR of 1.0 will allow 10,000 square feet of building floor area to be built. This could take the form of a two-story building with 50 percent lot coverage, or a one-story building with 100 percent lot coverage. A FAR of 0.4 would allow 4,000 square feet of floor area. The number of residential units permitted and nonresidential FAR are further modified by the zoning district, which, pursuant to California Government Code Section 65860(a), is required to be consistent with the General Plan. The following sections describe the land use designations for the proposed General Plan 2050, which would be carried forward from the existing General Plan 2035. The land use types are residential, mixed use, commercial, office, industrial, and other, which includes public/institutional, parks and recreation, open space, and agriculture. The proposed General Plan 2050 does not introduce any new land use designation types.

The first two bullet points under the “Mixed Use” subheading in Section 3.7.1.3, *Land Use Designations*, on pages 3-13 and 3-14 of the Draft EIR is hereby amended as follows:

- **Transit Village Medium (25-40.0 units/gross acre and 300 sf/employee).** This land use designation is intended to accommodate mixed-use development within approximately one-half mile of a transit facility. Development should transition from less intense uses at the outlying edges to higher intensity uses near the transit facility. Residential uses are required, and ground-floor neighborhood-serving retail and Missing Middle Housing types, including Live/Work uses, are encouraged.
- **Transit Village Mixed Use (40 units/gross acre minimum and 300 sf/employee).** This land use designation is intended to accommodate a well-integrated mix of higher-intensity residential, including Missing Middle Housing, such as Multiplex (small and large), Courtyard buildings, Townhouses, and Live/Work units, office, and commercial uses within one-quarter mile of a transit facility. Development is designed and oriented to create a central node of activity at or near the transit facility. There is no maximum density requirement for this designation.

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The bulleted list under the “Commercial” subheading in Section 3.7.1.3, *Land Use Designations*, on page 3-15 of the Draft EIR is hereby amended as follows:

- **Retail and Business Services (~~300 sf/employee~~)**. This land use designation allows retail and service enterprises, offices, and restaurants. It includes regional centers, which are large complexes of retail and service enterprises anchored by one or more full line department stores, and destination centers, which are retail centers anchored by discount or warehouse stores. Large grocery stores are expressly permitted in Community Shopping Centers and downtown only, and they may be considered through a Conditional Use Permit process on other commercial sites.
- **Community Shopping Center (~~300 sf/employee~~)**. The vision for this land use designation is a complex of retail services and enterprises anchored by a large grocery store and serving a community clientele. Typical uses include restaurants and shops offering convenience goods. These sites are in areas surrounded by residential development and are intended to be walkable areas with a mix of uses that meet the shopping needs for surrounding neighborhoods and provide housing integrated with commercial development. Residential uses shall be incorporated into the overall design but may be provided over time as part of a phased development. Existing community shopping centers are not required to include residential uses for minor alterations or re-occupancy but are required to evaluate and demonstrate through site planning that future residential would not be precluded when significant additions or reconstruction are proposed.
- **Neighborhood Shopping Center (~~300 sf/employee~~)**. This land use designation includes small groups of retail and service enterprises providing shopping and services to satisfy the day-to-day needs of local neighborhoods and workplaces. Typical neighborhood center uses include small grocery stores, restaurants, barber or beauty shops, cleaners, shoe repair, and shops offering convenience goods. Residential development is encouraged but not required. New neighborhood centers are allowed in any land use designation where they can be supported.

The bullet point under the “Office” subheading in Section 3.7.1.3, *Land Use Designations*, on page 3-15 of the Draft EIR is hereby amended as follows:

- **Office (~~250 sf/employee~~)**. This land use designation provides sites for administrative, financial, business, professional, medical, and public offices. There is flexibility in how office space is designed to accommodate changing market conditions.

The bulleted list under the “Industrial” subheading in Section 3.7.1.3, *Land Use Designations*, on pages 3-15 and 3-16 of the Draft EIR is hereby amended as follows:

- **Business Park (~~350 sf/employee~~)**. This land use designation accommodates holistically planned, visually attractive centers for businesses that do not generate nuisances (noise, clutter, noxious emissions, etc.) in campus-like environments for corporate headquarters, research and development facilities, offices, light manufacturing and assembly, industrial processing, general service, incubator facilities, testing, repairing, packaging, and publishing and printing. Warehousing and distribution facilities, retail, hotels, and residential uses are permissible on an ancillary basis. Restaurants and other related services are permitted as accessory uses. Outdoor storage is not permitted.

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- **Light Industry (400 sf/employee).** This land use designation supports light industrial, warehousing, and some heavier commercial uses. Uses appropriate to this land use category include auto repair, bulk or warehoused goods, general warehousing, manufacturing/assembly, home improvement and landscape materials retail, freight or bus terminals, research-oriented industrial, accessory offices, employee-serving commercial uses, and services with large space needs, such as health clubs. Professional office buildings are not permitted.
- **General Industry (400 sf/employee).** This land use designation provides areas for manufacturing and distribution activities with potential for creating nuisances, along with accessory offices and retailing. Unrelated retail and service commercial uses (which can be appropriately located elsewhere in the city) are not permitted. Uses may generate truck traffic and operate 24 hours a day.

The first bullet point under the “Other” subheading in Section 3.7.1.3, *Land Use Designations*, on page 3-16 of the Draft EIR is hereby amended as follows:

- **Public/Institutional (25-40 units/gross acre minimum and 300 sf/employee).** This land use designation allows for governmental or semi-public facilities, such as hospitals, utilities, and government office centers; however, such facilities may also be allowed in areas with other land use designations, provided they comply with applicable zoning code standards.

The text in Section 3.7.2, *Specific Plan Amendments*, on page 3-24 of the Draft EIR is hereby amended as follows:

In September 2012, the City Council adopted the NSASP. The primary objective of NSASP is to support future rail transit by increasing the number of residents and employees within walking distance of the SMART station by improving pedestrian, bicycle, auto, and transit connections, increasing residential density, promoting economic development, and enhancing aesthetics and quality of life. ~~In October 2020, the City Council adopted an updated DSASP. The DSASP was updated with the stated purpose to address land use, transportation and infrastructure needs associated with intensification of housing development in the Downtown.~~ In November 2016, the City Council adopted the RA/SRSP to support a unified, vital, healthy and livable Roseland community. The area’s designation as a Priority Development Area supports walkable, bikeable, and transit-rich neighborhoods by increasing the number and proximity of residents to amenities, schools, parks and jobs. The plan aims to do this by improving connectivity, concentrating areas of activity, and enhancing the physical environment. The proposed project would update the NSASP and ~~DSASP-RA/SRSP~~ to be consistent with the proposed General Plan 2050 by eliminating the references to local streets in the ~~NSASP and DSASP~~ circulation/mobility figures and text of both specific plans.

The text under the “New Zoning District: Missing Middle Housing” subheading in Section 3.7.3.2, *Title 20: Zoning Code*, on page 3-25 of the Draft EIR is hereby amended as follows:

SRCC Title 20, Zoning, would be amended to include a new combining district to accommodate the type of housing referred to as “Missing Middle.” This proposed new combining district provides zones and standards to implement the City’s vision of enabling Missing Middle Housing. Missing Middle Housing refers to ~~housing that provides diverse housing options along the spectrum of affordability, which includes duplexes, triplexes, fourplexes and bungalows. Other examples can include cluster homes and cottage courts~~ house-scale buildings with multiple units in walkable neighborhoods. Missing Middle Housing adds

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what is often referred to as “gentle density” because it adds dwelling units without altering the character of neighborhoods. Buildings are generally not more than two and a half stories in height; have multiple units in one building; have amenities such as porches that contribute to the streetscape; have limited off-street parking, generally at the rear of the structure, reached by a narrow (single-lane) driveway; and have some shared open space, often in the form of a courtyard or rear or side yard. The proposed Missing Middle Housing combining district would be denoted as “-MMH” and ~~could be combined~~ is compatible with any medium-intensity residential or zoning districts (Medium Density Multi-Family Residential, Multi-Family Residential, Transit Village-Mixed), mixed-use primary zoning districts, and some planned development areas, as established by SRCC Section 20-20.020, Zoning Map and Zoning Districts, provided the provisions of the standards of the proposed new combining district are met. The proposed new zoning district identifies Missing Middle Housing zones and allows for a Missing Middle Housing Bonus (MMH Bonus) for potential future housing within these zones. The MMH Bonus would be determined on a case-by-case basis for qualifying projects as determined by the City during the project application and approval process.

Table 3-2, *General Plan Land Use and Zoning Revisions*, on page 3-18 of the Draft EIR is hereby amended as follows:

TABLE 3-2 GENERAL PLAN LAND USE AND ZONING REVISIONS

Map No.	APN	General Plan Land Use Designation		Zoning District		Current Capacity (DU)	Future Capacity (DU)	Net Capacity (DU)
		Existing	Proposed	Existing	Proposed			
1	180-270-050	Low Density Residential	Retail and Business Services	Single-Family Residential (R-1-6)	General Commercial (CG)	1	4	3
2	043-041-034	Low Density Residential	Medium Density Residential	Single-Family Residential (R-1-6)	Medium Density Multi-Family Residential (R-2)	4	4	0
3	035-700-077	Low Density Residential	Retail and Business Services	Planned Development Residential (PD95-001)	General Commercial (CG)	14	11	3
4	037-131-018	Medium Density Residential	Retail and Business Services	General Commercial (CG)	no change	6	6	0
5	037-131-019	Medium Density Residential	Retail and Business Services	General Commercial (CG)	no change	5	5	0
6	182-520-098	Low Density Residential	Medium High Density Residential	Rural Residential (RR-40)	Multi-Family Residential (R-3-10)	2	10	8
7	180 -520-099	Low Density Residential	Medium High Density Residential	Rural Residential (RR-40)	Multi-Family Residential (R-3-10)	3	12	9
8	035-530-044	General Industry	Business Park	General Industrial (IG)	Business Park (BP)	72	72	0

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TABLE 3-2 GENERAL PLAN LAND USE AND ZONING REVISIONS

Map No.	APN	General Plan Land Use Designation		Zoning District		Current Capacity (DU)	Future Capacity (DU)	Net Capacity (DU)
		Existing	Proposed	Existing	Proposed			
9	010-091-001	Neighborhood Mixed Use	Maker Mixed Use	Neighborhood Mixed Use – Historic (NMU-H)	Maker Mixed Use – Historic (MMU-H)	4.0 FAR	4.0 FAR	0
10	125-252-003	Medium Residential	Parks/ Recreation	Single-Family Residential (R-3-18)	Open Space-Recreation – Scenic Road (OSR-SR)	47	0	-47
11	043-122-007	Medium Residential	Parks/ Recreation	Single-Family Residential (R-3-18)	Open Space-Recreation – Scenic Road (OSR-SR)	69	0	-69
12	041-043-056	Public/Institutional	Transit Village Mixed Use	North Station Area Combining District (PI-SA)	Transit Village-Mixed	0	17	17
13	041-043-057	Public/Institutional	Transit Village Mixed Use	North Station Area Combining District (PI-SA)	Transit Village-Mixed	0	42	42
14	010-091-007	Neighborhood Mixed Use	Maker Mixed Use	Neighborhood Mixed Use – Historic (NMU-H)	Maker Mixed Use – Historic (MMU-H)	4.0 FAR	4.0 FAR	0
Total						223	183	-40

Note: APN = Assessor Parcel Number; FAR = Floor Area Ratio
Source: City of Santa Rosa, 2024

Table 3-3, *Proposed Rezoning Sites*, on page 3-20 of the Draft EIR is hereby amended as follows:

TABLE 3-3 PROPOSED REZONING SITES

Map No.	APN	Existing Zoning	Proposed Zoning	Current Capacity (DU)	Future Capacity (DU)	Net Capacity (DU)
1	043-071-022	Single-Family Residential (R-1-6)	Multi-Family Residential (R-3-10)	29	35	6
2	043-191-021	Planned Development Residential (PD 06-001)	Multi-Family Residential (R-3-10)	32	25	-7
3	043-200-006	Planned Development Residential (PD 06-001)	Multi-Family Residential (R-3-10)	27	21	-6
4	043-191-024	Planned Development Residential (PD 06-001)	Multi-Family Residential (R-3-10)	60	47	-13
5	043-200-007	Planned Development Residential (PD 06-001)	Multi-Family Residential (R-3-10)	16	12	-4

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TABLE 3-3 PROPOSED REZONING SITES

Map No.	APN	Existing Zoning	Proposed Zoning	Current Capacity (DU)	Future Capacity (DU)	Net Capacity (DU)
6	043-071-007	Single-Family Residential (R-1-6)	Multi-Family Residential (R-3-10)	66	81	15
7	043-200-010	Planned Development Residential (PD 06-001)	Multi-Family Residential (R-3-10)	171	133	-38
8	043-071-023	Single-Family Residential (R-1-6)	Multi-Family Residential (R-3-10)	4	5	1
9	043-191-019	Planned Development Residential (PD 06-001)	Multi-Family Residential (R-3-10)	73	57	-16
10	043-200-009	Planned Development Residential (PD 06-001)	Multi-Family Residential (R-3-10)	44	35	-9
11	181-190-004	Planned Development Residential (PD 98-003)	General Commercial (CG)	0	88	88
12	181-190-008	Planned Development Residential (PD 98-003)	General Commercial (CG)	0	16	16
13	181-190-009	Planned Development Residential (PD 98-003)	General Commercial (CG)	0	76	76
14	181-190-006	Planned Development Residential (PD 98-003)	General Commercial (CG)	0	7	7
Total				522	638	116

Source: City of Santa Rosa, 2024.

The text on page 3-20 following Tables 3-2 and 3-2 of the Draft EIR is hereby amended as follows:

As shown in Table 3-2 and Table 3-3, the proposed revisions to the land use designations and, as required, zoning districts on the 13 parcels listed in Table 3-2 would result in a net loss for the of potential future development of 40 residential units, and the. However, the proposed revisions to the zoning districts on 14 parcels listed in Table 3-3 would result in a net gain of 116 potential future development of residential units on a scale greater than the net loss from the 13 parcels shown in Table 3-2. Therefore, with these changes, there would not be a loss in housing potential but rather would result in a net gain for the of potential future development of 76 residential units.

CHAPTER 4.0, ENVIRONMENTAL ANALYSIS

The third paragraph under the “General Plan 2050 Goals, Policies, and Actions” subheading on page 4-5 of the Draft EIR is hereby amended as follows:

Public Resources Code (PRC) Section 21081.6(b) and CEQA Guidelines Section 15126.4(a)(2) establish that when a project examined in an EIR is a plan (such as a General Plan), policy, regulation, or other public project, mitigation measures may be incorporated into the plan, policy, regulation, or project design. Therefore, as this is a General Plan EIR, some policies and actions in the proposed General Plan are also

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required as means to mitigate environmental impacts under CEQA. These policies and actions are fully enforceable at the discretion of the decision-maker regarding applicability to a proposed future development and use the imperative “shall,” and in all such cases are mandatory. The mitigating policies and actions described in the EIR that are fully enforceable through permit conditions, agreements, or other legally binding instruments and include performance criteria are marked with an asterisk (*). These proposed General Plan policies and actions are listed in the impact discussions of Chapters 4.1 through 4.18 of this Draft EIR to illustrate where the proposed policies and actions would reduce impacts from future development in Santa Rosa.

The text under the “Associated Specific Plan and Code Amendments” subheading on page 4-5 of the Draft EIR is hereby amended as follows:

As required by State law, the proposed project includes multiple components to ensure that each element of the Santa Rosa General Plan is internally (or horizontally) consistent³ and the North Station Area Specific Plan (NSASP), ~~Downtown Station Area Specific Plan (DSASP)~~, Roseland Area/Sebastopol Road Specific Plan (RA/SRSP), the Santa Rosa City Code (SRCC), and GHG Reduction Strategy are consistent with the General Plan (also known as vertical consistency). The impacts from the proposed amendments to the NSASP, ~~DSASP~~, RA/SRSP, and SRCC are therefore analyzed concurrently with the impacts of the proposed General Plan 2050.

CHAPTER 4.1, AESTHETICS

The fifth indented bullet under fourth bullet under the “Santa Rosa City Code” subheading in Section 4.1.1.1, *Regulatory Framework*, on page 4.1-4 of the Draft EIR is hereby amended as follows:

- **Chapter 20-38, *Signs*.** This chapter of the Zoning Code establishes regulations intended to appropriately limit the placement, type, size, and number of signs allowed within the City, and to require the proper maintenance of signs to, among others, preserve and enhance the aesthetic quality of the entire community. Section 20-38.030, *Sign Permit requirements*, requires a Sign permit prior to the installation, construction, or alteration of any sign. The review authority is required to find that the proposed sign is consistent with the Zoning Code standards, visually complementary and compatible with the scale, architectural style, and prominent natural features of its surroundings prior to approval of a Sign Permit. Section 20-38.050, *General requirements for all signs*, outlines the sign area measurement, height measurement, and locations requirements. Section 20-38.080, *Standards for Wayfinding Signs*, provides standards for public/civic wayfinding and business wayfinding, and allows for the implementation of wayfinding signage within the boundaries of both the North Santa Rosa Station Area Specific Plan and the Downtown Station Area Specific Plan.

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CHAPTER 4.3, AIR QUALITY

The following actions in the bulleted list of proposed goals, policies, and actions related to air quality under Section 4.3.2.3, *Impacts of the Environment on a Project*, on pages 4.3-36 through 4.3-38 of the Draft EIR are hereby amended as follows:

- **Action 2-1.2:** Work with developers to ensure new and redevelopment respects align with the integrity and character of surrounding uses, especially when nonresidential uses are proposed adjacent to residential areas. Consider use of appropriate buffers, landscaping, and other types of screening to minimize noise, light, glare, and odor.
- **Action 2-5.6:** Maintain and expand industrial zoned land close to established transportation corridors, including Highway 101, State Route 12, and the SMART rail line, and focusing on areas away from minimizing impacts of growth on sensitive receptors.
- **Action 2-9.4:** Require industrial developments adjacent to residential areas to provide appropriate mitigation such as buffers, and institute setbacks, landscaping, and screening requirements intended to minimize noise, light, glare, and other impacts.
- **Goal 6-1:** Improve health and well-being for all community members by emphasizing community health in ~~all~~ City policies, programs, actions, and activities.
 - ***Action 6-1.5:** As recommended by the California Air Resources Board, the City shall require projects that would result in construction activities within 1,000 feet of residential and other land uses that are sensitive to toxic air contaminants (e.g., hospitals, nursing homes, day care centers), as measured from the property line of the project, to prepare a construction health risk assessment in accordance with policies and procedures of the Office of Environmental Health Hazard Assessment and the Bay Area Air Quality Management District (BAAQMD Air District) California Environmental Quality Act (CEQA) Guidelines that identifies mitigation measures and appropriate enforcement mechanisms capable of reducing potential cancer and non-cancer risks below the BAAQMD Air District threshold.
 - ***Action 6-1.6:** The City shall ~~Require~~ an operational health risk assessment for new industrial or warehousing development projects that 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and 2) are within 1,000 feet of a sensitive land use or Overburdened Community, as defined by BAAQMD the Air District. The operational HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and BAAQMD the Air District. If the operational HRA shows that the incremental cancer risk exceeds 10 in a million, the noncancer hazard index of 1.0, or the thresholds as determined by BAAQMD the Air District, require the project applicant to identify and demonstrate measures, ~~such as those listed in the General Plan Environmental Impact Report,~~ that can reduce potential cancer and noncancer risks to acceptable levels.

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The following policy and actions in the row for Natural and Working Lands Control Measures in Table 4.3-8, *Control Measures from the BAAQMD Bay Area Air District 2017 Clean Air Plan*, on pages 4.3-45 through 4.3-48 of the Draft EIR are hereby amended as follows:

- **Policy 3-5.3:** Conserve and protect creeks, wetlands, vernal pools, wildlife ecosystems, rare plant habitats, and waterways ~~from development~~.
- ***Action 3-5.10:** ~~The City shall continue to require the implementation of~~ existing regulations and procedures, including subdivision guidelines, zoning, design review, and environmental law, ~~to conserve prior to, during, and after project approval and construction for projects that may affect~~ wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species to ensure their conservation. Existing regulations and procedures include, but are not limited to, Federal and California Endangered Species Act; CDFW 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities; Santa Rosa Plain Conservation Strategy; United States Fish and Wildlife (USFWS) Service Programmatic Biological Opinion; CDFW 2012 Staff Report on Burrowing Owl Mitigation; 2012 USFWS Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls; 2020 Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California; Fish and Game Code Section 1600 et seq; Clean Water Act; and Porter Cologne Water Quality Control Act, as subsequently revised, supplemented, or replaced.
- ***Action 3-5.11:** ~~The City shall require~~ a qualified biologist to prepare a biological resource assessment (BRA) ~~as part of project approval~~ for proposed development on sites that may support or have the potential to affect special-status species, sensitive natural communities, important wildlife corridors, or regulated wetlands and waters to identify potential impacts and measures for protecting the resource and surrounding habitat prior to, during, and after project construction. The BRA shall be prepared to address conformance with all applicable federal, State, and local regulations and protocols, including, but not limited to, those listed in Action 3-5.10, as subsequently revised, supplemented, or replaced.

The following actions in the bulleted list of proposed goals, policies, and actions related to air quality under the “Construction” subheading of Impact Discussion AIR-2 in Section 4.3.3, *Impact Discussion*, on pages 4.3-55 and 4.3-56 of the Draft EIR are hereby amended as follows:

- ***Action 3-6.31:** ~~The City shall require~~ projects that exceed the Bay Area Air Quality Management District (BAAQMD) ~~Air District~~ screening sizes to evaluate project-specific operation and construction emissions in conformance with the ~~BAAQMD Air District~~ methodology and if operation or construction-related criteria air pollutants exceed the ~~BAAQMD Air District~~ thresholds of significance, require the project applicant to mitigate the impacts to an acceptable level, consistent with the BAAQMD Air District Guidelines, as subsequently revised, supplemented, or replaced.
- ***Action 3-6.32:** ~~The City shall continue to implement the Bay Area Air Quality Management District (BAAQMD) Air District Basic Control Measures included in the latest version of BAAQMD Air District’s California Environmental Quality Act (CEQA) Air Quality Guidelines, as~~

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subsequently revised, supplemented, or replaced, to control fugitive dust (i.e., particulate matter PM_{2.5} and PM₁₀) during demolition, ground-disturbing activities, and/or construction.

The sixth paragraph of the significance discussion for Impact Statement AIR-2b in Section 4.3.3, *Impact Discussion*, on page 4.3-63 of the Draft EIR is hereby amended as follows:

Ozone concentrations depend on a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash,⁴⁹ atmospheric stability, and wind patterns. Secondary formation of particulate matter and ozone can occur far from sources as a result of regional transport due to wind and topography (e.g., low-level jet stream). Photochemical modeling depends on all emission sources in the entire domain (i.e., modeling grid). Low resolution and spatial averaging produce “noise” and modeling errors that usually exceed individual source contributions. Because of the complexities of predicting ground-level ozone concentrations in relation to the National and California AAQS, it is not possible to link health risks to the magnitude of emissions exceeding the significance thresholds.

Footnote 5: The downwash effect is a wind-related phenomenon commonly observed in urban environments, especially around tall buildings and skyscrapers. This effect occurs when wind strikes the face of these high structures and is deflected downwards, creating strong downdrafts at the street level. These downdrafts can significantly increase wind speeds on the ground, leading to uncomfortable and sometimes hazardous conditions for pedestrians. (Building Downwash: How to Mitigate Urban Wind Discomfort | Blog)

CHAPTER 4.4, BIOLOGICAL RESOURCES

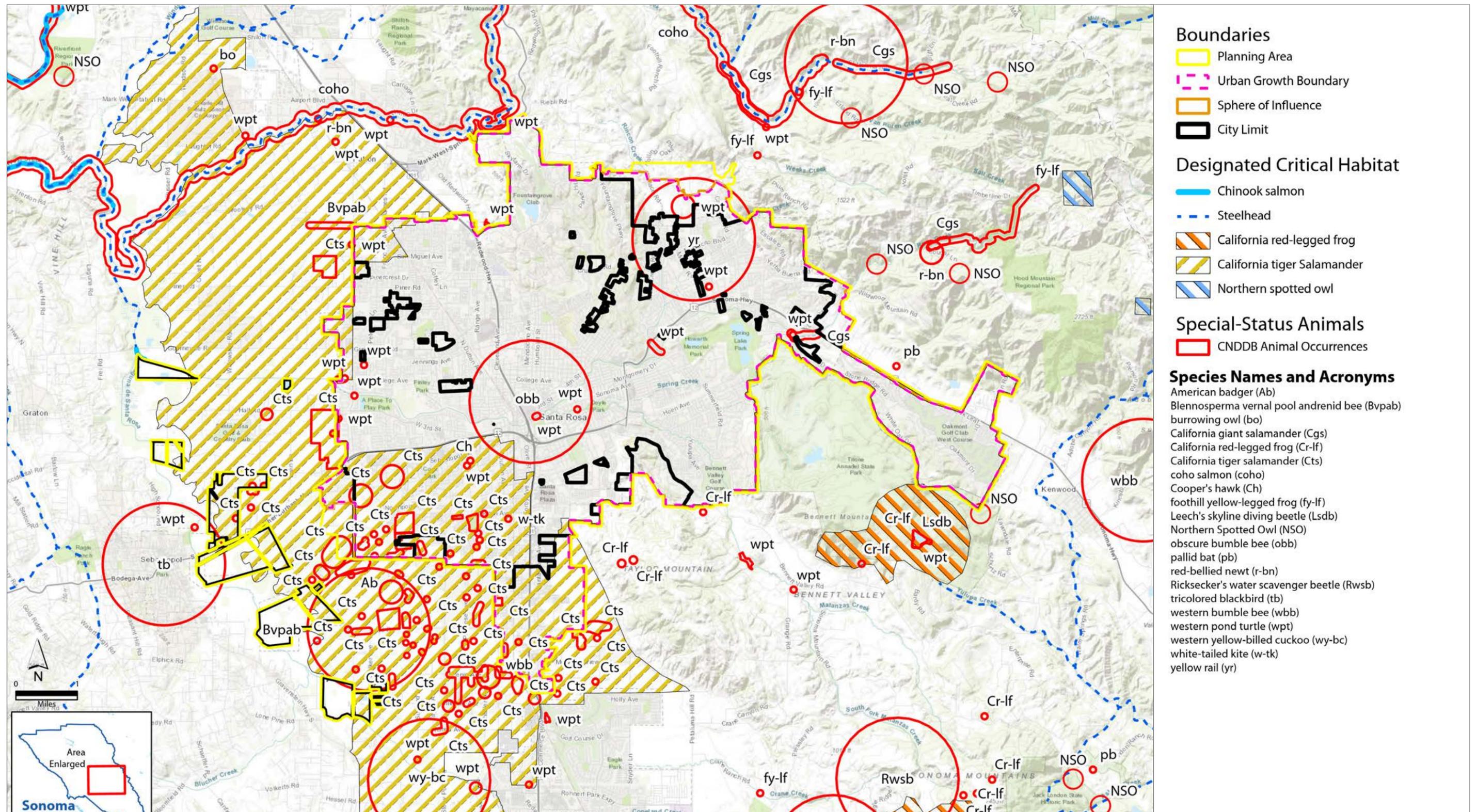
Figure 4.4-3, *Special-Status Animals and Critical Habitats*, on page 4.4-29 of the Draft EIR is hereby amended as shown on the following page.

The row for the burrowing owl (*Athene cunicularia*) under the “Birds” subheading in Table 4.4-3, *Special-Status Animal Species in the EIR Study Area*, on page 4.4-33 of the Draft EIR is hereby amended as follows:

TABLE 4.4-3 SPECIAL-STATUS ANIMAL SPECIES IN THE EIR STUDY AREA

Scientific Name	Common Name	Federal List	California List	CDFW	General Habitat	Potential for Occurrence in EIR Study Area
Birds						
<i>Athene cunicularia</i>	Burrowing owl	None	None <u>Candidate</u>	Species of Special Concern	Open, dry grasslands that contain abundant ground squirrel burrows	Moderate. Observed in Sonoma County where suitable habitat is present, with CNDDDB records to the south of EIR Study Area.

BIOLOGICAL RESOURCES



Source: California Natural Diversity Database release date 4/1/2023 accessed on 4/6/2023; USFWS critical habitat data release date 3/23/2023 accessed on 4/6/2023; Basemap by: ESRI. Map produced by www.digitalmappingsolutions.com 8/5/2024.



Figure 4.4-3
Special-Status Animals and Critical Habitats

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The following policy and actions in the bulleted list of proposed goals, policies, and actions related to biological resources under Impact Discussion BIO-1 in Section 4.4.3, *Impact Discussion*, on pages 4.4-42 and 4.4.43 of the Draft EIR are hereby amended as follows:

- **Policy 3-5.3:** Conserve and protect creeks, wetlands, vernal pools, wildlife ecosystems, rare plant habitats, and waterways ~~from development~~.
- ***Action 3-5.7:** ~~The City shall~~ continue to consult with the California Department of Fish and Wildlife (CDFW) to identify significant environments and priorities for acquisition or maintenance of open space areas based on biological and environmental concerns and develop a strategy for maintaining areas that will preserve the protected and sensitive populations of plants and animals currently found in the UGB. Strategies shall be based on federal, State, and local regulations relevant to the protection of the identified species, including, but not limited to, Federal or California Endangered Species Act, Santa Rosa Plain Conservation Strategy, and United States Fish and Wildlife Service Programmatic Biological Opinion, as subsequently revised, supplemented, or replaced.
- ***Action 3-5.10:** ~~The City shall~~ continue to require the implementation of existing regulations and procedures, including subdivision guidelines, zoning, design review, and environmental law, to conserve prior to, during, and after project approval and construction for projects that may affect wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species to ensure their conservation. Existing regulations and procedures include, but are not limited to, Federal and California Endangered Species Act; CDFW 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities; Santa Rosa Plain Conservation Strategy; United States Fish and Wildlife (USFWS) Service Programmatic Biological Opinion; CDFW 2012 Staff Report on Burrowing Owl Mitigation; 2012 USFWS Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls; 2020 Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California; Fish and Game Code Section 1600 et seq; Clean Water Act; and Porter Cologne Water Quality Control Act, as subsequently revised, supplemented, or replaced.
- ***Action 3-5.11:** ~~The City shall~~ Require a qualified biologist to prepare a biological resource assessment (BRA) as part of project approval for proposed development on sites that may support or have the potential to affect special-status species, sensitive natural communities, important wildlife corridors, or regulated wetlands and waters to identify potential impacts and measures for protecting the resource and surrounding habitat prior to, during, and after project construction. The BRA shall be prepared to address conformance with all applicable federal, State, and local regulations and protocols, including, but not limited to, those listed in Action 3-5.10, as subsequently revised, supplemented, or replaced.
- ***Action 3-5.12:** ~~The City shall~~ Require that construction or other ground-disturbing activities that may affect bird nests or nesting habitat avoid nests of native birds when the nest is in active use by implementing protection measures specified by a qualified ornithologist or biologist to ensure compliance with the California Fish and Game Code and federal Migratory Bird Treaty Act. Compliance guidelines are detailed in the General Plan Environmental Impact

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~~Report. If demolition, construction, ground-disturbing, or tree removal/pruning activities occur during the nesting season (February 1 and August 31), preconstruction surveys shall be conducted by a qualified ornithologist or biologist and approved by the City prior to issuance of building permits. Preconstruction surveys are not required for construction, ground-disturbing, or tree removal/pruning activities outside the nesting season.~~

- ~~*Action 3-5.13: The City shall develop and adopt a bird-safe design ordinance in consultation with a qualified biologist and require projects to demonstrate compliance with the ordinance prior to project approval. The ordinance shall apply to all new development and redevelopment projects and include the latest bird-safe design guidelines and best management practice strategies, such as those from the National Audubon Society, to provide specific criteria and refined guidelines as part of design review and/or project approval process of new buildings and taller structures to protect birds from injury and mortality from collisions with buildings, towers, and other human-made structures. Preserve and restore wildlife habitats and corridors. Continue to provide some protection for habitat areas in the city, such as for the rookery on West 9th Street. Prior to adoption of the bird-safe design ordinance, project applicants shall show compliance with bird-safe design requirements, consistent with best practices.~~

The significance discussion for Impact Statement BIO-1 in Section 4.4.3, *Impact Discussion*, on pages 4.4-43 and 4.4-44 of the Draft EIR is hereby amended as follows:

Impact BIO-1: Impacts to special-status species or the inadvertent loss of bird nests in active use, which would conflict with the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), could occur as a result of implementation of the proposed project.

Significance with Mitigation: Less than significant. Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*, of the proposed General Plan 2050 contains goals, policies, and actions that require local planning and development decisions to consider impacts to biological resources, including special-status species and active bird nests, on a project-by-project basis. Proposed General Plan 2050 *Action 3-5.7 requires the City to continue to consult with CDFW to identify significant environments and develop a strategy for maintaining areas that will preserve special-status species; *Action 3-5.10 requires the City to continue to require the implementation of existing regulations to conserve habitat for special-status species; and *Action 3-5.11 requires the City to have biological resource assessments prepared that identify potential impacts and mitigation measures for protecting the resources for proposed development on sites that may support or have the potential to affect special-status species. In addition, proposed *Action 3-5.12 and *Action 3-5.13 require the protection of bird habitat, including the possible loss or disturbance to bird nests in active use, which conflicts with both the MBTA and CFGC. Pursuant to *Action 3-5.12, nesting bird protection measures for new development sites where nesting birds may be present, include but are not limited to, initiating vegetation clearing and construction outside the bird nesting season (February 1 through August 31) or conducting preconstruction surveys by a qualified ornithologists or biologists in advance of any disturbance. If active nests are encountered, appropriate buffer zones may be established based on recommendations by the qualified ornithologist or biologist and remain in place until any young birds have successfully left the nest. Monitoring by the qualified ornithologist

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or biologist may also be required based on recommendations by the qualified ornithologist or biologist. Preconstruction surveys are not required for tree removal or construction activities outside the nesting period. Pursuant to *Action 3-5.13, bird-safe guidelines provide specific criteria to protect birds from injury and mortality from collisions with buildings, towers, and other human-made structures (see Impact Discussion BIO-3 for additional details on bird-safe guidelines for development projects). Implementation of the proposed General Plan 2050 goal, policies, and actions listed above, in conjunction with adherence to State and federal regulations related to the protection of special-status species, including the *Santa Rosa Plain Conservation Strategy*, as subsequently revised, supplemented, or replaced, where applicable, would address potential impacts of anticipated future development under the proposed project. Future development would continue to be reviewed through the City's entitlement process and CEQA, when applicable, to ensure consistency with local, State, and federal regulations and all General Plan policies and actions intended to protect sensitive biological resources. Ultimately, potential future development in Santa Rosa over the buildout horizon of the proposed General Plan 2050 would be performed in accordance with the proposed General Plan 2050 goal, policies, and actions discussed above, which would ensure that potential impacts on special-status species would be *less than significant*.

The following policy and actions in the bulleted list of proposed goals, policies, and actions related to biological resources under Impact Discussion BIO-2 in Section 4.4.3, *Impact Discussion*, on pages 4.4-45 and 4.4-46 of the Draft EIR are hereby amended as follows:

- **Policy 3-5.3:** Conserve and protect creeks, wetlands, vernal pools, wildlife ecosystems, rare plant habitats, and waterways ~~from development~~.
- ***Action 3-5.19:** ~~The City shall R~~require new development along ~~channelized~~ waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for ~~shared use paths and recreation~~ multiuse trails and recreation, consistent with the Santa Rosa Citywide Creek Master Plan and concept plans that have been developed for specific reaches of the creek network, as subsequently revised, supplemented, or replaced.
- ***Action 3-5.20:** ~~The City shall R~~require new development to maintain an adequate setback from ~~channelized~~ waterways to recognize the 100-year flood elevation, with setbacks in the Creekside Development Standards in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans, as subsequently revised, supplemented, or replaced, to meet restoration and enhancement goals.

The significance discussion for Impact Statement BIO-2 in Section 4.4.3, *Impact Discussion*, on page 4.4-46 of the Draft EIR is hereby amended as follows:

Impact BIO-2: Impacts to riparian areas, drainages, and sensitive natural communities could occur from potential future development under the proposed General Plan 2050 where natural habitat remains.

Significance with Mitigation: Less than significant. Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*, of the proposed General Plan 2050 contains goals, policies, and actions that require local planning and development decisions to consider impacts to biological

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resources, including riparian areas, drainages, and sensitive natural communities, on a project-by-project basis. Proposed *Action 3-5.19 requires that new development along ~~channelized~~ waterways establish an ecological buffer zone between the waterway and development and *Action 3-5.20 requires new development to maintain an adequate setback from ~~channelized~~ waterways to recognize the 100-year flood elevation, with setbacks in the Creekside Development Standards in the zZoning eCode as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans, as subsequently revised, supplemented, or replaced, to meet restoration and enhancement goals. Also, as described under impact discussion BIO-1, proposed *Action 3-5.7, *Action 3-5.10, and *Action 3-5.11 require agency consultation, implementation of existing regulations, and preparation of technical reports that identify and mitigate project-specific impacts. Implementation of the proposed General Plan 2050 goals, policies, and actions listed above would serve to ensure that occurrences of sensitive natural communities are identified, avoided, or adequately mitigated. Future development would continue to be reviewed through the City's entitlement process and CEQA to ensure consistency with local, State, and federal regulations and all General Plan policies and actions intended to protect sensitive biological resources, including sensitive natural communities. Potential future development over the buildout horizon of the proposed General Plan 2050 would be performed in accordance with the proposed General Plan 2050 policies and actions discussed above, which would ensure that potential impacts on sensitive natural communities would be *less than significant*.

The text under Impact Discussion BIO-6 in Section 4.4.3, *Impact Discussion*, on pages 4.4-50 and 4.4-51 of the Draft EIR is hereby amended as follows:

The EIR Study Area is not in any local, regional, or State HCP areas. Therefore, the proposed General Plan 2050 would not conflict with the conservation strategy in any HCP or Natural Community Conservation Plan. Furthermore, several goals, policies, and actions in the proposed General Plan 2050, listed under impact discussions BIO-1, BIO-2, and BIO-4 along with SRCC regulations, would serve to protect and enhance the sensitive natural communities and special-status species within the EIR Study Area. Implementation of the proposed General Plan 2050 goals, policies, and actions, in conjunction with adherence to State and federal regulations related to the protection of special-status species and sensitive natural communities, including the SRPCS, as subsequently revised, supplemented, or replaced, where applicable, would address potential impacts of anticipated future development under the proposed Project. Future development would continue to be reviewed through the City's entitlement process and CEQA to ensure consistency with local, State, and federal regulations and all General Plan policies and actions intended to protect sensitive biological resources. As part of the permitting project with the USACE, projects affecting federally regulated waters must demonstrate that they would not have an adverse effect on federally listed species or would be required to provide adequate compensatory mitigation where avoidance is infeasible. Projects within the boundaries of the SRPCS, including western and southern Santa Rosa, must comply with the rigorous conditions of the Biological Opinion issued by the USFWS in addressing potential effects on CTS, Burke's goldfields, Sebastopol meadowfoam, and Sonoma sunshine. Therefore, *no impact* would occur.

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CHAPTER 4.5, CULTURAL RESOURCES

The text under the “Ethnographic Setting” subheading in Section 4.5.1.3, *Existing Conditions*, on pages 4.5-7 and 4.5-8 of the Draft EIR is hereby amended as follows:

Linguists and ethnographers tracing the evolution of languages have found that most of the indigenous languages of the California region belong to one of five widespread North American language groups (the Hokan and Penutian phyla, and the Uto-Aztecan, Algic, and Athabaskan language families). The distribution and internal diversity of four of these groups suggest that their original centers of dispersal were outside, or peripheral to, the core territory of California, that is, the Central Valley, the Sierra Nevada, the Coast Range from Cape Mendocino to Point Conception, and the Southern California coast and islands. Only languages of the Hokan phylum can plausibly be traced back to populations inhabiting parts of this core region during the Archaic period, and there are hints of connections between certain branches of Hokan, such as that between Salinan and Seri, that suggest that at least some of the Hokan languages could have been brought into California by later immigrants, primarily from the Southwest and northwestern Mexico.⁴

At the time of Euroamerican settlement, people inhabiting this area spoke Southern Pomo, one of seven mutually unintelligible Pomoan languages belonging to the Hokan language stock. The Southern Pomo’s aboriginal territory falls within present day Sonoma County. To the north, it reaches the divide between Rock Pile Creek and the Gualala River, and to the south it extends to near the town of Cotati. The eastern boundary primarily runs along the western flanks of Sonoma Mountain until it reaches Healdsburg, where it crosses to the west side of the Russian River. Within the larger area that constitutes the Southern Pomo homelands, some bands or tribelets occupied distinct areas.

The Bitagomtara were a triblet of the Southern Pomo and they occupied the lands south of Mark West Creek, north of Cotati and the boundary of the Coast Miwok, east of the Laguna de Santa Rosa, and west of Sonoma Canyon.^{5, 6} Primary village sites of the Southern Pomo were occupied continually, while temporary sites were visited to procure resources that were especially abundant or available only during certain seasons. Sites often were situated near freshwater sources and in ecotones where plant life and animal life were diverse and abundant.

Primary village sites of the Southern Pomo were occupied continually, while temporary sites were visited to procure resources that were especially abundant or available only during certain seasons. Sites often were situated near freshwater sources and in ecotones where plant life and animal life were diverse and abundant. There are several ethnographic villages in the EIR Study Area.⁷

The Southern Pomo population was decimated early in the historic period, especially in the southern part of their territory. Ethnic identity was severely impacted in the region of Santa Rosa and Sebastopol; McLendon and Oswalt reported that the few Southern Pomo speakers remaining in 1976 were from north of Healdsburg.⁸ In 1992, the Southern Pomo and Coast Miwok established the Federated Indians of Graton Rancheria and were federally recognized in 2000. The Federated Indians of Graton Rancheria is a federally recognized tribe of Southern Pomo and Coast Miwok people, whose ancestral homelands include the City of Santa Rosa.

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Footnote 4: V. Golla, 2011, *California Indian Languages*, Berkeley and Los Angeles: University of California Press.

Footnote 5: R. Milliken, 1995, *A Time of Little Choice: The Disintegration of Tribal Culture in the San Francisco Bay Area, 1769-1810*, Menlo Park, CA: Ballena Press.

Footnote 6: O. Stewart, 1943, "Notes on Pomo Ethnogeography", *University of California Publications in American Archaeology and Ethnology* 40, no. 2, pp.29–62.

Footnote 7: S. Barrett, 1908, *The Ethno-Geography of the Pomo and Neighboring Indians*, University of California Publications in American Archaeology and Ethnology, vol. 6, no. 1, Berkeley, California: University of California Press.

Footnote 8: S. McLendon and R. Oswalt, 1978, "Pomo," In *California*, edited by R. Heizer, pp. 274–288, *Handbook of North American Indians*, Vol. 8, W. Sturtevant, general editor, Washington, D.C.: Smithsonian Institution.

The text under the "Native American Resources" subheading in Section 4.5.1.3, *Existing Conditions*, on page 4.5-12 of the Draft EIR is hereby amended as follows:

Santa Rosa was a site of Native American habitation beginning approximately 7,000 years ago, and Santa Rosa contains approximately 190 recorded Native American resources.¹² The Santa Rosa Basin, encompassing the EIR Study Area, contains six major drainages: Santa Rosa, Matanzas, Piner, Rincon, Austin, and Brush Creeks. These creeks may hold prehistoric resources because Native American archaeological sites tend to be near waterways as well as along ridge tops, mid-slope terraces, alluvial flats, the base of hills, and near vegetation ecotones.¹³ Trione-Annadel State Park, in the southeast corner of the EIR Study Area, was an important obsidian source for Native American tools. Resources may include chert or obsidian flakes, projectile points, mortars, pestles, dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials.

Footnote 12: Based on a ~~2001~~2023 review of records and literature on file with the California Historical Resources Information System.

Footnote 13: Vegetation ecotones are transition areas between different plant communities.

The following actions in the bulleted list of proposed goals, policies, and actions related to cultural resources under Impact Discussion CUL-1 in Section 4.5.3, *Impact Discussion*, on pages 4.5-15 through 4.5-17 of the Draft EIR are hereby amended as follows:

- ***Action 4-3.2:** For projects with known or the potential to have historic structures, the City shall require the project to follow the Secretary of the Interior Standards for Preservation, Rehabilitation, Restoration, and Reconstruction for the treatment of historic properties and the California Historic Building Code, as subsequently revised, supplemented, or replaced.
- ***Action 4-3.6:** Identify and minimize or remove obstacles for owners of historic properties to support preservation, including guides for repurposing facilities.

Identify resources to:

- Keep cultural surveys relevant.
- Periodically update the City's Cultural Heritage Survey to ensure consistency with current guidelines and best practices, to reflect potential changes in status, and to include properties that have become age-eligible for listing.
- Conduct cultural and/or historic inventories or surveys of areas of the city that have not been surveyed.

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- Install plaques and/or educational signage, in consultation with the Historical Society of Santa Rosa and tribes, at locations of cultural significance and significant events.
- Implement recommendations in the City's Cultural Heritage studies.
- Partner with the local tourism industry, property owners, businesses, nonprofit organizations, and other public agencies to develop and promote Heritage Tourism opportunities, integrating efforts with ongoing initiatives for economic development and the creative economy.
- Work with local schools, ~~and~~ historic organizations, and local tribes to engage and interest residents of all ages in Santa Rosa's prehistory, history, and ~~historic~~ sites, structures, and neighborhoods, and tribal cultural resources.
- ***Action 4-3.7:** Identify buildings that should be recognized for cultural significance and/or considered for landmark designation.
- ***Action 4-3.9:** Preserve historic aspects of parks while integrating modern uses and amenities.
- **Action 4-3.10:** Ensure that non-confidential historic surveys are available on a dedicated City webpage, easily accessible and promoted online.

The significance discussion for Impact Statement CUL-1 in Section 4.5.3, *Impact Discussion*, on pages 4.5-17 and 4.5-18 of the Draft EIR is hereby amended as follows:

Impact CUL-1: Impacts to known or yet to be classified historic buildings or structures could occur from potential future development under the proposed General Plan 2050.

Significance with Mitigation: Less than significant. Implementation of the Santa Rosa City Code (SRCC), Design Guidelines, and the proposed General Plan 2050 goals, policies, and actions, would ensure that new development and exterior remodels are compatible with cultural and historic resources; that landmarks and historic treasures would be preserved, enhanced, and rehabilitated, and that cultural and historic resources of Santa Rosa would be protected and restored. Specifically, proposed General Plan 2050 *Action 4-3.2 would mitigate potential impacts by requiring the City to require projects follow the Secretary of the Interior's Standards for Preservation, Rehabilitation, Restoration, and Reconstruction of historic structures in Santa Rosa and the California Historic Building Code, as subsequently revised, supplemented, or replaced, and *Action 4-3.6 would require the City to work with the owners of historic properties to promote preservation, renovation and rehabilitation of historic structures. Under proposed *Action 4-3.6, *Action 4-3.7, and *Action 4-3.9, the City would require cultural and/or historic inventories or surveys of the city and the identification of buildings and park properties that should be recognized for their cultural significance to further preserve qualifying historic properties in Santa Rosa. Accordingly, implementation of the proposed General Plan 2050 would require the preservation of historic resources and require new development to analyze and avoid any potential impacts to designated historic resources through record searches, preconstruction field surveys, ground-disturbance monitoring, and implementation of appropriate measures or project alternatives to avoid identified significant impacts. Finally, CEQA would require that future potential projects in the EIR Study Area with the potential to significantly impact historical resources be subject to project-level CEQA review wherein the future potential project's potential to

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affect the significance of a surrounding historical resource would be evaluated and mitigated to the extent feasible. The requirement for subsequent CEQA review, pursuant to State law, would minimize the potential for new development to indirectly affect the significance of existing historical resources to the maximum extent practicable.

Potential impacts from future development on historical resources could lead to (1) demolition, which by definition results in the material impairment of a resource's ability to convey its significance; (2) inappropriate modification, which may use incompatible materials, designs, or construction techniques in a manner that alters character-defining features; and (3) inappropriate new construction, which could introduce incompatible new buildings that clash with an established architectural context. While any of these scenarios, especially demolition and alteration, have the potential to change the historic fabric or setting of an architectural resource such that the resource's ability to convey its significance may be materially impaired, compliance with federal and State laws as described in Section 4.5.1.2, *Regulatory Framework*, SRCC, and the proposed General Plan 2050 goals, policies, and actions identified would ensure future development would not be detrimental or injurious to property or improvements in the vicinity and impacts would be *less than significant*.

The following text is hereby added to the first paragraph under Impact Discussion CUL-2 in Section 4.5.3, *Impact Discussion*, on page 4.5-18 of the Draft EIR:

Historical and pre-contact archaeological deposits that meet the definition of archaeological resources under CEQA could be damaged or destroyed by ground-disturbing activities associated with potential future development in Santa Rosa. A substantial adverse change in the significance of an archaeological resource would occur from its demolition, destruction, relocation, or alteration such that the significance of the resource would be materially impaired per CEQA Guidelines Section 15064.5(b)(1). Should this occur, the ability of the deposits to convey their significance, either through containing information important in prehistory or history, or through possessing traditional or cultural significance to Native American or other descendant communities, would be materially impaired. CEQA Guidelines Section 15064.5(c) sets forth the procedures to follow should an archaeological resource be discovered including first identifying if the resource is either a historical archeological resource or a unique archaeological resource. If the City determines that the archaeological site is an historical resource, the City shall refer to the provisions of CEQA Section 21084.1 and CEQA Guidelines Section 15126.4. If the City determines that the site meets the definition of a unique archaeological resource pursuant to CEQA Section 21083.2, the site shall be treated in accordance with the provisions of Section 21083.2. If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.

The following text is hereby added after the third paragraph under Impact Discussion CUL-2 in Section 4.5.3, *Impact Discussion*, on page 4.5-18 of the Draft EIR:

The application of protocols and best management practices to achieve compliance with the National Historic Preservation Act, Native American Historic Resource Protection Act, National Environmental Policy Act, CEQA, and/or applicable Santa Rosa planning guidelines, policies, and procedures to protect the archaeological deposits, both tribal and nontribal include, but are not limited to:

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- All developers in the study area shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement.
- Prior to construction, the project applicant may retain the services of a qualified archaeological monitor and Native American monitor to provide Cultural Awareness Training for all supervisors, contractors, and equipment operators in order to familiarize them with the types of artifacts that could be encountered and the procedures to follow if subsurface cultural resources are unearthed during construction.
- Prior to construction, the project applicant may retain the services of a qualified archaeological monitor and Native American monitor to observe all project-related ground disturbing activities within limits of the ground-disturbing footprint of the proposed project.
- During construction, if any prehistoric or historic subsurface cultural resources are discovered during ground-disturbing activities, all work within 50 feet of the resources shall be halted and a qualified archaeologist shall be consulted to assess the significance of the find according to CEQA Guidelines Section 15064.5 and determine whether the resource requires further study.
- If any find is determined to be significant and a nontribal resource, representatives from the City and the qualified archaeologist shall meet to determine the appropriate and feasible avoidance, testing, preservation or other measures, in light of factors such as the significance of the find, proposed project design, costs, and other considerations.
- If any find is determined to be significant and a tribal resource, representatives from the City and the qualified archaeologist shall consult with the appropriate tribe to evaluate the significance of the resource and to recommend appropriate and feasible avoidance, testing, preservation or mitigation measures, in light of factors such as the significance of the find, proposed project design, costs, and other considerations.
- For any find determined to be significant, the qualified archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant. The report shall be submitted to the City of Santa Rosa, Northwest Information Center, and State Historic Preservation Office, as required.
- Any previously undiscovered resources found during construction activities shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of the CEQA criteria by a qualified archaeologist.

The last two sentences of the third paragraph under Impact Discussion CUL-2 in Section 4.5.3, *Impact Discussion*, on page 4.5-18 of the Draft EIR is hereby amended as follows:

The proposed General Plan 2050 Chapter 2, *Land Use and Economic Development*; Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*; and Chapter 4, *Urban Design, Cultural and Tribal Cultural Resources, Historic Preservation, and Art and Culture*, contains goals, policies, and actions that require local planning and development decisions to consider impacts to historical and/or unique archaeological resources. The following goals, policies, and actions would minimize impacts to historical and/or unique archaeological resources:

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The following policies and actions in the bulleted list of proposed goals, policies, and actions related to cultural resources under Impact Discussion CUL-2 in Section 4.5.3, *Impact Discussion*, on pages 4.5-19 and 4.5-20 of the Draft EIR are hereby amended as follows:

- **Policy 3-5.3:** Conserve and protect creeks, wetlands, vernal pools, wildlife ecosystems, rare plant habitats, and waterways ~~from development~~.
- ***Action 3-5.19:** ~~The City shall R~~require new development along ~~channelized~~ waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for ~~shared use paths and recreation~~ multiuse trails and recreation, consistent with the Santa Rosa Citywide Creek Master Plan and concept plans that have been developed for specific reaches of the creek network, as subsequently revised, supplemented, or replaced.
- ***Action 3-5.20:** ~~The City shall R~~require new development to maintain an adequate setback from ~~channelized~~ waterways to recognize the 100-year flood elevation, with setbacks in the Creekside Development Standards in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans, as subsequently revised, supplemented, or replaced, to meet restoration and enhancement goals.
- **Policy 4-2.1:** ~~Protect Native American tribal~~ heritage, honor the early stewards of this land, and treat Native American remains and resources with sensitivity.
 - ***Action 4-2.1:** ~~The City shall C~~continue to review proposed developments in ~~conjunction with~~ accordance with federal and State laws and utilize the California Historical Resources Information System, Northwest Information Center, at Sonoma State University as a resource to determine whether project areas contain known subsurface archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources, or if they have the potential to hold such resources ~~and if so, implement mitigation to protect the resource.~~
 - ***Action 4-2.2:** ~~The City shall W~~work in good faith with ~~interested communities local tribes and~~ archaeologists to evaluate proposed development sites for the presence of subsurface ~~historic, archaeological~~ resources, both prehistoric and/or historic era, and tribal cultural resources. These efforts ~~may~~ include:
 - Consideration of existing reports and studies.
 - Consultation with Native American tribes as required by State law.
 - Appropriate site-specific investigative actions.
 - On-site monitoring during excavation if appropriate.
 - Work with local tribes to develop and apply tribal protection policies related to tribal cultural resources.
 - ***Action 4-2.3:** ~~The City shall C~~continue to require that project areas found to contain significant subsurface archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources be examined by a qualified consulting archaeologist with recommendations for protection and preservation, developed in collaboration with local Native American tribes and appropriate tribal monitors, as necessary. Recommendations shall meet the standards of the National Historic Preservation Act, Native American Historic

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Resource Protection Act, National and California Environmental Quality Act, and applicable Santa Rosa planning guidelines, policies, and procedures to protect the resource.

- **Policy 4-2.2:** ~~Collaborate with the most likely descendants, as identified by~~ Contact the Native American Heritage Commission (NAHC) ~~to identify tribes that are traditionally and culturally affiliated with the geographic area of the proposed project.~~
- ***Action 4-2.4:** ~~During ground disturbance for development projects, if~~ tribal cultural resources are encountered ~~during development, halt work shall be halted~~ to avoid altering the materials and their context until a qualified consulting archaeologist and Native American representative ~~(if appropriate)~~ have evaluated the situation and recorded identified tribal cultural resources—which may include sites, features, places, cultural and other landscapes, sacred places, objects, animals, structures, landscapes, or plants with cultural value to the tribe(s)—and determined suitable mitigation measures. If human remains are inadvertently discovered, the County coroner shall be notified immediately. If the coroner determines that the remains are those of a Native American, the coroner must contact the NAHC by phone within 24 hours of making that determination (Health and Safety Code § 7050[c]). The City and the professional archaeologist shall contact the Most Likely Descendent, as determined by the NAHC, regarding the remains.

The significance discussion for Impact CUL-2 in Section 4.5.3, *Impact Discussion*, on pages 4.5-20 and 4.5-21 of the Draft EIR is hereby amended as follows:

Impact CUL-2: Impacts to known and unknown archeological resources could occur from potential future development under the proposed General Plan 2050.

Significance with Mitigation: Less than significant. Implementation of the proposed General Plan 2050 goals, policies, and actions would ensure that new development in the EIR Study Area reduces and mitigates potential impacts to archaeological resources. As demonstrated, the proposed General Plan 2050 goals, policies, and actions encourage infill development, adaptive reuse of structures, and development on underutilized land, which would reduce the potential for disturbing archaeological deposits since ground-disturbing activities have already taken place in developed areas. Specifically, proposed Policy 2-2.2 encourages compact development in the Areas of Change. Proposed Policy 4-1.1 requires the preservation and enhancement of the city’s natural waterways and landscapes, Policy 3-5.7 requires that construction adjacent to creek channels is sensitive to the natural environment, preserves topography and vegetation along the creek, does not disrupt or pollute the waterway, and provides an adequate setback buffer, and *Action 3-5.19 and *Action 3-5.20 require new development along ~~channelized~~ waterways to establish an ecological buffer zone between the waterway and development. Additionally, implementation of the proposed *Action 4-2.1 and *Action 4-2.2 would require the preservation of archaeological and historic resources that are found in the EIR Study Area and would require new development to implement protocols and best management practices that analyze and avoid any potential impacts to subsurface archaeological resources through record searches, preconstruction field surveys, ground-disturbance monitoring, and implementation of appropriate measures or project alternatives to avoid identified significant impacts. Implementation of these protocols and best management practices would ensure compliance with National Historic Preservation Act, Native American Historic Resource Protection Act, National

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Environmental Policy Act, CEQA, and/or applicable Santa Rosa planning guidelines, policies, and procedures to protect the archaeological deposits, both tribal and nontribal. Proposed *Action 4-2.3 requires the City to continue to require that project areas found to contain significant subsurface archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources be examined by a qualified consulting archaeologist with recommendations for protection and preservation developed in collaboration with Native American tribes and appropriate tribal monitors and *Action 4-2.4 requires the evaluation and mitigation of tribal cultural resources by a qualified consulting archaeologist and Native American representative as appropriate. ~~The p~~Proposed General Plan 2050 *Action 4-2.2 also requires development project applicants to consult with Native American representatives regarding cultural resources to identify locations of importance to Native Americans, including archaeological sites and traditional cultural properties. Compliance with federal and State laws, as described in Section 4.5.1.2, *Regulatory Framework*, and the proposed General Plan 2050 goals, policies, and actions listed previously, would protect recorded and unrecorded archaeological deposits in the EIR Study Area by providing for the early detection of potential conflicts between development and resource protection, and by preventing or minimizing the material impairment of the ability of archaeological deposits to convey their significance through excavation or preservation would ensure that potential impacts from implementation of the proposed project would be *less than significant*.

CHAPTER 4.6, ENERGY

The following policy under the first goal in the bulleted list of proposed goals, policies, and actions related to energy under the “Building Electricity” subheading of Impact Discussion ENE-1 in Section 4.6.3, *Impact Discussion*, on page 4.6-19 of the Draft EIR is hereby amended as follows:

- ~~Policy 3-5.3: Increase the use of renewable, carbon free, and distributed energy resources throughout the city.~~ Policy 3-7.2: Reduce energy use and increase energy efficiency in existing and new residential, commercial, industrial, and public structures.

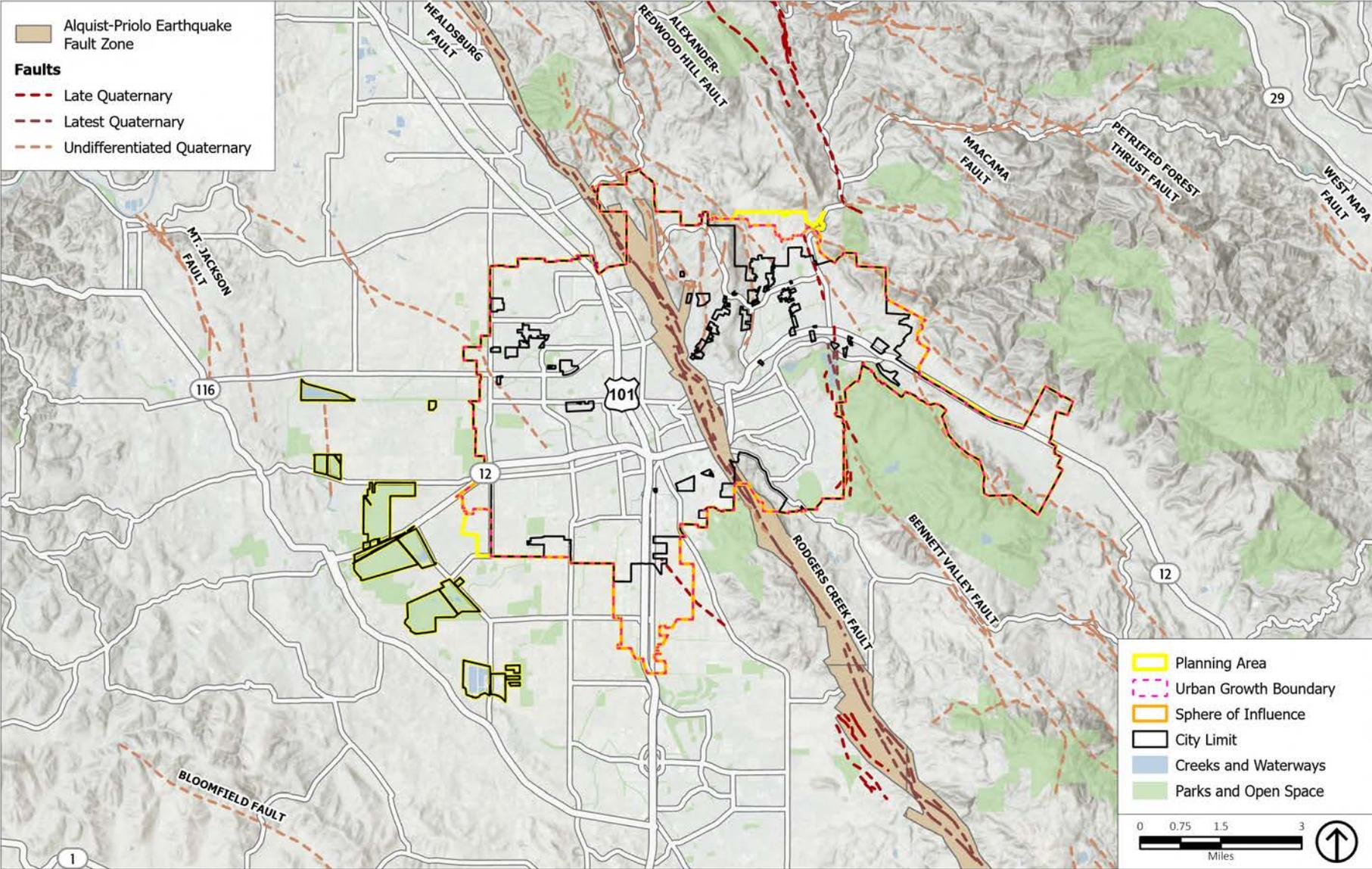
The following policy under the first goal in the bulleted list of proposed goals, policies, and actions related to energy under the “Building Natural Gas” subheading of Impact Discussion ENE-1 in Section 4.6.3, *Impact Discussion*, on page 4.6-22 of the Draft EIR is hereby amended as follows:

- ~~Policy 3-5.3: Increase the use of renewable, carbon free, and distributed energy resources throughout the city.~~ Policy 3-7.2: Reduce energy use and increase energy efficiency in existing and new residential, commercial, industrial, and public structures.

CHAPTER 4.7, GEOLOGY AND SOILS

Figure 4.7-1, *Regional Faults*, on page 4.7-8 of the Draft EIR is hereby revised as shown on the following page.

GEOLOGY AND SOILS



Source: USGS, 2019; City of Santa Rosa, 2020; ESRI, 2022; CGS, 2024; PlaceWorks, 2024.

Figure 4.7-1
Regional Faults

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The following policy and actions in the bulleted list of proposed goals, policies, and actions related to geology and soils under the “Summary” subheading of Impact Discussion GEO-1 in Section 4.7.3, *Impact Discussion*, on page 4.7-18 of the Draft EIR are hereby amended as follows:

- ***Policy 5-1.1:** Prior to new development approval, where there are known geological hazards as shown on Figures 5-2, 5-3, and 5-4 and current maps from the United States Geological Survey, California Geological Survey, California Department of Water Resources, California Office of Emergency Services, the City shall ensure that ~~new development, redevelopment, and major remodels shall avoid or adequately mitigate seismic and geologic hazards through the preparation of a site-specific geologic study prepared by a California Certified Engineering Geologist and/or Geotechnical Engineer and compliance with identified measures.~~
- ***Action 5-1.1:** Prior to new development approval, the City shall ensure site-specific geologic studies and analyses are deemed acceptable by a California Certified Engineering Geologist and/or Geotechnical Engineer ~~for applicable to appropriately mitigate hazardous conditions.~~
- ***Action 5-1.2:** The City shall ~~Restrict development in areas where adverse impacts conditions associated with known natural or human-caused geologic hazards cannot be effectively mitigated, as determined by a California Certified Engineering Geologist and/or Geotechnical Engineer.~~

The significance discussion for Impact GEO-1 in Section 4.7.3, *Impact Discussion*, on page 4.7-19 of the Draft EIR is hereby amended as follows:

Impact GEO-1: Impacts from potential future development under the proposed General Plan 2050 where there are known geological hazards could occur over the buildout horizon of the proposed project.

Significance with Mitigation: Less than significant. Implementation of the proposed General Plan 2050 goals, policies, and actions, as well as compliance with State, regional, and local regulations pertaining to structural safety regarding fault rupture, ground shaking, liquefaction, and landslides, would ensure that potential future development under the proposed project would not directly or indirectly cause or worsen the likelihood of or substantial adverse effects from seismic hazards related to earthquakes, including the risk of loss, injury, or death. Specifically, proposed General Plan 2050 ***Policy 5-1.1** requires that potential future development avoid or mitigate seismic hazards through the preparation of a site-specific geologic study prepared by a California Certified Engineering Geologist and/or Geotechnical Engineer and compliance with identified measures; ***Action 5-1.1** requires ~~potential future development to prepare site-specific geologic studies are prepared deemed acceptable by~~ qualified engineers; and ***Action 5-1.2** requires that potential future development be restricted in areas where adverse impacts conditions associated with known natural or human-caused geologic hazards cannot be effectively mitigated, as determined by a qualified engineer. This includes prohibiting development that would be subject to geological hazard due to its location and/or design and that cannot be mitigated to safe levels. Compliance with the Santa Rosa City Code (SRCC) regulations and proposed General Plan 2050 goals, policies, and actions would mitigate impacts by permitting development only in areas where potential danger to the health, safety, and welfare of the community can be adequately mitigated. Because potential future development under the proposed project would be required to comply with both the California Building Code and the SRCC as well as

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proposed General Plan 2050 goals, policies, and actions, implementation of the proposed project would not cause or worsen seismic ground shaking; therefore, impacts would be *less than significant*.

CHAPTER 4.9, HAZARDS AND HAZARDOUS MATERIALS

The following text is hereby added after the paragraph under the “Hazard Mitigation Plan” subheading in Section 4.9.1.1, *Regulatory Framework*, on page 4.9-9 of the Draft EIR:

Pursuant to California Government Code Section 65302.15 requirements, the City of Santa Rosa is collaborating with Sonoma County on the 2026 MJHMP to assess and enhance evacuation capabilities. This plan will evaluate current strategies, identify infrastructure improvements, and integrate best practices for various evacuation scenarios, including wildfires, earthquakes, and floods. As part of the City’s annex to the MJHMP, Santa Rosa will conduct a detailed evacuation analysis. This study will evaluate current evacuation strategies, identify potential improvements, and integrate best practices to ensure the safety and well-being of the community during emergencies.

The following action in the bulleted list of proposed goals, policies, and actions related to hazards and hazardous materials under Impact Discussion HAZ-4 in Section 4.9.3, *Impact Discussion*, on page 4.9-22 of the Draft EIR is hereby amended as follows:

- **Action 5-4.6:** Work with landowners and support funding identification and cleanup of identified brownfield sites, particularly prioritizing sites in Equity Priority Areas.

The following policy and actions in the bulleted list of proposed goals, policies, and actions related to hazards and hazardous materials under Impact Discussion HAZ-6 in Section 4.9.3, *Impact Discussion*, on pages 4.9-24 and 4.9-25 of the Draft EIR are hereby amended as follows:

- **Policy 5-5.2:** Ensure all community members and businesses are informed and empowered to address hazard vulnerabilities, including especially Equity Priority Populations.
- ***Action 5-5.14:** The City shall Rrequire all new development projects to provide adequate access for fire and emergency response personnel.
- ***Action 5-5.15:** The City shall Pprohibit the creation of new single ingress/egress roadway conditions in the city.
- ***Action 5-5.16:** The City shall Retrofit existing single-access residential neighborhoods to include additional access routes or other provisions to increase evacuation safety.
- ***Action 5-5.17:** The City shall Aanalyze the capacity, viability, and safety of evacuation routes for hazard areas in the city (e.g., WUJFA) and evacuation locations throughout the city under a range of emergency scenarios and incorporate the results, as necessary, into the City’s Emergency Operations Plan Safety Element of the General Plan. This analysis will be completed as part of the City’s Annex to the Sonoma County Multi-Jurisdictional Hazard Mitigation Plan in 2026.

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The following text is hereby added after the bulleted list of proposed goals, policies, and actions related to hazardous materials under Impact Discussion HAZ-6 in Section 4.918.3, *Impact Discussion*, on page 4.9-25 of the Draft EIR:

Additionally, The City has established designated evacuation zones to facilitate organized and efficient evacuations during large-scale emergencies. Residents can identify their specific zones using the interactive Evacuation Zone Look-Up Tool, enabling them to respond promptly to evacuation orders. Santa Rosa evacuation zones are coordinated with the Sonoma County system, ensuring consistency across the region. Residents can cross-reference their zones using the Sonoma County Evacuation Map, which provides interactive features to look up evacuation status and road closures (Sonoma County Evacuation Zone Map), and the City has developed enhanced evacuation zone and road closure maps. During active wildfires, the City coordinates and communicates directly with the Sonoma County Department of Emergency Management, ensuring effective and efficient evacuation throughout the county and city.

The City is collaborating with Sonoma County on the 2026 MJHMP to assess and enhance evacuation capabilities. This plan will evaluate current strategies, identify infrastructure improvements, and integrate best practices for various evacuation scenarios, including wildfires, earthquakes, and floods. As part of the City's annex to the MJHMP, Santa Rosa will conduct a detailed evacuation analysis. This study will evaluate current evacuation strategies, identify potential improvements, and integrate best practices to ensure the safety and well-being of the community during emergencies.

CHAPTER 4.10, HYDROLOGY AND WATER QUALITY

The following policy and actions in the bulleted list of proposed goals, policies, and actions related to hydrology and water quality under the "Summary" subheading of Impact Discussion HYD-1 in Section 4.10.3, *Impact Discussion*, on pages 4.10-30 through 4.10-33 of the Draft EIR are hereby amended as follows:

- **Policy 3-5.3:** Conserve and protect creeks, wetlands, vernal pools, wildlife ecosystems, rare plant habitats, and waterways ~~from development~~.
- ***Action 3-5.10:** The City shall ~~C~~continue to require the implementation of existing regulations and procedures, including subdivision guidelines, zoning, design review, and environmental law, ~~to conserve prior to, during, and after project approval and construction for projects that may affect~~ wetlands and rare plants, riparian habitat and other sensitive natural communities, and essential habitat for special-status species to ensure their conservation. Existing regulations and procedures include, but are not limited to, Federal and California Endangered Species Act; CDFW 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities; Santa Rosa Plain Conservation Strategy; United States Fish and Wildlife (USFWS) Service Programmatic Biological Opinion; CDFW 2012 Staff Report on Burrowing Owl Mitigation; 2012 USFWS Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls; 2020 Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California; Fish and Game Code Section 1600 et seq; Clean Water

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- Act; and Porter Cologne Water Quality Control Act, as subsequently revised, supplemented, or replaced.
- ***Action 3-5.11:** The City shall R~~require~~ a qualified biologist to prepare a biological resource assessment (BRA) ~~as part of project approval~~ for proposed development on sites that may support or have the potential to affect special-status species, sensitive natural communities, important wildlife corridors, or regulated wetlands and waters to identify potential impacts and measures for protecting the resource and surrounding habitat prior to, during, and after project construction. The BRA shall be prepared to address conformance with all applicable federal, State, and local regulations and protocols, including, but not limited to, those listed in Action 3-5.10, as subsequently revised, supplemented, or replaced.
 - ***Action 3-5.19:** The City shall R~~require~~ new development along ~~channelized~~ waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for ~~shared use paths and recreation~~ multiuse trails and recreation, consistent with the Santa Rosa Citywide Creek Master Plan and concept plans that have been developed for specific reaches of the creek network, as subsequently revised, supplemented, or replaced.
 - ***Action 3-5.20:** The City shall R~~require~~ new development to maintain an adequate setback from ~~channelized~~ waterways to recognize the 100-year flood elevation, with setbacks in the Creekside Development Standards in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans, as subsequently revised, supplemented, or replaced, to meet restoration and enhancement goals.
 - **Action 5-2.13:** Identify and collect development impact fees needed to pay for ~~mitigation of~~ stormwater management ~~impacts for~~ of new development.
 - ***Action 5-2.14:** The City shall R~~require~~ improvements that maintain and improve the storm drainage system citywide and prioritize areas needing significant investment, consistent with the Santa Rosa Citywide Creek Master Plan goals of preserving natural conditions of waterways and minimizing channelization of creeks.
 - ***Action 5-2.15:** The City shall E~~ensure~~ creek-side paths and trails are consistent with the Citywide Creek Master Plan and ~~Active Transportation~~ Bicycle and Pedestrian Master Plan, as subsequently revised, supplemented, or replaced, and are incorporated into stormwater improvement projects along creek corridors.
 - ***Action 5-2.17:** The City shall R~~require~~ implementation of best management practices for all new development to reduce discharges of nonpoint-source pollutants to the storm drain system.
 - ***Action 5-9.30:** The City shall E~~evaluate~~ stormwater capture and reuse consistent with goals of the Santa Rosa Citywide Creek Master Plan and the MS4 National Pollutant Discharge Elimination System (NPDES) permit to preserve natural conditions of waterways, minimize channelization of creeks, and protect water quality, and identify, educate, and label to promote community awareness that storm drains flow untreated into creeks.

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The significance discussion for Impact HYD-1 in Section 4.10.3, *Impact Discussion*, on page 4.10-34 of the Draft EIR is hereby amended as follows:

Impact HYD-1: Impacts to water quality could occur from implementation of the proposed project.

Significance with Mitigation: Less than significant. Implementation of the proposed General Plan 2050 goals, policies, and actions listed above would reduce impacts related to water quality. Specifically, proposed *Action 3-5.10 and *Action 3-5.11 require the evaluation and mitigation of impacts to sensitive habitats, which includes wetlands and waterways, and would ensure impacts to water quality would be mitigated. Proposed *Action 3-5.19 and *Action 3-5.20 require that new development along ~~channelized~~ waterways establish an ecological buffer zone between the waterway and development and that adequate setbacks be maintained to protect water quality. Proposed *Action 5-2.14 and *Action 5-2.15 require improvements that maintain and improve the storm drainage system citywide and that ensure creekside paths and trails are developed consistent with the Citywide Creek Master Plan, which ensures runoff is captured and water quality is protected. Proposed *Action 5-2.17 requires the City to require implementation of best management practices for all new development to reduce discharges of nonpoint-source pollutants to the storm drain system. Lastly, proposed *Action 5-9.30, requires the the City to evaluate ~~ion of~~ stormwater capture and reuse consistent with goals of the Santa Rosa Citywide Creek Master Plan and the MS4 NPDES permit. Implementation of the proposed General Plan 2050 goals, policies, and actions, in conjunction with adherence to MS4 permit requirements, the CGP, and the City's Low Impact Development Technical Design Manual, would ensure that potential future development under the proposed project would not violate any water quality standards or waste discharge requirements for both construction and operational phases, and impacts would be *less than significant*.

The following action in the bulleted list of proposed goals, policies, and actions related to hydrology and water quality under the "Summary" subheading of Impact Discussion HYD-2 in Section 4.10.3, *Impact Discussion*, on page 4.10-36 of the Draft EIR is hereby amended as follows:

- ~~Action 5-9.11: Continue working with the Santa Rosa Plain Cooperate with the State and~~ Action 5-9.11: Cooperate with the State and Groundwater Sustainability Agencies ~~to in implementing the Sustainable Groundwater Sustainability Plan and Management Act, achieving the sustainability goal for the Subbasin, and seeking any available State or federal assistance to support of local groundwater resources management programs.~~

CHAPTER 4.11, LAND USE AND PLANNING

The text under Impact Discussion LU-1 in Section 4.11.3, *Impact Discussion*, on page 4.11-3 of the Draft EIR is hereby amended as follows:

For the purposes of this EIR, an established community is considered a place where there are existing permanent infrastructure (roadways, utilities, etc.), structures (buildings, parks, homes, etc.), and populations. The physical division of an established community typically refers to the construction of a physical feature or the removal of a means of access (such as a local road or bridge) that would impair

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mobility within an existing community or between a community and outlying areas. For example, an airport, roadway, or railroad track through an existing community could constrain travel from one side of the community to another or impair travel to areas outside of the community.

The following actions in the bulleted list of proposed goals, policies, and actions related to land use and planning under the “Sonoma Local Agency Formation Commission” subheading of Impact Discussion LU-2 in Section 4.11.3, *Impact Discussion*, on pages 4.11-4 and 4.11-5 of the Draft EIR are hereby amended as follows:

- **Action 2-1.6:** ~~Require a~~ Rely upon appropriate fiscal impact and marketing analysis for proposed annexations ~~when determined necessary by staff~~ to ensure a full accounting of infrastructure and public service costs and confirm whether revenue enhancement mechanisms are necessary to ensure net fiscal balance.
- **Action 2-1.9:** Continue to meet with County of Sonoma staff to coordinate land use and economic development issues of mutual concern in the Urban Growth Boundary.

The following actions in the bulleted list of proposed goals, policies, and actions related to land use and planning under the “Plan Bay Area” subheading of Impact Discussion LU-2 in Section 4.11.3, *Impact Discussion*, on pages 4.11-6 and 4.11-7 of the Draft EIR are hereby amended as follows:

- **Action 2-1.10:** ~~Consider~~ Pursue updating the Zoning Code to allow for compatible residential and commercial uses in office parks, light industrial areas, and other similar areas.
Such compatible uses could include, but are not limited to, live-work units, artisan studios/shops, galleries, brew pubs, coffee shops, tasting rooms, sports and entertainment venues, and event spaces.
- **Action 2-2.1:** Work with landowners and developers to encourage development that will increase access to goods and services that support daily life, such as access to fresh produce, recreation and sporting opportunities, community gathering places, active transportation infrastructure, and transit, especially in Equity Priority Areas and Areas of Change.
- **Action 2-2.5:** Explore ways to encourage development in Areas of Change and Equity Priority Areas that include services within one-half mile walking and biking distance of residential neighborhoods
- **Action 2-3.1:** Update the Zoning Code to permit residential and mixed-use development by right in some nonresidential zoning districts, ~~as mandated by State law.~~
- **Action 2-3.2:** ~~Identify~~ Work to reduce barriers and/or create incentives ~~to for~~ mixed-use redevelopment in areas that are currently lacking components of a complete neighborhood and mitigate/implement these.

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CHAPTER 4.12, NOISE

The following actions in the bulleted list of proposed goals, policies, and actions related to noise under the “Construction” subheading of Impact Discussion NOI-1 in Section 4.12.3, *Impact Discussion*, on pages 4.12-35 and 4.12-36 of the Draft EIR are hereby amended as follows:

- ***Action 5-7.1:** ~~The City shall~~ Continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Municipal Code standards.
- ***Action 5-7.2:** ~~The City shall~~ Use the Federal Transit Administration’s construction noise and vibration thresholds as applicable to assess impacts to surrounding land uses and identify ~~mitigation measures~~ during the project approval process to ensure the threshold is met prior to project approval.
- ***Action 5-7.10:** ~~The City shall~~ Update the Noise Ordinance to incorporate construction best management practices (BMP) to minimize construction noise, and require projects to demonstrate compliance with the BMPs prior to project approval.

The following actions in the bulleted list of proposed goals, policies, and actions related to noise under the “Vehicular Noise” subheading of Impact Discussion NOI-1 in Section 4.12.3, *Impact Discussion*, on pages 4.12-45 through 4.12-48 of the Draft EIR are hereby amended as follows:

- ***Action 5-7.3:** ~~The City shall~~ Require conditions of approval or mitigation development projects to reduce noise exceeding normally acceptable levels as identified in Figure 5-13, unless the activities are specifically exempted by the City Council, on the basis of community health, safety, and welfare, such as emergency medical vehicles, helicopters, and sirens.
- ***Action 5-7.7:** ~~The City shall~~ Work with Caltrans to evaluate and develop traffic noise mitigation programs along Highway 101 and State Route 12.
- ***Action 5-7.9:** ~~Use conditions of approval to achieve~~ The City shall require development projects to implement measures to reduce noise and vibration impacts primarily through site planning, and avoid engineering solutions for noise and vibration mitigation, such as sound walls, if possible.

The significance discussion for Impact NOI-1b in Section 4.12.3, *Impact Discussion*, on page 4.12-48 of the Draft EIR is hereby amended as follows:

Impact NOI-1b: Operational vehicle traffic noise increases could exceed the City’s significance thresholds with implementation of the proposed project.

Significance with Mitigation: Significant and unavoidable. Implementation of proposed General Plan 2050 ~~*Action 5-7.1 requires~~ the City to continue to require the preparation of acoustical studies ~~prepared~~ by qualified acoustical consultants to evaluate and mitigate noise impacts. Proposed ~~*Action 5-7.2 requires~~ the City to apply the Federal Transit Administration’s vibration thresholds to assess impacts to surrounding land uses. Proposed ~~*Action 5-7.3 requires~~ conditions of approval or mitigation ~~the City to require development projects~~ to reduce noise exceeding normally acceptable levels unless the activities are specifically exempted by the City Council on the basis of community

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health, safety, and welfare, such as emergency medical vehicles, helicopters, and sirens. Proposed *Action 5-7.7 requires the City to work with Caltrans to evaluate and develop traffic noise mitigation programs along US Highway 101 and State Route 12. Furthermore, proposed *Action 5-7.9 requires ~~conditions of approval to achieve~~ the City to require development projects to implement measures to reduce noise impacts primarily through site planning and avoid engineering solutions for noise mitigation, such as sound walls, if possible. Since project-specific details are unknown and future conditions of approval may not be feasible or reduce vehicle traffic noise below significance thresholds in all cases, this impact is conservatively considered *significant and unavoidable*. The identification of this program-level impact does not preclude the finding of less-than-significant impacts for subsequent projects analyzed at the project level that do not exceed the noise thresholds.

The text under the “Stationary Source Noise” subheading in Section 4.12.3, *Impact Discussion*, on page 4.12-49 of the Draft EIR is hereby amended as follows:

Stationary sources of noise may occur on all types of land uses. Residential uses generate noise from landscaping, maintenance activities, and air conditioning systems. Commercial uses generate noise from HVAC systems, loading docks, and other sources. Industrial uses may generate noise from HVAC systems, loading docks, and possibly machinery. Noise generated by residential or commercial uses is generally short and intermittent. Industrial uses may generate noise on a more continual basis. Nightclubs, outdoor dining areas, gas stations, car washes, fire stations, drive-throughs, swimming pool pumps, school playgrounds, athletic and music events, and public parks are other common noise sources. The proposed General Plan 2050 includes proposed Action 5-8.2 that addresses impacts from stationary sources and requires the City to consider updates to the Noise Ordinance to identify noise mitigation measures and other strategies to ~~allow support~~ the establishment, growth, and/or continuation of music, sports, and entertainment venues. Proposed Action 5-8.2 also encourages and allows these uses with appropriate noise thresholds. Some operational noise sources used for emergency purposes shall be exempt from City noise limits. Such activities would include emergency vehicle sirens, emergency medical helicopter operations, operation of emergency generators during emergency power outages, etc. Stationary noise sources are controlled by SRCC Chapter 17-16, which would ensure that potential future projects would not exceed the City’s established thresholds (see Table 4.12-5). Accordingly, impacts would be *less than significant*.

The significance discussion for Impact NOI-1c in Section 4.12.3, *Impact Discussion*, on page 4.12-50 of the Draft EIR is hereby amended as follows:

Impact NOI-1c: Operational noise increases could exceed the City’s significance thresholds and could be incompatible with existing uses.

Significance with Mitigation: Less than Significant. Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities*, of the proposed General Plan 2050, requires local planning and development decisions to consider noise and land use compatibility. Specifically, proposed Policy 5-7.1 requires the City to maintain and enforce the City’s Noise Ordinance to protect the health and comfort of people living, working, going to school, and recreating in Santa Rosa. Proposed *Action 5-7.1 directs the City to continue to require acoustical studies prepared by qualified acoustical consultants in accordance with Santa Rosa City Code standards. Proposed *Action 5-7.3 requires

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~~conditions of approval or mitigation~~ the City to require development projects to reduce noise exceeding normally acceptable levels unless the activities are specifically exempted by the City Council on the basis of community health, safety, and welfare, such as emergency medical vehicles, helicopters, and sirens. Proposed Action 5-7.5 requires the City to consider ways to reduce roadway noise to normally acceptable levels in areas where noise standards may otherwise be exceeded (e.g., where homes front regional/arterial streets and in areas of mixed-use development). Proposed Action 5-7.6 requires the City to consider updating the Municipal Code to require new development to provide buffers other than sound walls and allow sound walls only when other techniques would not prevent projected noise levels from exceeding adopted land use compatibility standards. Proposed *Action 5-7.9 requires the City to ~~use conditions of approval to achieve~~ require development projects to implement measures to reduce noise impacts primarily through site planning and avoid engineering solutions for noise mitigation, such as sound walls, if possible. Accordingly, implementation of the proposed policies and actions of the General Plan 2050, noise and land use compatibility would be a factor in project approval decisions, to verify that the proposed development would not increase noise beyond the City's established thresholds and that it would not generate noise that would be incompatible with existing uses in the vicinity of the proposed development. Accordingly, impacts associated with land use compatibility would be *less than significant*.

The significance discussion for Impact NOI-2a in Section 4.12.3, *Impact Discussion*, on page 4.12-52 of the Draft EIR is hereby amended as follows:

Impact NOI-2a: Construction activities associated with potential future development under the proposed General Plan 2050 could generate excessive short-term vibration levels during project construction.

Significance with Mitigation: Less than significant. As described under impact discussion NOI-1, Chapter 5, *Safety, Climate Resilience, Noise, and Public Services and Facilities*, of the proposed General Plan 2050 contains goals, policies, and actions that require local planning and development decisions to consider noise impacts, including those from vibration. Specifically, proposed *Action 5-7.1 requires ~~the City to continue to require~~ the preparation of acoustical studies ~~prepared~~ by qualified acoustical consultants to evaluate and mitigate noise impacts. Proposed *Action 5-7.2 requires the City to use the Federal Transit Administration's (FTA) construction and noise vibration thresholds to assess impacts to surrounding land uses. Proposed *Action 5-7.10 requires the City to adopt construction best management practices (BMP) to reduce vibration caused from construction equipment and require projects to demonstrate compliance with BMPs. In most cases of individual developments associated with implementation of the proposed project, construction that requires the use of vibration-causing construction equipment, such as pile driving, caisson drilling, vibratory roller, or a large bulldozer, would temporarily increase the ambient noise environment in the vicinity of the individual project, potentially affecting existing and future nearby sensitive users. The use of alternate methods/equipment for construction required in proposed *Action 5-7.10 throughout the entire active construction period would help to ensure that construction noise from vibration is minimized to the extent feasible. Some common alternate methods/equipment used for construction include, but are not limited to:

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- For pile driving, the use of caisson drilling (drill piles), vibratory pile drivers, oscillating or rotating pile installation methods, pile pressing, “silent” piling, and jetting or partial jetting of piles into place using a water injection at the tip of the pile.
- For paving, use of a static roller in lieu of a vibratory roller.
- For grading and earthwork activities, off-road equipment limited to 100 horsepower or less.

Proposed *Action 5-7.1 requires the preparation of acoustical studies prepared by qualified acoustical consultants to evaluate and mitigate impacts and ~~proposed~~ *Action 5-7.2 requires the City to use vibration thresholds based on the FTA criteria for acceptable levels of groundborne vibration for various types of construction equipment. Should the FTA criteria be exceeded, a list of alternate methods/equipment can be used, as provided above. This would ensure that construction vibration impacts would remain less than significant because alternate methods/equipment with less or no vibration, such as those shown in Table 4.12-14, *Reference Vibration Source Levels for Construction Equipment*, would meet the thresholds. The potential vibration impacts associated with demolition and construction activities would be reduced to a less-than-significant level by establishing safe limits to protect structures from potential damage and would minimize vibration impacts.

The significance discussion for Impact NOI-2b in Section 4.12.3, *Impact Discussion*, on page 4.12-53 of the Draft EIR is hereby amended as follows:

Impact NOI-2b: Operational activities associated with potential future development under the proposed General Plan 2050 could generate excessive long-term vibration levels.

Significance with Mitigation: Less than significant. Implementation of proposed General Plan 2050 *Action 5-7.1 requires the preparation of acoustical studies prepared by qualified acoustical consultants to evaluate and mitigate impacts and *Action 5-7.2 requires the City to use vibration thresholds based on the ~~Federal Transit Administration’s (FTA’s)~~ groundborne vibration for various types of construction equipment. As described in Section 4.12.2.2, Federal Transit Administration Vibration Limits, the FTA establishes vibration limits from operational activities for impacts to be less than significant on a project-by-project basis. For vibration annoyance from operational sources, the FTA recommends criteria for frequent, occasional, and infrequent events. Furthermore, proposed *Action 5-7.9 requires ~~conditions of approval to achieve~~ the City to require development projects to implement measures to reduce noise impacts primarily through site planning, and avoid engineering solutions for noise mitigation, such as sound walls, if possible. As part of the project approval process, future project applicants would be required to comply with the FTA thresholds and the City would review all development proposals to verify that the proposed development would not significantly increase noise beyond the City’s established thresholds. Therefore, with implementation of the proposed General Plan 2050 *Action 5-7.1, *Action 5-7.2, and *Action 5-7.9, vibration impacts from operation are considered *less than significant*.

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The first section under the “Regulatory Framework” subheading in Section 4.14.2.1, *Environmental Setting*, on page 4.14-13 of the Draft EIR is hereby amended as follows:

State Regulations

~~The Mello-Roos Communities Facilities Act of 1982~~

~~The Mello-Roos Community Facilities Act, Government Code Section 53311 et seq., provides an alternative method of financing certain public capital facilities and services through special taxes. This State law empowers local agencies to establish CFDs to levy special taxes for facilities such as police service facilities.~~

The third bullet under the “Santa Rosa City Code” subheading in Section 4.14.2.1, *Environmental Setting*, on page 4.14-13 of the Draft EIR is hereby amended as follows:

- **Chapter 21-04, *Capital Facilities Fees*.** This chapter creates a CFF, which is used to alleviate the cost of certain public infrastructure facilities required to serve new development in the City of Santa Rosa. Out of the five account areas, public safety will have 12.8 percent of the revenue from each CFF.

The text under the “Facilities” subheading in Section 4.14.2.1, *Environmental Setting*, on page 4.14-14 of the Draft EIR is hereby amended as follows:

There is one main SRPD police station, which is at 965 Sonoma Avenue, directly adjacent to SRFD Station 1 and east of Downtown Santa Rosa. Together, this complex is commonly referred to as the Public Safety Building. SRPD has a fleet of 150 vehicles. SRPD reports that the Public Safety Building is aging and in need of extensive repairs and required updates, and it no longer meets SRPD’s needs. Based on current conditions and anticipated growth, SRPD has stated its needs for a larger facility with an on-site training center in the next 10 years and two additional substations, ~~one in east Santa Rosa and one in the Roseland neighborhood to replace a temporary substation,~~ to reach SRPD’s goal to provide better coverage of the entire city. SRPD has planned for the addition of a Sebastopol Road substation and a Roseland substation and has desires to establish a new substation in East Santa Rosa as well.

The last paragraph under Impact Discussion PS-3 in Section 4.14.2.3, *Impact Discussion*, on page 4.14-17 of the Draft EIR is hereby amended as follows:

Similar to impact discussion PS-1, while the proposed project would increase demand on police protection services, growth would most likely occur incrementally over the lifetime of the project, and it would be unlikely that the magnitude of increased demands as a result of the full buildout potential of the proposed project would be placed on facilities within the immediate timeframe or all at once. ~~Payment of capital facilities fees, c~~Consistency with the proposed General Plan goals, policies, and actions discussed above, and compliance with the regulations described under Section 4.14.2.1, *Environmental Setting*, would ensure that the SRPD is involved as potential future development occurs in the EIR Study Area. Furthermore, future construction of new police stations would be subject to separate project-level environmental review pursuant to CEQA, as required, to identify potential environmental impacts and mitigation measures as needed and would also be subject to the mitigation measures contained

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throughout this EIR to reduce potential environmental impacts. Therefore, impacts on police service facilities would be *less than significant*.

The third paragraph under the “Existing Conditions” subheading in Section 4.14.3.1, *Environmental Setting*, on page 4.14-20 of the Draft EIR is hereby amended as follows:

Table 4.14-1, ~~*Santa Rosa School District’s Student Enrollment and School Capacity of School Districts in the EIR Study Area*~~, gives an overview of all the school districts in the EIR Study Area and their enrollment and capacity numbers. Overall, school districts in the area are operating below capacity.

Table 4.14-1, *Santa Rosa School District’s Student Enrollment and School Capacity*, on page 4.14-20 of the Draft EIR is hereby renamed to *Student Enrollment and School Capacity of School Districts in the EIR Study Area*, as shown:

TABLE 4.14-1 ~~SANTA ROSA SCHOOL DISTRICT’S STUDENT ENROLLMENT AND SCHOOL CAPACITY OF SCHOOL DISTRICTS IN THE EIR STUDY AREA~~

School Districts	Student Enrollment	School Capacity	Student Enrollment of School Capacity
Bellevue Union School District	1,612	1,875	86%
Bennett Valley School District	1,015	1,040	98%
Kenwood School District	137	160	86%
Piner-Olivet School District	1,265	2,230	57%
Rincon Valley Unified School District	3,075	3,654	84%
Roseland School District	2,915	3,700	79%
Santa Rosa City School District	15,570	18,061	85%
Wright Elementary School District	1,481	2,400	62%
Private Schools	2,155	---	----
Total Students	27,070^a	33,120^a	62%^a

Note:

a. Private schools were not counted in the total due to limited information about student capacity.

The first section under the “State Regulations” subheading in Section 4.14.4.1, *Environmental Setting*, on page 4.14-37 of the Draft EIR is hereby amended as follows:

Mello-Roos Community Facilities Act of 1982

~~The Mello-Roos Community Facilities Act, Government Code Section 53311 et seq., provides an alternative method of financing certain public capital facilities and services through special taxes. This State law empowers local agencies to establish CFDs to levy special taxes for facilities such as libraries.~~

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The first paragraph under the “Sonoma County Library” subheading in Section 4.14.4.1, *Environmental Setting*, on page 4.14-38 of the Draft EIR is hereby amended as follows:

The Sonoma County Library (SCL) consists of the Central Library, which includes 10 branches, 2 rural stations, and 1 temporary site to serve the population of Sonoma County. It also encompasses three special collections: the Sonoma County Wine Library, the History and Genealogy Annex, and the Petaluma History Room. Of these locations, four are in the EIR Study Area: Central Library, Northwest Santa Rosa Library, Rincon Valley Library, and Roseland Community Library. In 2015, SCL served almost two million visitors; circulated more than 3.5 million books, audiobooks, DVDs, and electronic resources; and answered over 250,000 reference questions. The City of Santa Rosa and SCL are currently in the process of developing the Hearn Community Hub, a project that includes a new library on a 6-acre site in southwest Santa Rosa.

The “Measure O” subheading in Section 4.14.5.1, *Environmental Setting*, on page 4.14-44 of the Draft EIR is hereby renamed to “Measure H (previously Measure O)” and the associated text is hereby amended as follows:

Measure H (previously Measure O)

Measure O, approved by Santa Rosa voters in 2004, imposed a special transaction and use tax to generate revenue for police, fire, and gang prevention and intervention. Measure O funds are presided over by a Citizens Oversight Committee. A portion of these funds are used for year-round special recreational programming that supports the mission of the gang prevention and intervention program. Measure O was renewed in 2022 for an additional 20 years, and is now referred to as Measure H.

The following action in the bulleted list of proposed goals, policies, and actions related to parks and recreation under Impact Discussion PS-9 in Section 4.14.5.3, *Impact Discussion*, on pages 4.14-50 through 4.14-52 of the Draft EIR is hereby amended as follows:

- **Policy 6-7.1:** Work to eEnsure adequate funding to keep parks safe, attractive, and responsive to community needs, including funding for park acquisition, planning, capital improvements, lifecycle replacement of amenities, recreation programming, recreation centers, and maintenance operations.
- **Action 6-7.2:** Evaluate park development ~~impact fees annually to address projects that that meet the Quimby Act guidelines, as well as those for projects that do not meet Quimby Act guidelines, and maintenance costs periodically.~~ Work to ensure sufficient funds for park acquisition, development, and maintenance from developers.
- **Action 6-7.3:** Use the Parks Condition Assessment and Prioritization Report’s data-driven evaluation of park assets to develop a replacement schedule for park amenities and plan for future ~~budgetary~~ needs.
- **Action 6-7.6:** Develop and maintain ~~a five-year capital improvement~~ plan for acquisition, development, and replacement that considers equity by providing opportunities for public input and prioritizing investment in the parks and recreation center sites in areas of the city where need is greatest.

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- **Action 6-7.8:** When diversion or disposal of parkland is determined to be in the public interest, work to acquire additional parklands to replace those lands, preferably within the same quadrant of the city.
- **Action 6-7.16:** Explore u~~Update~~ing the City Code to require dedication of new parkland or recreation center sites when redevelopment of a developed site results in increased residential densities that create a need for such facilities.
- **Action 6-7.17:** Facilitate equitable, authentic community engagement in recreation and parks planning to identify the needs and priorities of all segments of the community, ~~including individuals in Equity Priority Areas and those unable to attend public meetings.~~

CHAPTER 4.15, TRANSPORTATION

The text under the “California Complete Streets Act of 2008” subheading in Section 4.15.1.2, *Regulatory Framework*, on page 4.15-2 of the Draft EIR is hereby amended as follows:

California Complete Streets Act of 2008

The Complete Streets Act (Assembly Bill [AB] 1358) requires city and county general plans to include policies that support the development of facilities for a multimodal transportation network. Complete Streets principles should be incorporated into street design to meet the needs of all users—drivers, bicyclists, pedestrians, and transit riders—regardless of age or physical ability. Jurisdictions that undertake updates of their general plan must plan for a balanced multimodal transportation network that meets the needs of all users, incorporating appropriate goals, policies, and actions into the mandatory circulation element.²

In December 2021, Directors Policy 37 was adopted which establishes an implementation structure to streamline complete street projects. This policy also stipulates that all transportation projects funded or overseen by Caltrans will provide comfortable, convenient, and connected complete streets facilities for people walking, biking, and taking transit or passenger rail unless an exception is documented and approved.³ This policy supersedes Deputy Directive 64-R1, and carries forward its goals of creating a safe and reliable transportation network.

³ California Department of Transportation, December 2021, Directors Policy Dp-37, <https://dot.ca.gov/-/media/dot-media/programs/esta/documents/dp-37-complete-streets-a11y.pdf> accessed on November 26, 2024.

The following text is hereby added before the “Caltrans District 4 Bike Plan” subheading in Section 4.15.1.2, *Regulatory Framework*, on page 4.15-3 of the Draft EIR:

Caltrans District 4 Pedestrian Plan

Adopted in 2021, the Caltrans District 4 Pedestrian Plan for the Bay Area identifies pedestrian needs on Caltrans roadways in District 4. This plan analyzes the frequency and quality of crossing opportunities, as well as sidewalk coverage and conditions. Needs were then prioritized and areas for improvement were

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identified. The next steps in the plan include leveraging local partnerships and identifying and initiating projects.

The following policy and actions in the bulleted list of proposed goals, policies, and actions related to transportation under Impact Discussion TRAN-1 in Section 4.15.3, *Impact Discussion*, on pages 4.15-19 through 4.15-25 of the Draft EIR are hereby amended as follows:

- **Policy 3-3.2:** Bolster outreach, marketing, and education about non-automobile modes of transportation, especially. Outreach should ~~pay for~~ give priority to marketing efforts in Equity Priority Areas and Priority Development Areas.
- **Action 3-3.14:** Require new development to provide transit improvements where needed, including:
 - Direct, paved pedestrian access to transit stops.
 - Bus turnouts and weather-protected shelters.
 - Bus-ready travel lanes.
- **Action 3-4.1:** Require traffic studies for development projects that may have an substantial impact on the circulation system and use traffic study findings to define improvements that would also support active and public transportation.

The following action in the bulleted list of proposed goals, policies, and actions related to transportation under Impact Discussion TRAN-2 in Section 4.15.3, *Impact Discussion*, on pages 4.15-27 and 4.15-28 of the Draft EIR is hereby amended as follows:

- ***Action 3-1.1:** For all projects with the potential to increase VMT based on the City's VMT screening criteria, the City shall require a qualified transportation engineer to prepare an analysis of projected VMT and mitigation, as necessary, as part of the project review process for projects with the potential to increase VMT consistent with the City's VMT guidelines, as subsequently revised, supplemented, or replaced.

The first paragraph of the significance discussion for Impact Statement TRAN-2a in Section 4.15.3, *Impact Discussion*, on page 4.15-28 of the Draft EIR is hereby amended as follows:

Impact TRAN-2a: Implementation of the proposed project could result in a significant vehicle miles traveled (VMT) impact for residential VMT per capita.

Significance with Mitigation: Significant and unavoidable. Implementation of the proposed General Plan 2050 goals, policies, and actions would reduce the VMT generated by all development including residential uses. In support of proposed General Plan 2050 Policy 3-1.1 to reduce VMT, proposed *Action 3-1.1 requires the City to require a qualified transportation engineer to prepare an analysis of project VMT consistent with the City's VMT guidelines for all projects with the potential to increase VMT based on the City's VMT screening criteria and mitigation as part of the project review process. Proposed Action 3-1.2 requires the City to work with other local and regional partners to explore developing a VMT mitigation bank. Proposed Action 3-1.3 and Action 3-1.5 supports prioritizing investments that will reduce VMT and GHG emissions.

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The significance discussion for Impact Statement TRAN-2b in Section 4.15.3, *Impact Discussion*, on page 4.15-31 of the Draft EIR is hereby amended as follows:

Impact TRAN-2b: Implementation of the proposed project could result in a significant roadway network vehicle miles traveled (VMT) impact associated with increasing the capacity of the arterial street network.

Significance with Mitigation: Significant and unavoidable. Implementation of the proposed General Plan 2050 goals, policies, and actions listed under impact discussions TRAN-1 and TRAN-2 would improve the active transportation network, work with partner agencies to reduce VMT, encourage development in TPAs and PDAs, amongst others to reduce VMT generated by all development. Specifically, proposed *Action 3-1.1 requires the City to require a qualified transportation engineer to prepare an analysis of project VMT consistent with the City's VMT guidelines for all projects with the potential to increase VMT based on the City's VMT screening criteria and mitigation as part of the project review process. Even with implementation of the proposed General Plan 2050 goals, policies, and actions related to VMT reduction, the effectiveness of VMT-reduction strategies and availability of alternative mitigation strategies such as VMT exchanges or banks is not certain. As such, the impact on roadway network VMT is considered significant and unavoidable.

CHAPTER 4.16, TRIBAL CULTURAL RESOURCES

The text under the "Ethnographic Setting" subheading in Section 4.16.1.2, *Existing Conditions*, on pages 4.16-5 and 4.16-6 of the Draft EIR is hereby amended as follows:

Linguists and ethnographers tracing the evolution of languages have found that most of the indigenous languages of the California region belong to one of five widespread North American language groups (the Hokan and Penutian phyla, and the Uto-Aztecan, Algic, and Athabaskan language families). The distribution and internal diversity of four of these groups suggest that their original centers of dispersal were outside, or peripheral to, the core territory of California, that is, the Central Valley, the Sierra Nevada, the Coast Range from Cape Mendocino to Point Conception, and the Southern California coast and islands. Only languages of the Hokan phylum can plausibly be traced back to populations inhabiting parts of this core region during the Archaic period, and there are hints of connections between certain branches of Hokan, such as that between Salinan and Seri, that suggest that at least some of the Hokan languages could have been brought into California by later immigrants, primarily from the Southwest and northwestern Mexico.²

At the time of Euroamerican settlement, people inhabiting this area spoke Southern Pomo, one of seven mutually unintelligible Pomoan languages belonging to the Hokan language stock. ~~The Southern Pomo's aboriginal territory falls within present day Sonoma County. To the north, it reaches the divide between Rock Pile Creek and the Gualala River, and to the south it extends to near the town of Cotati. The eastern boundary primarily runs along the western flanks of Sonoma Mountain until it reaches Healdsburg, where it crosses to the west side of the Russian River. Within the larger area that constitutes the Southern Pomo homelands, some bands or tribelets occupied distinct areas.~~

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The Bitagomtara were a triblet of the Southern Pomo and they occupied the lands south of Mark West Creek, north of Cotati and the boundary of the Coast Miwok, east of the Laguna de Santa Rosa, and west of Sonoma Canyon.^{3,4} Primary village sites of the Southern Pomo were occupied continually, while temporary sites were visited to procure resources that were especially abundant or available only during certain seasons. Sites often were situated near freshwater sources and in ecotones where plant life and animal life were diverse and abundant.

~~Primary village sites of the Southern Pomo were occupied continually, while temporary sites were visited to procure resources that were especially abundant or available only during certain seasons. Sites often were situated near freshwater sources and in ecotones where plant life and animal life were diverse and abundant. There are several ethnographic villages in the EIR Study Area.⁵~~

~~The Southern Pomo population was decimated early in the historic period, especially in the southern part of their territory. Ethnic identity was severely impacted in the region of Santa Rosa and Sebastopol; McLendon and Oswalt reported that the few Southern Pomo speakers remaining in 1976 were from north of Healdsburg.⁶ In 1992, the Southern Pomo and Coast Miwok established the Federated Indians of Graton Rancheria and were federally recognized in 2000. The Federated Indians of Graton Rancheria is a federally recognized tribe of Southern Pomo and Coast Miwok people, whose ancestral homelands include the City of Santa Rosa.~~

~~Footnote 2: V. Golla, 2011, *California Indian Languages*, Berkeley and Los Angeles: University of California Press.~~

~~Footnote 3: R. Milliken, 1995, *A Time of Little Choice: The Disintegration of Tribal Culture in the San Francisco Bay Area, 1769-1810*, Menlo Park, CA: Ballena Press.~~

~~Footnote 4: O. Stewart, 1943, "Notes on Pomo Ethnogeography", *University of California Publications in American Archaeology and Ethnology* 40, no. 2, pp.29-62.~~

~~Footnote 5: S. Barrett, 1908, *The Ethno-Geography of the Pomo and Neighboring Indians*, *University of California Publications in American Archaeology and Ethnology*, vol. 6, no. 1, Berkeley, California: University of California Press.~~

~~Footnote 6: S. McLendon and R. Oswalt, 1978, "Pomo," In *California*, edited by R. Heizer, pp. 274-288, *Handbook of North American Indians*, Vol. 8, W. Sturtevant, general editor, Washington, D.C.: Smithsonian Institution.~~

The third paragraph under the "Native American Consultation: Assembly Bill 52" subheading in Section 4.16.1.2, *Existing Conditions*, on page 4.16-7 of the Draft EIR is hereby amended as follows:

~~As a result of the consultations to date, no TCRs have been identified and as described in Chapter 4.5 of this Draft EIR, only the following requests have been made:~~

- Work to develop a better communication system for the required AB 52 and Senate Bill 18 consultation between City staff and tribes.
- Tribal acknowledgment to be added to the Housing Element and to be carried forward in the comprehensive General Plan.
- Consider Phase 1 archaeological survey for all projects that involve ground disturbance: allowing potential exceptions where the ground has already been disturbed.
- Develop a threshold for when ministerial projects with ground disturbance can include consultation.
- Expand consideration of projects along waterways to include historical locations and trajectories.

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- Ensure the plan includes adequate goals, policies, and actions related to resilience.

The first paragraph under Impact Discussion TCR-1 in Section 4.16.3, *Impact Discussion*, on pages 4.16-8 and 4.16-9 of the Draft EIR is hereby amended as follows:

As previously described in Section 4.16.1.1, *Regulatory Framework*, CEQA defines a TCR as a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope, sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register or included in a local register of historical resources, or if the City of Santa Rosa, acting as the lead agency, supported by substantial evidence, chooses at its discretion to treat the resource as a TCR.¹ ~~Through the consultation process described in Section 4.16.1.2, *Existing Conditions*, no California Native American Tribe has identified the presence of TCRs in the EIR Study Area. However,~~ there is the potential for TCRs to be identified as part of project-specific development over the course of the implementation of the proposed project.

The first row in Table 4.16-1, *Tribal Consultation Requests and City Responses*, on page 4.16-9 of the Draft EIR is hereby amended as follows:

TABLE 4.16-1 TRIBAL CONSULTATION REQUESTS AND CITY RESPONSES

Request	Response
Work to develop a better communication system for the required SB 18 and AB 52 consultation between City staff and tribes.	Proposed General Plan 2050 Policy 4-2.2, *Action 4-2.1, and *Action 4-2.2 require the review of projects, consultation with Native American tribes as required by State law, and collaboration with the most likely descendants, as identified by the Native American Heritage Commission.

The third paragraph under Impact Discussion TCR-1 in Section 4.16.3, *Impact Discussion*, on page 4.16-10 of the Draft EIR is hereby amended as follows:

~~While no TCRs have been acknowledged as part of the consultation process or otherwise, t~~There is the potential to unearth archeological resources or human remains, which could be identified as TCRs upon discovery. The proposed General Plan 2050 Chapter 2, *Land Use and Economic Development*; Chapter 3, *Circulation, Open Space, Conservation, and Greenhouse Gas Reduction*; and Chapter 4, *Urban Design, Cultural and Tribal Cultural Resources, Historic Preservation, and Art and Culture*, contains goals, policies, and actions that require local planning and development decisions to consider impacts to TCRs and archaeological resources, which have the potential to be identified as TCRs upon discovery archaeological resources. The following goals, policies, and actions would minimize impacts to TCRs and archaeological resources:

The following policies and actions in the bulleted list of proposed goals, policies, and actions related to tribal cultural resources under Impact Discussion TCR-1 in Section 4.16.3, *Impact Discussion*, on pages 4.16-10 and 4.16-11 of the Draft EIR are hereby amended as follows:

- **Policy 3-5.3:** Conserve and protect creeks, wetlands, vernal pools, wildlife ecosystems, rare plant habitats, and waterways ~~from development.~~

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- ***Action 3-5.19:** ~~The City shall R~~require new development along ~~channelized~~ waterways to establish an ecological buffer zone between the waterway and development that also provides opportunities for ~~shared use paths and recreation~~ multiuse trails and recreation, consistent with the Santa Rosa Citywide Creek Master Plan and concept plans that have been developed for specific reaches of the creek network, as subsequently revised, supplemented, or replaced.
- ***Action 3-5.20:** ~~The City shall R~~require new development to maintain an adequate setback from ~~channelized~~ waterways to recognize the 100-year flood elevation, with setbacks in the Creekside Development Standards in the Zoning Code as minimums and larger setbacks encouraged in accordance with Restoration Concept Plans, as subsequently revised, supplemented, or replaced, to meet restoration and enhancement goals.
- **Policy 4-2.1:** Protect ~~Native American~~ tribal heritage, honor the early stewards of this land, and treat Native American remains and resources with sensitivity.
 - ***Action 4-2.1:** ~~The City shall C~~continue to review proposed developments in ~~conjunction with~~ accordance with federal and State laws and utilize the California Historical Resources Information System, Northwest Information Center, at Sonoma State University as a resource to determine whether project areas contain known subsurface archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources, or if they have the potential to hold such resources ~~and if so, implement mitigation to protect the resource.~~
 - ***Action 4-2.2:** ~~The City shall W~~work in good faith with ~~interested communities~~ local tribes and archaeologists to evaluate proposed development sites for the presence of subsurface ~~historic,~~ archaeological resources, both prehistoric and/or historic era, and tribal cultural resources. These efforts ~~may~~ include:
 - Consideration of existing reports and studies.
 - Consultation with Native American tribes as required by State law.
 - Appropriate site-specific investigative actions.
 - On-site monitoring during excavation if appropriate.
 - Work with local tribes to develop and apply tribal protection policies related to tribal cultural resources.
 - ***Action 4-2.3:** ~~The City shall C~~continue to require that project areas found to contain significant subsurface archaeological resources, both prehistoric and/or historic-era, and tribal cultural resources be examined by a qualified consulting archaeologist with recommendations for protection and preservation, developed in collaboration with local tribes and tribal monitors, as appropriate. Recommendations shall meet the standards of the National Historic Preservation Act, Native American Historic Resource Protection Act, National and California Environmental Quality Act, and applicable Santa Rosa planning guidelines, policies, and procedures to protect the resource.
- **Policy 4-2.2:** ~~Collaborate with the most likely descendants, as identified by~~ Contact the Native American Heritage Commission (NAHC) to identify tribes that are traditionally and culturally affiliated with the geographic area of the proposed project.

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- ***Action 4-2.4:** During ground disturbance for development projects, if tribal cultural resources are encountered during development, work shall be halted to avoid altering the materials and their context until a qualified consulting archaeologist and Native American representative (if appropriate) have evaluated the situation and recorded identified tribal cultural resources—which may include sites, features, places, cultural and other landscapes, sacred places, objects, animals, structures, landscapes, or plants with cultural value to the tribe(s)—and determined suitable mitigation measures. If human remains are inadvertently discovered, the County coroner shall be notified immediately. If the coroner determines that the remains are those of a Native American, the coroner must contact the NAHC by phone within 24 hours of making that determination (Health and Safety Code § 7050[c]). The City and the professional archaeologist shall contact the Most Likely Descendent, as determined by the NAHC, regarding the remains.

The significance discussion for Impact Statement TCR-1 in Section 4.16.3, *Impact Discussion*, on page 4.16-12 of the Draft EIR is hereby amended as follows:

Impact TCR-1: Impacts to unknown tribal cultural resources (TCR) could occur from potential future development under the proposed General Plan 2050.

Significance with Mitigation: Less than significant. The proposed General Plan 2050 includes goals, policies, and actions that require local planning and development decisions to reduce impacts to archaeological resources that could qualify as TCRs and to conduct consultation with Native American tribes as required by State law. Specifically, proposed Policy 2-2.2 encourages infill development in Areas of Change, which reduces opportunities to unearth potential TCRs and Action 3-5.4 requires the City to collaborate with regional agencies to expand open space that would protect historic and TCRs. Proposed *Action 4-2.1 and *Action 4-2.2 requires the City to continue to review proposed developments to determine if TCRs are present and evaluate proposed development sites for TCRs through consultation with local Native American tribes. Additionally, proposed *Action 4-2.4 requires that if TCRs are encountered during development ground disturbance, work is halted to avoid altering the materials and their context until a qualified consulting archaeologist and Native American representative have evaluated the situation, and recorded identified cultural resources, which may include sites, features, places, cultural and other landscapes, sacred places, objects, animals, structures, landscapes, and plants with cultural value to the tribe(s), and determined suitable site-specific mitigation measures.

The proposed General Plan 2050 also includes policies and actions to protect historic and cultural resources, including waterways as Native American archaeological sites tend to be located near waterways and these locations may hold prehistoric resources. As listed under impact discussion CUL-1 in Chapter 4.5, *Cultural Resources*, of this Draft EIR, proposed General Plan 2050 Policy 4-1.1 requires the preservation and enhancement of the city's natural waterways and landscapes; Policy 3-5.7 requires that construction adjacent to creek channels is sensitive to the natural environment, preserves topography and vegetation along the creek, does not disrupt or pollute the waterway, and provides an adequate setback buffer; and *Action 3-5.19 and *Action 3-5.20 require new development along channelized waterways to establish an ecological buffer zone between the waterway and development.

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Compliance with federal and State laws, as described in Section 4.16.1.1, *Regulatory Framework*, and the proposed General Plan 2050 goals, policies, and actions would protect unrecorded TCRs in the EIR Study Area by providing for the early detection of potential conflicts between development and resource protection, and by preventing or minimizing the material impairment of the ability of archaeological deposits to convey their significance through excavation or preservation. Therefore, impacts to TCRs would be *less than significant*.

The first paragraph under Impact Discussion TCR-2 in Section 4.16.3, *Impact Discussion*, on page 4.16-13 of the Draft EIR is hereby amended as follows:

Cumulative impacts to TCRs occur when a series of actions leads to adverse effects on local Native American tribes or tribal lands. ~~No TCRs have been identified in the EIR Study Area. Further, in~~ association with CEQA review, future AB 52 consultations with Native American tribes to identify TCRs would be required for projects that have the potential to cause significant impacts to TCRs.

CHAPTER 4.17, UTILITIES AND SERVICE SYSTEMS

The following action in the bulleted list of proposed goals, policies, and actions related to water under the “Water Demand Analysis” subheading of Impact Discussion USS-1 in Section 4.17.1.3, *Impact Discussion*, on pages 4.17-23 through 4.17-25 of the Draft EIR is hereby amended as follows:

- ***Action 5-9.30:** ~~The City shall Evaluate~~ stormwater capture and reuse consistent with goals of the Santa Rosa Citywide Creek Master Plan and the MS4 National Pollutant Discharge Elimination System (NPDES) permit to preserve natural conditions of waterways, minimize channelization of creeks, and protect water quality, and identify, educate, and label to promote community awareness that storm drains flow untreated into creeks.

The following actions in the bulleted list of proposed goals, policies, and actions related to stormwater under Impact Discussion USS-7 in Section 4.17.3.3, *Impact Discussion*, on pages 4.17-46 and 4.17-47 of the Draft EIR are hereby amended as follows:

- **Action 5-2.13:** Identify and collect development impact fees needed to pay for ~~mitigation of~~ stormwater management ~~impacts for~~ of new development.
- ***Action 5-2.14:** ~~The City shall Require~~ improvements that maintain and improve the storm drainage system citywide and prioritize areas needing significant investment, consistent with the Santa Rosa Citywide Creek Master Plan goals of preserving natural conditions of waterways and minimizing channelization of creeks.
- **Action 5-2.15:** ~~The City shall Ensure~~ creek-side paths and trails are consistent with the Citywide Creek Master Plan and ~~Active Transportation Bicycle and Pedestrian Master Plan, as subsequently revised, supplemented, or replaced,~~ and are incorporated into stormwater improvement projects along creek corridors.

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- ***Action 5-2.17:** The City shall require implementation of best management practices for all new development to reduce discharges of nonpoint-source pollutants to the storm drain system.

The following policy under the first goal in the bulleted list of proposed goals, policies, and actions related to energy infrastructure under Impact Discussion USS-12 in Section 4.17.5.3, *Impact Discussion*, on page 4.17-67 of the Draft EIR is hereby amended as follows:

- ~~Policy 3-5.3: Increase the use of renewable, carbon free, and distributed energy resources throughout the city.~~ **Policy 3-7.2:** Reduce energy use and increase energy efficiency in existing and new residential, commercial, industrial, and public structures.

CHAPTER 4.18, WILDFIRE

The following text is hereby added after the bulleted list under the “Hazard Mitigation Plan” subheading in Section 4.18.1.1, *Regulatory Framework*, on page 4.18-11 of the Draft EIR:

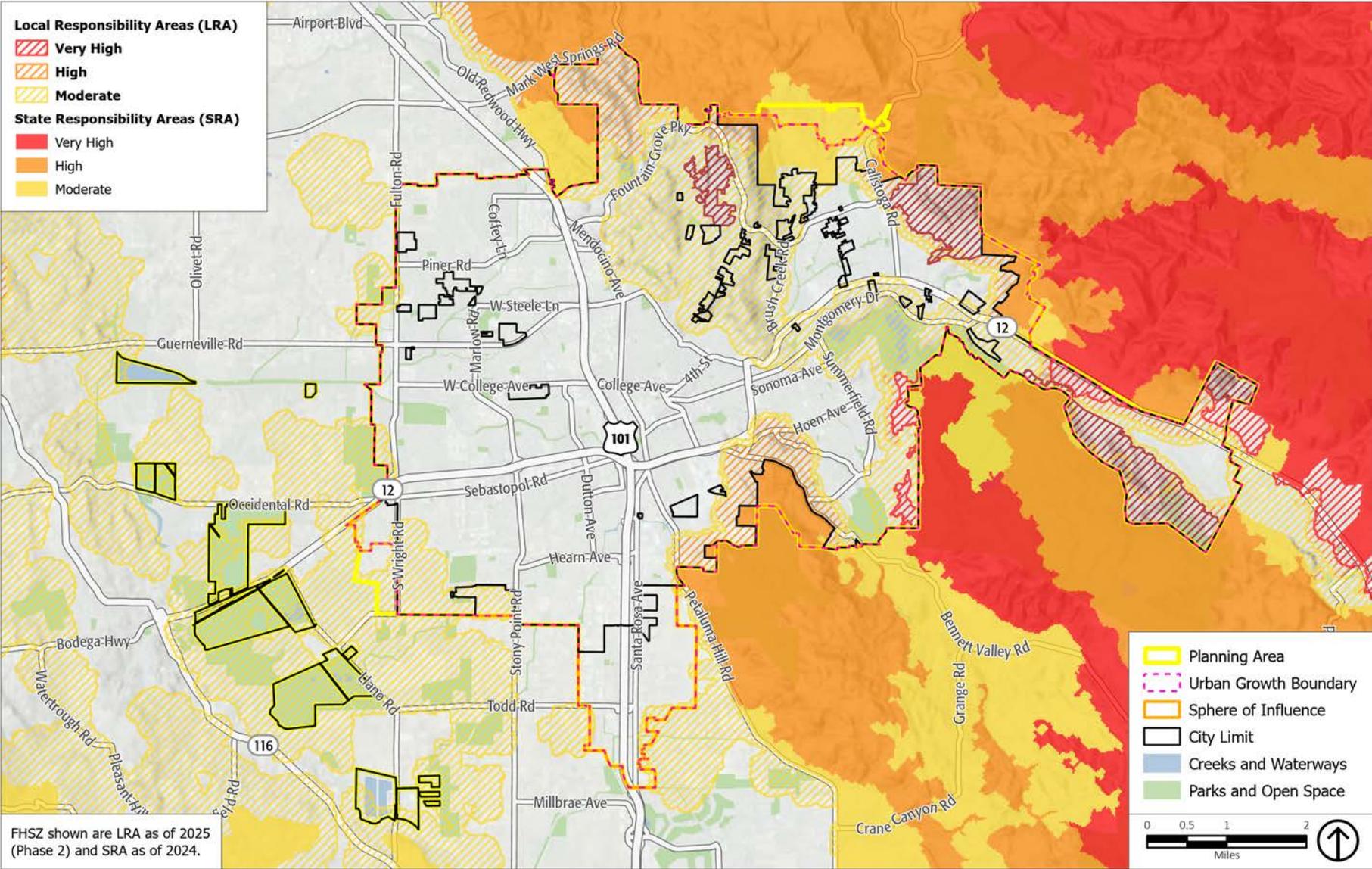
Pursuant to California Government Code Section 65302.15 requirements, the City of Santa Rosa is collaborating with Sonoma County on the 2026 MJHMP to assess and enhance evacuation capabilities. This plan will evaluate current strategies, identify infrastructure improvements, and integrate best practices for various evacuation scenarios, including wildfires, earthquakes, and floods. As part of the City’s annex to the MJHMP, Santa Rosa will conduct a detailed evacuation analysis. This study will evaluate current evacuation strategies, identify potential improvements, and integrate best practices to ensure the safety and well-being of the community during emergencies.

The first paragraph under the “Wildfire in Santa Rosa” subheading in Section 4.18.1.2, *Existing Conditions*, on page 4.18-16 of the Draft EIR is hereby amended as follows:

As shown on Figure 4.18-1, *Fire Hazard Severity Zones*, the EIR Study Area is in both the LRA and SRA. ~~Lands within the city limit are within the LRA, and lands between the city limit and the Planning Area boundary are within the SRA.~~ Figure 4.18-1 shows Very High FHSZs in the LRA are in the ~~Fountain Grove, Skyhawk, Bennett Valley~~ and Oakmont neighborhoods of the city. High FHSZ in the LRA border the northern, eastern, and southeastern inner boundaries of the EIR Study Area and Moderate FHSZ covering the northern, eastern, and southwestern portions of the EIR Study Area. The SRA to the north and south of the city limits contain Moderate, High, and Very High FHSZs. As shown on Figure 4.18-2, General Plan Land Uses in Wildland Urban Interface Fire Areas, land uses within the WUIFA consist of very low and low density residential, with other land uses consisting of parks and recreation, medium density residential, medium low density residential, public/institutional, and retail and business services.

Figure 4.18-1, *Fire Hazard Severity Zones*, on page 4.18-1 of the Draft EIR is hereby amended as shown on the following page.

WILDFIRE



Source: City of Santa Rosa, 2020; ESRI, 2022; CAL FIRE 2025; PlaceWorks, 2025.

Figure 4.17-1
Fire Hazard Severity Zones

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The following actions in the bulleted list of proposed goals, policies, and actions related to wildfire under Impact Discussion WF-1 in Section 4.18.3, *Impact Discussion*, on pages 4.18-28 and 4.18-29 of the Draft EIR are hereby amended as follows:

- ***Action 5-5.14:** The City shall ~~R~~require all new development projects to provide adequate access for fire and emergency response personnel.
- ***Action 5-5.15:** The City shall ~~P~~rohibit the creation of new single ingress/egress roadway conditions in the city.
- ***Action 5-5.16:** The City shall ~~R~~etrofit existing single-access residential neighborhoods to include additional access routes or other provisions to increase evacuation safety.
- ***Action 5-5.17:** The City shall ~~A~~nalyze the capacity, viability, and safety of evacuation routes for hazard areas in the city (e.g., WUIFA) and evacuation locations throughout the city under a range of emergency scenarios and incorporate the results, as necessary, into the City's Emergency Operations Plan Safety Element of the General Plan. This analysis will be completed as part of the City's Annex to the Sonoma County Multi-Jurisdictional Hazard Mitigation Plan in 2026.

The following text is hereby added after the bulleted list of proposed goals, policies, and actions related to wildfire under Impact Discussion WF-1 in Section 4.18.3, *Impact Discussion*, on page 4.18-29 of the Draft EIR:

Additionally, the City has established designated evacuation zones to facilitate organized and efficient evacuations during large-scale emergencies. Residents can identify their specific zones using the interactive Evacuation Zone Look-Up Tool, enabling them to respond promptly to evacuation orders. Santa Rosa evacuation zones are coordinated with the Sonoma County system, ensuring consistency across the region. Residents can cross-reference their zones using the Sonoma County Evacuation Map, which provides interactive features to look up evacuation status and road closures, and the City is developing enhanced evacuation zone and road closure maps. During active wildfires, the City coordinates and communicates directly with the Sonoma County Department of Emergency Management, ensuring effective and efficient evacuation throughout the county and city.

The City is collaborating with Sonoma County on the 2026 MJHMP to assess and enhance evacuation capabilities. This plan will evaluate current strategies, identify infrastructure improvements, and integrate best practices for various evacuation scenarios, including wildfires, earthquakes, and floods. As part of the City's annex to the MJHMP, Santa Rosa will conduct a detailed evacuation analysis. This study will evaluate current evacuation strategies, identify potential improvements, and integrate best practices to ensure the safety and well-being of the community during emergencies.

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Impact Statement WF-1 and the associated significance discussion in Section 4.18.3, *Impact Discussion*, on page 4.18-29 of the Draft EIR is hereby amended as follows:

Impact WF-1: Implementation of the proposed General Plan 2050 could result in inadequate wildfire-related evacuation access ~~the and~~ impair the implementation of an emergency evacuation plan.

Significance with Mitigation: Less than significant. Implementation of the proposed General Plan 2050 goals, policies, and actions would increase the effectiveness of emergency operations and wildfire-related evacuation, and therefore would not impair or conflict with applicable plans. Specifically, proposed *Action 5-5.16 would reduce the number of evacuation-constrained residential parcels identified on Figure 4.18-5, *Evacuation Routes and Evacuation-Constrained Residential Parcels*, by requiring the City to retrofit existing single-access roads in residential neighborhoods to include additional access routes or other provisions to increase evacuation safety. Proposed *Action 5-5.17 would improve evacuation scenarios by requiring the City to ~~conduct an analysis~~ analyze the capacity, viability, and safety of the evacuation route network to determine the capacity, viability, and safety of evacuation routes and evacuation locations throughout the city under a range of emergency scenarios and incorporate the results into the Safety Element of the General Plan, which would be incorporated into the Emergency Operations Plan and would improve evacuation scenarios. This analysis shall be completed as part of the City's Annex to the Sonoma County Multi-Jurisdictional Hazard Mitigation Plan in 2026. In addition, as described, the proposed changes to the circulation infrastructure include strategic improvements that include evacuation route upgrades primarily on arterials within Wildland-Urban Interface Fire Areas. Future development, regardless of whether it includes new development or redevelopment, would be required to comply with adopted local, regional, and State plans and regulations addressing emergency response and evacuation, including proposed *Action 5-5.14 and *Action 5-5.15, which require the provision of adequate access for fire and emergency response personnel and prohibit the creation of new single access roadways in the city. Therefore, implementation of the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan and impacts would be *less than significant*.

The following policy and actions in the bulleted list of proposed goals, policies, and actions related to wildfire under Impact Discussion WF-2 in Section 4.18.3, *Impact Discussion*, on pages 4.18-31 through 4.18-33 of the Draft EIR are hereby amended as follows:

- ***Policy 5-1.1:** Prior to new development approval, where there are known geological hazards as shown on Figures 5-2, 5-3, and 5-4 and current maps from the United States Geological Survey, California Geological Survey, California Department of Water Resources, California Office of Emergency Services, the City shall ensure that ~~new~~ new development, redevelopment, and major remodels shall avoid or adequately mitigate seismic and geologic hazards through the preparation of a site-specific geologic study prepared by a California Certified Engineering Geologist and/or Geotechnical Engineer and compliance with identified measures.
- ***Action 5-1.1:** Prior to new development approval, the City shall ensure site-specific geologic studies and analyses are deemed acceptable by a California Certified Engineering Geologist and/or Geotechnical Engineer ~~for applicable~~ to appropriately mitigate hazardous conditions.

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- ***Action 5-1.2:** ~~The City shall R~~ restrict development in areas where adverse ~~impacts-conditions~~ associated with known natural or human-caused geologic hazards cannot be effectively mitigated, as determined by a California Certified Engineering Geologist and/or Geotechnical Engineer.
- **Action 5-3.3:** Seek provision of land management plans or alternative methods to fund vegetation management efforts, support defensible space maintenance on private property and create fire breaks, greenbelts, and staging areas in strategic locations in conformance with Title 14 of the California Code of Regulations for all existing and new development.
- **Policy 5-3.2:** Increase wildfire resiliency using required and voluntary risk reduction regulations and strategies in addition to Title 14 of the California Code of Regulations.
 - **Action 5-3.4:** Adhere to the most current State and local regulations and recommendations for the Community Wildfire Protection Plan that address wildfire risk and vulnerabilities and adopt the latest versions of the fire hazard severity zone maps released by CAL FIRE.
 - **Action 5-3.6:** Continue to require conformance with ~~the California Fire Safe Regulations-Title 14 of the California Code of Regulations~~ for existing nonconforming properties in the Wildland-Urban Interface Fire Area (WUIFA) (includes the Very High Fire Hazard Severity Zone).
 - ***Action 5-3.8:** ~~The City shall R~~ require the preparation of fire protection plans for new development and major remodels in the City's Very High Fire Hazard Severity Zone and Wildland-Urban Interface Fire Area (WUIFA). Require that fire protection plans be consistent with requirements of the California Fire Code and include a risk analysis, fire response capabilities, fire safety requirements (e.g., defensible space, infrastructure, and building ignition resistance), mitigation measures, design considerations for non-conforming fuel modifications, wildfire education maintenance and limitations, and evacuation plans.
- **Policy 5-3.3:** Promote new development in areas of the community that have lower risk of wildfire hazards (outside of the WUIFA).
 - **Action 5-3.14:** Establish a maintenance and monitoring program to track the effectiveness and long-term financial capabilities of Community Wildfire Protection Plan fuel-treatment activities, such as community fire breaks, and roadway (public/private) clearance.

The following actions in the bulleted list of proposed goals, policies, and actions related to wildfire under Impact Discussion WF-4 in Section 4.18.3, *Impact Discussion*, on pages 4.18-37 through 4.18-39 of the Draft EIR are hereby amended as follows:

- **Action 5-2.13:** Identify and collect development impact fees needed to pay for ~~mitigation of~~ stormwater management ~~impacts for~~ of new development.
- ***Action 5-2.14:** ~~The City shall R~~ require improvements that maintain and improve the storm drainage system citywide and prioritize areas needing significant investment, consistent with the Santa Rosa Citywide Creek Master Plan goals of preserving natural conditions of waterways and minimizing channelization of creeks.

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- **Action 5-2.15:** The City shall ~~Ensure~~ creek-side paths and trails are consistent with the Citywide Creek Master Plan and ~~Active Transportation Bicycle and Pedestrian Master Plan, as subsequently revised, supplemented, or replaced,~~ and are incorporated into stormwater improvement projects along creek corridors.
- ***Action 5-2.17:** The City shall ~~R~~require implementation of best management practices for all new development to reduce discharges of nonpoint-source pollutants to the storm drain system.
- ***Action 5-9.30:** The City shall ~~E~~valuate stormwater capture and reuse consistent with goals of the Santa Rosa Citywide Creek Master Plan and the MS4 National Pollutant Discharge Elimination System (NPDES) permit to preserve natural conditions of waterways, minimize channelization of creeks, and protect water quality, and identify, educate, and label to promote community awareness that storm drains flow untreated into creeks.

CHAPTER 5, ALTERNATIVES TO THE PROPOSED PROJECT

The first paragraph in Section 5.3.1, *Description*, on page 5-10 of the Draft EIR is hereby amended as follows:

Pursuant to CEQA Guidelines Section 15126.6(e)(1), the No Project Alternative is required as part of the “reasonable range of alternatives” to allow decision makers to compare the impacts of approving the proposed project with the impacts of taking no action or not approving the proposed project. Consistent with CEQA Guidelines Section 15126.6(e)(3)(A), when the project is the revision of a plan, as in this case, the no project alternative will be the continuation of the existing plan. Under Alternative A, potential future development in Santa Rosa would continue to be subject to existing policies, regulations, development standards, and land use designations of the existing General Plan 2035. Alternative A would not implement the amendments to the North Station Area Specific Plan (NSASP), ~~Downtown Station Area Specific Plan (DSASP)~~, ~~Roseland Area/Sebastopol Road Specific Plan (RA/SRSP)~~, or Santa Rosa City Code (SRCC) associated with the proposed General Plan 2050 and Land Use Map. Alternative A would also not adopt the proposed GHG Reduction Strategy to serve as the strategic plan for how the City will reduce GHG emissions and foster a sustainable community through 2050 and beyond

The first paragraph in Section 5.4.1, *Description*, on page 5-22 of the Draft EIR is hereby amended as follows:

Alternative B assumes the General Plan would be updated as well as the associated amendments to the NSASP, ~~DSASP, RA/SRSP,~~ and SRCC associated with the proposed General Plan 2050 and Land Use Map. Accordingly, Alternative B, like the proposed project, would focus future commercial and residential growth in PDAs and/or TPAs and in the Areas of Change that are near Downtown, transit facilities, and along central thoroughfares connected to transit facilities. Alternative B assumes the same number of households, residential units, population, and jobs as under the proposed project, but would allow for more opportunity for dense housing connected to transit facilities. Alternative B presumes the same General Plan land use designations as the proposed project, except that the parcels designated as Medium Low density residential (8.0-13.0 units per gross acre) in Areas of Change that are in or adjacent

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to PDAs and/or TPAs would be redesignated to Medium High density residential (~~8.0-18.0~~30.0 units per gross acre).